

Attention:

Natural Gas Pipeline of America  
Attn: Karen Nielsen  
370 Van Gordon Street  
Lakewood, Colorado 80228

State of Illinois

CLEAN AIR ACT PERMIT  
PROGRAM (CAAPP) PERMIT

Source:

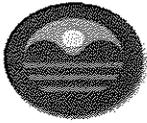
Natural Gas Pipeline of America  
2513 North 2125 Street  
St. Elmo, Illinois 62458

I.D. No.: 051808AAB  
Permit No.: 95120217

Permitting Authority:

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
217/785-1705





# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

## CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

[Title V Permit]

Type of Application: Renewal  
Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 051808AAB  
Permit No.: 95120217  
Statement of Basis No.: 95120217-1405

Date Application Received: June 6, 2006  
Date Issued: October 16, 2014

Expiration Date: October 16, 2019  
Renewal Submittal Date: 9 Months Prior to Expiration Date

Source Name: Natural Gas Pipeline Company of America  
Address: 2513 North 2125 Street  
City: St. Elmo  
County: Fayette  
ZIP Code: 62458

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact James Quinn at 217/785-1705.

Raymond E. Pilapil  
Acting Manager, Permit Section  
Division of Air Pollution Control

REP:MTR:JOQ:jws

cc: IEPA, Permit Section  
IEPA, FOS, Region 3  
Lotus Notes Database



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**Section 1 - Source Information**

**1. Addresses**

|   |   |
|---|---|
| <p><u>Source</u><br/>                 Natural Gas Pipeline Company of America<br/>                 2513 North 2125 Street<br/>                 St. Elmo, Illinois 62458</p>   | <p><u>Owner</u><br/>                 Natural Gas Pipeline of America<br/>                 370 Van Gordon Street<br/>                 Lakewood, Colorado 80228</p> |
| <p><u>Operator</u><br/>                 Natural Gas Pipeline Company of America<br/>                 2513 North 2125 Street<br/>                 St. Elmo, Illinois 62458</p> | <p><u>Permittee</u><br/>                 The Owner and Operator of the source as identified in this table.</p>  |

**2. Contacts**

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

|                             | <i>Name</i>  | <i>Title</i>        |
|-----------------------------|--|---------------------|
| <i>Responsible Official</i> | Dee Bennett  | Operations Director |
| <i>Delegated Authority</i>  | No other individuals have been authorized by the IEPA. | N/A                 |

Other Contacts

|                          | <i>Name</i>    | <i>Phone No.</i> | <i>Email</i>                    |
|--------------------------|----------------|------------------|---------------------------------|
| <i>Source Contact</i>    | Charles Barker | 303-914-7616     | Charles_barker@kindermorgan.com |
| <i>Technical Contact</i> | Charles Barker | 303-914-7616     | Charles_barker@kindermorgan.com |
| <i>Correspondence</i>    | Charles Barker | 303-914-7616     | Charles_barker@kindermorgan.com |
| <i>Billing</i>           | Charles Barker | 303-914-7616     | Charles_barker@kindermorgan.com |

**3. Single Source**

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

| <i>I.D. No.</i> | <i>Permit No.</i> | <i>Single Source Name and Address</i> |
|-----------------|-------------------|---------------------------------------|
| N/A             | N/A               | N/A                                   |

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## Section 2 - General Permit Requirements

### 1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

### 2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
  - i. An emergency occurred and the source can identify the cause(s) of the emergency.
  - ii. The source was at the time being properly operated.
  - iii. The source submitted notice of the emergency to the IEPA within 2 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.
  - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

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upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

### **3. General Provisions**

#### **a. Duty to Comply**

The source 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]

#### **b. Need to Halt or Reduce Activity is not a Defense**

It shall not be a defense for the source 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]

#### **c. Duty to Maintain Equipment**

The source 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. [Section 39.5(7)(a) of the Act]

#### **d. 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. [Section 39.5(7)(a) of the Act]

#### **e. Duty to Pay Fees**

- i. The source must pay fees to the IEPA 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]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

#### **f. Obligation to Allow IEPA Surveillance**

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

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- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
  - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
  - B. As otherwise authorized by the Act.
- v. 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.

**g. Effect of Permit**

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall 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 the Owner or Operator of the 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 Clean Air Act.
  - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 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. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

**h. Severability Clause**

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this 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 source 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]

**4. Testing**

- a. 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

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any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, 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:
  - i. **Testing by Owner or Operator:** The IEPA 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 IEPA, at such reasonable times as may be specified by the IEPA 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 IEPA shall have the right to observe all aspects of such tests.
  - ii. **Testing by the IEPA:** The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, 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.

## **5. Recordkeeping**

### **a. Control Equipment Maintenance Records**

Pursuant to Section 39.5(7)(b) of the Act, 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 maintenance was performed and the nature of preventative maintenance activities.

### **b. Retention of Records**

- i. 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]
- ii. Pursuant to Section 39.5(7)(a) of the Act, 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 different period is specified by a particular permit provision.

### **c. Availability of Records**

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of

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requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

## **6. Certification**

### **a. Compliance Certification**

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
  - A. The identification of each term or condition of this permit that is the basis of the certification.
  - B. The compliance status.
  - C. Whether compliance was continuous or intermittent.
  - D. 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.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

### **b. Certification by a Responsible Official**

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source 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 in Attachment 4 of this permit.

## **7. Permit Shield**

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source 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 IEPA, 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 8/12/2014 (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

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- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

## **8. Title I Conditions**

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR".
- i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
- ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN".
- i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
- ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

## **9. Reopening and Revising Permit**

### **a. Permit Actions**

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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 source 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]

**b. Reopening and Revision**

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

**c. Inaccurate Application**

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

**d. Duty to Provide Information**

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA 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 source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

**10. 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]

**11. Permit Renewal**

- a. 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 the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(1) and (o) of the Act]
- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

**12. Permanent Shutdown**

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Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the 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.

### **13. Startup, Shutdown, and Malfunction**

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

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Date Received: 06/06/2006  
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## Section 3 - Source Requirements

### 1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

#### a. Fugitive Particulate Matter

i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, 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 toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.

#### ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

#### b. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), 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:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.
- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

#### c. Asbestos Demolition and Renovation

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or

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demolish pursuant to Condition 3.1(c)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.

- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

**d. Neshap Standards (40 CFR 63 Subpart DDDDD)**

Pursuant to 40 CFR 63.7495(b), no later than January 31, 2016, the source must:

- i. Meet the applicable general provisions of 40 CFR 63 Subpart A. See Condition 7.3(a).
- ii. Have a one-time energy assessment performed on the source specified in 40 CFR 63 Subpart DDDDD Table 3 Condition 4, Pursuant to 40 CFR 63.7500(a)(1).

**e. Future Emission Standards**

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee 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 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

**2. Applicable Plans and Programs**

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

**a. Fugitive PM Operating Program**

Should this source become subject to 35 IAC 212.302, the Permittee shall prepare and operate under a Fugitive PM Operating Program consistent with 35 IAC 212.310 and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). Any future Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the Fugitive PM Operating Program is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Fugitive PM Operating Program. In the event that the IEPA notifies the Permittee of a deficiency with any Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

**b. PM<sub>10</sub> Contingency Measure Plan**

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM<sub>10</sub> Contingency Measure Plan reflecting the PM<sub>10</sub> emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM<sub>10</sub> Contingency Measure Plan.

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**c. Episode Action Plan**

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.
- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7) (a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on May 9, 2014, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO<sub>2</sub>, PM<sub>10</sub>, NO<sub>2</sub>, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

**d. 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 Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit 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, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a) (2) (i) and (ii).

**3. Title I Requirements**

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

**4. Synthetic Minor Limits**

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7) (f) of the Act. Addresses are included in Attachment 3.

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a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
  - I. Requirements in Condition 3.1(a)(i).
  - II. Requirements in Condition 3.2(a), and 3.2(c).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

b. Semiannual Reporting

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

| <u>Monitoring Period</u> | <u>Report Due Date</u> |
|--------------------------|------------------------|
| January through June     | July 31                |
| July through December    | January 31             |

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

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**Section 4 - Emission Unit Requirement**

**4.1 Natural Gas Fired Engines**

**1. Emission Units and Operations**

| <i>Emission Units</i>                                    | <i>Pollutants Being Regulated</i>           | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|--|---|-----------------------------------|--|--|---------------------------|
| 01-ENG Cooper GMVC (1,000 HP, 2 cycle lean burn)         | SO <sub>2</sub>                             | 1966                              | N/A                                      | NONE   | NONE                      |
| 02-ENG Cooper GMVC (1,000 HP, 2 cycle lean burn)         | SO <sub>2</sub>                             | 1966                              | N/A                                      | NONE   | NONE                      |
| 03-ENG Clark TLA (2,500 HP, 2 cycle lean burn)           | SO <sub>2</sub>                             | 1969                              | N/A                                      | NONE   | NONE                      |
| 04-ENG Cooper GMVH-10 (2,500 HP, 2 cycle lean burn)      | SO <sub>2</sub>                             | 1972                              | N/A                                      | NONE   | NONE                      |
| 05-ENG Waukesha 12V-AT25GL (2,587 HP, 4 cycle lean burn) | CO, NO <sub>x</sub> , SO <sub>2</sub> , VOM | 1993                              | N/A                                      | NONE   | NONE                      |

**2. Applicable Requirements**

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. Opacity Requirements

A. 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 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the engines in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the engine, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

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C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with Method 9.

b. i. Sulfur Dioxide Requirements (SO<sub>2</sub>)

A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

ii. Compliance Method (SO<sub>2</sub> Requirements)

A. The monitoring requirements sufficient to meet 39.5(7)(d)(ii) of the Act are addressed by the operational and production requirements in Condition 4.1.2(f).

c. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to Construction Permit #91110071, the Permittee shall operate engine 5 (05-ENG) such that the Volatile Organic Material (VOM) emissions shall not exceed 7.18 tons/yr.

ii. Compliance Method (VOM Requirements)

Monitoring

A. Pursuant to 39.5(7)(a) of the Act, 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).

Testing

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall conduct a test of VOM emissions from the engine 5 (05-ENG) by using Method 25 within 18 months of the issuance of this permit and every 5 years thereafter. The Permittee shall comply with all applicable testing requirements of Section 7.1

Recordkeeping

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of VOM emissions with supporting calculations (tons/yr).

d. i. Carbon Monoxide Requirements (CO)

A. Pursuant to Construction Permit #91110071, the Permittee shall operate engine 5 (05-ENG) such that the Carbon Monoxide (CO) emissions shall not exceed 32.33 tons/yr.

ii. Compliance Method (CO Requirements)

Monitoring

A. Pursuant to 39.5(7)(a) of the Act, 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).

Testing

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall conduct a test of CO emissions from the engine 5 (05-ENG) by using Method 10 within 18

months of the issuance of this permit and every 5 years thereafter. The Permittee shall comply with all applicable testing requirements of Section 7.1.

Recordkeeping

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of CO emissions with supporting calculations (tons/yr).

e. i. Nitrogen Oxide Requirements (NO<sub>x</sub>)

A. Pursuant to Construction Permit #91110071, the Permittee shall operate engine 5 (05-ENG) such that the Nitrogen Oxide (NO<sub>x</sub>) emissions shall not exceed 24.44 tons/yr.

ii. Compliance Method (NO<sub>x</sub> Requirements)

Monitoring

A. Pursuant to 39.5(7)(a) of the Act, 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).

Testing

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall conduct a test of NO<sub>x</sub> emissions from the engine 5 (05-ENG) by using Method 7 or 7E within 18 months of the issuance of this permit and every 5 years thereafter. The Permittee shall comply with all applicable testing requirements of Section 7.1

Recordkeeping

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of NO<sub>x</sub> emissions with supporting calculations (tons/yr).

f. i. Operational and Production Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the engines.

B. Pursuant to Construction Permit #91110071, the Permittee shall only operate engine 5 (05-ENG) at a maximum of 5040 hours/yr. [T1]

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the type of fuel fired in the engines.

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the hours of operation of engine 5 (05-ENG) (hours/month and hours/year).

**3. Non-Applicability Determinations**

a. The engines are not subject to the New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ, because the engines commenced construction before June 12, 2006 pursuant to 40 CFR 60.4230(a)(4).

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- b. The engines are not subject to 35 IAC 212.321 or 212.322 Visible and Particulate Matter Emissions, due to the unique nature of such units, a process weight rate cannot be set so that such rules cannot reasonably be applied, pursuant to 35 IAC 212.323.
- c. The engines are not subject to 35 IAC 216.121 Carbon Monoxide Emissions, because the engines are not fuel combustion units as defined by 35 IAC 211.2470.
- d. The engines are not subject to 35 IAC 217.386(a) Nitrogen Oxide Emissions, because the engines are not located in a designated county.
- e. The engines are not subject to 35 IAC 215.301 Organic Material Emission Standards and Limitations because the engines do not use organic materials.
- f. The engines are no subject to 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines because the engines meet the requirements for exemption pursuant to 40 CFR 63.6600(c).
- g. The engines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for all pollutants, because the engines do not use an add-on control device to achieve compliance with an emission limitation or standard.

#### 4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

#### 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

##### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), 4.1.2(c)(i), 4.1.2(d)(i), 4.1.2(e)(i), and 4.1.2(f)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

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4.2 Amine Plants

**1. Emission Units and Operations**

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i>          | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i>       | <i>Monitoring Devices</i> |
|-----------------------|--|-----------------------------------|--|--|---------------------------|
| AMINE-1 Amine Plants  | VOM, SO <sub>2</sub> , CO, NO <sub>x</sub> | 1973                              | 1992                                     | Stretford Sulfur Recovery (STRET-1) and Flare (01-FLR) | NONE                      |

**2. Applicable Requirements**

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. Opacity Requirements

A. 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 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the amine plant in accordance with Method 9 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the amine plant maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 9. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. Volatile Organic Material Requirements (VOM)

A. Pursuant to Construction Permit #91110071, the Permittee shall not allow the emission of Volatile Organic Material (VOM) from the Flare to exceed the estimated 0.03 tons/yr. [T1]

ii. Compliance Method (VOM Requirements)

Monitoring

- A. Pursuant to 39.5(7)(a) of the Act, 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).

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of VOM emissions with supporting calculations (tons/yr).

c. i. Carbon Monoxide Requirements (CO)

- A. Pursuant to Construction Permit #91110071, the Permittee shall not allow the emission of Carbon Monoxide from the Flare to exceed the estimated 0.16 tons/yr. [T1]

ii. Compliance Method (CO Requirements)

Monitoring

- A. Pursuant to 39.5(7)(a) of the Act, 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).

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of CO emissions with supporting calculations (tons/mo and tons/yr).

d. i. Nitrogen Oxide Requirements (NO<sub>x</sub>)

- A. Pursuant to Construction Permit #91110071, the Permittee shall not allow the emission of Nitrogen Oxide (NO<sub>x</sub>) from the Flare to exceed the estimated 0.66 tons/yr. [T1]

ii. Compliance Method (NO<sub>x</sub> Requirements)

Monitoring

- A. Pursuant to 39.5(7)(a) of the Act, 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).

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of NO<sub>x</sub> emissions with supporting calculations (tons/mo and tons/yr).

e. i. Hydrogen Sulfide Requirements (H<sub>2</sub>S)

- A. Pursuant to Construction Permit #91110071 and 40 CFR 60 Subpart A, the Permittee shall not allow the emission of H<sub>2</sub>S to exceed 0.19 tons/yr from the flare, and shall comply with the requirements specified in 40 CFR 60.18.

ii. Compliance Method (H<sub>2</sub>S Requirements)

Monitoring

- A. Pursuant to 39.5(7) (a) of the Act, 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]

Recordkeeping

- B. Pursuant to 40 CFR 60.647, the Permittee shall:
- I. Maintain records of the calculations and measurements required in §60.642 (a) and (b) and §60.646 (a) through (g) and must retain them for at least 2 years following the date of the measurements. This requirement is included under §60.7(d) of the General Provisions.
  - II. Submit a written report of excess emissions to the Illinois EPA semiannually. For the purpose of these reports, excess emissions are defined as:
    1. Any 24-hour period (at consistent intervals) during which the average sulfur emission reduction efficiency (R) is less than the minimum required efficiency (Z).
    2. For any facility electing to comply with the provisions of §60.646(b) (2), any 24-hour period during which the average temperature of the gases leaving the combustion zone of an incinerator is less than the appropriate operating temperature as determined during the most recent performance test in accordance with the provisions of §60.646(b) (2). Each 24-hour period must consist of at least 96 temperature measurements equally spaced over the 24 hours.
- C. Each Permittee who elects to comply with §60.646(e) shall keep, for the life of the facility, a record demonstrating that the facility's design capacity is less than 150 LT/D of H<sub>2</sub>S expressed as sulfur.
- D. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the amine plant is subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.6 and Table 7.6.1, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Owner or Operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

f. i. Sulfur Dioxide Requirements (SO<sub>2</sub>)

- A. Pursuant to 40 CFR 60 Subparts A and LLL, the amine plant is subject to the NSPS for Onshore Natural Gas Processing, because the design capacity of this unit is greater than 2 long tons per day of hydrogen sulfide (H<sub>2</sub>S) and commenced construction or modification after January 20, 1984. The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA.
- I. Pursuant to 40 CFR 60.642(b), after demonstrating compliance with 40 CFR 60.642(b) and Condition 7.2.3(a) (i), the Permittee shall achieve, at a minimum, SO<sub>2</sub> emission reduction efficiency (Z<sub>c</sub>) determined from Table 1 found in 40 CFR 60.642(b) Subpart LLL.
- B. Pursuant to Construction Permit #91110071, the Permittee shall not allow the emission of Sulfur Dioxide (SO<sub>2</sub>) from the Flare to exceed the estimated 34.7 tons/yr. [T1]

ii. Compliance Method (SO<sub>2</sub>) Requirements

Monitoring

- A. Pursuant to 40 CFR 60.646(a) and (e) for the Amine Plant and Stretford Sulfur Recovery Unit, compliance shall be demonstrated in accordance with the alternate method of monitoring operations and emissions approved by the USEPA Region 5 letter of November 13, 2001. The alternate monitoring method proposed by the Permittee in its August 1, 2001 letter (Attachment 5) is incorporated in to the approval including the following:
- I. Pursuant to 40 CFR 60.646(a), the Permittee shall operate an H<sub>2</sub>S analyzer on the sour gas line that feeds the amine unit, an H<sub>2</sub>S analyzer on the line from the amine unit that feeds the natural gas pipeline, and a total sulfur monitor on the line from the Stretford unit to the flare. Each of these monitors shall be equipped with an auto-calibration feature that calibrates each monitor at least once per week to confirm that each monitor is operating properly.
- II. Pursuant to 40 CFR 60.646, the Permittee will measure the H<sub>2</sub>S concentration in the line feeding the amine unit and the line from the amine unit to the natural gas pipeline simultaneously once per hour. These hourly values will be used to calculate a 24-hour average for each line. Using the calculations specified in NGPL's August 1, 2001 letter, the 24-hour averages shall be used as a mass balance to determine the daily average H<sub>2</sub>S feed to the Stretford unit.
- III. Pursuant to 40 CFR 60.646, the Permittee shall measure the total sulfur in the line from the Stretford unit to the flare at least once per hour and calculate a 24-hour average from these values. On a daily basis, NGPL shall use these 24-hour average values and the daily average H<sub>2</sub>S feed to the Stretford unit to determine the actual SO<sub>2</sub> reduction efficiency.
- B. Pursuant to 39.5(7) (a) of the Act, 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).

Testing

- C. Pursuant to 40 CFR 60.8, the Permittee shall conduct a performance test to demonstrate compliance with 40 CFR 60.644. Compliance shall be demonstrated by determining the minimum required reduction efficiency (Z) of SO<sub>2</sub> emissions as required in 40 CFR 60.642(a) and from the equation found in 40 CFR 60.644(b) (1):
- D. Pursuant to 40 CFR 60.644(c), the Permittee shall determine compliance with the SO<sub>2</sub> standards in 40 CFR 60.642(a) or from the equation found in 40 CFR 60.644(c) (1):
- I. The emission rate (E) of sulfur shall be computed for each run by the equation found in 40 CFR 60.642(c) (3)
- D. Pursuant to 40 CFR 60.646(d), the Permittee shall obtain the information required by using the monitoring devices in 40 CFR 60.644(b) and (c).
- E. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall conduct a test of SO<sub>2</sub> emissions from the amine plant by using Method 6 or 6C within 18 months of the issuance of this permit and every 5 years thereafter. The Permittee shall comply with all applicable testing requirements of Section 7.1.

Recordkeeping

- F. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the following items for each sweetening unit to demonstrate compliance with Condition 4.2.2(d)(i):
  - I. Pursuant to 39.5(7)(d) of the Act, the Permittee shall maintain records of the calculations and measurements required in sections 4.2.2(d)(i) and 4.2.2(d)(ii)(E).
  - II. Pursuant to 40 CFR 60.647(d), the Permittee shall keep, for the life of the facility, a record demonstrating that the facility's design capacity is less than 150 LT/D of H<sub>2</sub>S expressed as sulfur.
- G. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of SO<sub>2</sub> emissions with supporting calculations (tons/yr).
- H. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the amine plant is subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.6 and Table 7.6.1, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Owner or Operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

g. i. Work Practice Requirements

- A. Pursuant to 40 CFR 63.11(b)(2), the flare shall be steam-assisted, air-assisted, or non-assisted.
- B. Pursuant to 40 CFR 63.11(b)(4), the flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
- C. Pursuant to 40 CFR 63.11(b)(6), the flare shall be either operated in accordance with the heat content specifications in 40 CFR 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR 63.11(b)(7) or (b)(8), or adhering to requirements in 40 CFR 63.11(b)(6)(i).

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to 40 CFR 63.11(b)(5), the flare shall be operated with a flame present at all times. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame and installed in proximity to the pilot light to indicate the presence of a flame.
- B. Pursuant to 40 CFR 63.11(b)(3), the flare shall be operated at all times when emissions may be vented to them.
- C. Pursuant to 40 CFR 63.11(b)(4), test Method 22 shall be used to determine the compliance of flares with the visible emission provisions of 40 CFR 63.11. The observation period is 2 hours and shall be used according to Method 22. Pursuant to Section 39.5(7)(a) of the Act, such visual emission observations shall be conducted at least monthly during operation of loading rack and flare.

- D. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall inspect flare's ignition system on an annual basis and detailed maintenance and repair inspection during the period when the flare is out of service and/or idled.

### 3. Non-Applicability Determinations

- a. The amine plant is not subject to 35 IAC 217.150 Nitrogen Oxide Emissions, because the amine plant is not in a designated county.
- b. The amine plant is not subject to the requirements of 35 IAC 212.321 and 212.322 Visible and Particulate Matter Emissions, because due to the unique nature of this unit, a process weight rate weight cannot be set so that such rules cannot reasonably be applied.
- c. The amine plant is not subject to 35 IAC 216 for Carbon Monoxide Emissions, because the amine plant is not a specified process in the part.
- d. The amine plant is not subject to 35 IAC 215.301 Organic Material Emission Standards and Limitations because pursuant to 35 IAC 215.302(a), the amine plant is controlled by a flare so as to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water.
- e. The amine plant is not subject to 35 IAC 214.301 Sulfur Limitations, because, pursuant to 35 IAC 214.302, the amine plant is designed to remove sulfur compounds from the flue gasses of fuel combustion emissions sources.

### 4. Other Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. Start-up Requirements

Pursuant to 35 IAC 201.149, 201.161, and 201.262, the source is authorized to operate in violation of the applicable requirements of Condition 4.2.2(f)(i)(A)(I) during startup, in which H<sub>2</sub>S is vented directly to the flare instead of the Stretford Sulfur Recovery Unit. The Permittee shall comply with all applicable requirements in Section 7.4 of this permit.

b. Malfunction Breakdown Requirements

Pursuant to 35 IAC 201.149, 201.161, and 201.262, the source is authorized to continue operation in violation of the applicable requirements of Condition 4.2.2(f)(i)(A)(I) during malfunction breakdown. The Permittee shall comply with all applicable requirements in Section 7.5 of this permit.

### 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), and 4.2.2(c)(i), 4.2.2(d)(i), 4.2.2(e)(i), 4.2.2(f)(i), and 4.2.2(g)(i).

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- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

b. Federal Reporting

- i. Pursuant to 40 CFR 60.647(d) Subpart LLL, the Permittee shall keep, for the life of the facility, a record demonstrating that the facility's design capacity is less than 150 LT/D of H<sub>2</sub>S expressed as sulfur.

4.3 Glycol Dehydration Units

**1. Emission Units and Operations**

| <i>Emission Units</i>                         | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|---|-----------------------------------|-----------------------------------|--|--|---------------------------|
| 1A-DHY Glycol Dehydration Unit #1A Still Vent | HAP,VOM                           | 1969                              | N/A                                      | Flare 01-FLR                                     | NONE                      |
| 2A-DHY Glycol Dehydration Unit #2A Still Vent | HAP,VOM                           | 1969                              | N/A                                      |  | NONE                      |
| 1B-DHY Glycol Dehydration Unit #1B Still Vent | HAP,VOM                           | 1973                              | N/A                                      |  | NONE                      |
| 2B-DHY Glycol Dehydration Unit #2B Still Vent | HAP,VOM                           | 1973                              | N/A                                      |  | NONE                      |
| 03-DHY Glycol Dehydration Unit #03 Still Vent | HAP,VOM                           | 1980                              | N/A                                      |  | NONE                      |

**2. Applicable Requirements**

For the emission units in Condition 4.3.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. Opacity Requirements

A. 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 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the glycol dehydration units in accordance with Method 9 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the glycol dehydration units, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 9. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

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C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 215.301, 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 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart G shall only apply to photochemically reactive material.

ii. Compliance Method (VOM Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform calculations of emissions from the glycol dehydration plant using GRI-GLYCalc™, version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual on at least a monthly basis. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration plant and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1).

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each calculation of VOM emissions performed. These records shall include, at a minimum: date the calculations were performed, the input parameters used, and the emissions from the triethylene glycol dehydration plant with supporting documentation.

c. i. Hazardous Air Pollutant Requirements (HAP)

A. Pursuant to 40 CFR 63.1275(b)(iii), the Permittee must limit BTEX emissions from each existing small glycol dehydration unit, as defined in 40 CFR 63.1271, to the limit determined in Equation 1 of 40 CFR 63 Subpart HHH. The limits determined using Equation 1, of 40 CFR 63 Subpart HHH, must be met in accordance with one of the alternatives specified in paragraphs 40 CFR 60.1275(b)(1)(iii)(A) through (D) of 40 CFR 63 Subpart HHH.

ii. Compliance Method (HAP Requirements)

Monitoring

A. Pursuant to 40 CFR 63.1283(c)(2)(i), the Permittee shall:

I. Per 40 CFR 63.1270(d)(3), an initial closed vent inspection is required by October 15, 2015. Starting no later than annually from the initial closed-vent inspection, the Permittee must conduct annual visual inspections for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in piping; loose connections; or broken missing caps or other closure devices. The Permittee shall monitor a component or connection using the procedures specified in 40 CFR 63.1282(b) to demonstrate that it operates with no detectable emissions following any time the component or connection is repaired or replaced or the connection is unsealed.

- B. Pursuant to 40 CFR 63.1282(a)(2)(i), at a minimum, the Permittee shall perform calculations of emissions from the glycol dehydration plant using GRI-GLYCalc™, version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual on at least a monthly basis. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration plant and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1).
- C. Pursuant to 40 CFR 63.1275(b)(1)(iii) the BTEX emissions from the outlet of the glycol dehydration unit process vent shall be determined using the procedures specified in paragraph 40 CFR 63.1275(d)(3)(v). As an alternative, the mass rate of BTEX at the outlet of the glycol dehydration unit process vent may be calculated using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and shall be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1). When the BTEX mass rate is calculated for glycol dehydration units using the model GRI-GLYCalc™, all BTEX measured by Method 18, 40 CFR Part 60, Appendix A, shall be summed.
- D. Pursuant to 40 CFR 63.1283(d)(3)(i)(C), the Permittee shall install, for the flare, a heat sensing monitoring device equipped with a continuous recorder that indicates the continuous ignition of the pilot flame.
- E. Pursuant to 40 CFR 63.1282(d)(2), the Permittee shall operate each flare, as defined in 40 CFR 63.1271, in accordance with the requirements specified in 40 CFR 63.11(b) and the compliance determination shall be conducted quarterly using Method 22 of 40 CFR Part 60, Appendix A, to determine visible emissions.

#### Recordkeeping

- F. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each calculation of HAP emissions performed. These records shall include, at a minimum: date the calculations were performed, the input parameters used, and the emissions from the triethylene glycol dehydration plant with supporting documentation.
- G. Pursuant to 40 CFR 63.1284(b), the Permittee shall maintain the records specified in in 40 CFR 63.1284(b)(1) through 40 CFR 63.1284(b)(10).
- H. Pursuant to 40 CFR 63.1284(e), the Permittee shall maintain a record of the following with regards to the flare:
  - i. Flare design (i.e., steam assisted, air-assisted, or non-assisted).
  - ii. All visible emission readings, heat content determinations, flowrate measurements, and exit velocity determinations made during the compliance determination required by 40 CFR 63.1282 d(2).
  - iii. All hourly records and other recorded periods when the pilot flame is absent.

### 3. Non-Applicability Determinations

- a. The dehydration units are not subject to the 40 CFR Part 63, Subpart HH: National Emission Standards for Hazardous Air Pollutants (NESHAP) from Oil and Natural Gas

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Production Facilities, because the natural gas pipeline station 206 is not oil and/or natural gas production facility, but rather a natural gas transmission and storage facility.

- b. The dehydration units are not subject to the requirements of 35 IAC 212.312 and 212.322 Visible and Particulate Matter Emissions because due to the unique nature of these units, a process weight rate weight cannot be set so that such rules cannot reasonably be applied.
- c. The dehydration units are not subject to the requirements of 35 IAC 216.100 Carbon Monoxide Emissions because the dehydration units, by their definition, are not fuel combustion units or incinerators.
- f. The glycol dehydration units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for all pollutants, because the glycol dehydration units are subject to 40 CFR Part 63 Subpart HHH. Units that are subject to emission limitations or standards proposed by the Illinois EPA after November 15, 1990, pursuant to section 111 and 112 of the Act are exempt from CAM.

#### 4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

#### 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

##### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.3.2(a)(i), 4.3.2(b)(i), and 4.3.2(c)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

##### b. Federal Reporting

- i. Pursuant to 40 CFR 63.1285(b), the Permittee shall submit the information listed in paragraphs 40 CFR 63.1285(b)(1) through (b)(6), which include:

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- A. The initial notifications required for existing affected sources under 40 CFR 63.63.9(b)(2) shall be submitted as provided in Conditions 4.4.5(b)(i)(A)(i) and 4.4.5(b)(i)(A)(ii).
- I. Except as otherwise provided in Condition 4.4.5(b)(i)(A)(ii), the initial notification shall be submitted by 1 year after an affected source becomes subject to the provisions of this subpart or by June 17, 2000, whichever is later. Affected sources that are major sources on or before June 17, 2000 and plan to be area sources by June 17, 2002 shall include in this notification a brief, nonbinding description of a schedule for the action(s) that are planned to achieve area source status.
- II. An affected source identified under 40 CFR 63.1270(d)(3) shall submit an initial notification required for existing affected sources under 40 CFR 63.9(b)(2) within 1 year after the affected source becomes subject to the provisions of this subpart or by October 15, 2013, whichever is later. An affected source identified under 40 CFR 63.1270(d)(3) that plans to be an area source by October 15, 2015, shall include in this notification a brief, nonbinding description of a schedule for the action(s) that are planned to achieve area source status.
- B. The date of the performance evaluation as specified in 40 CFR 63.8(e)(2), required only if the owner or operator is requested by the Illinois EPA to conduct a performance evaluation for a continuous monitoring system. A separate notification of the performance evaluation is not required if it is included in the initial notification submitted in accordance with Condition 4.4.5(b)(i)(a).
- C. The planned date of a performance test at least 60 days before the test in accordance with 40 CFR 63.7(b). Unless requested by the Illinois EPA, a site-specific test plan is not required by this subpart. If requested by the Illinois EPA, the owner or operator must also submit the site-specific test plan required by 40 CFR 63.7(c) with the notification of the performance test. A separate notification of the performance test is not required if it is included in the initial notification submitted in accordance with paragraph Condition 4.4.5(b)(i)(a).
- D. A Notification of Compliance Status Report as described in 40 CFR 63.1285(d).
- E. Periodic Reports as described in paragraph 40 CFR 63.1285(e) of this.
- F. Pursuant to 40 CFR 63.1285(e), if there was a malfunction during the reporting period, the periodic report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.1274(h), including actions taken to correct a malfunction.
- ii. Pursuant to 40 CFR 63.1285(e)(2)(iii), inspection results shall be submitted in the Periodic Report.

4.4 Steam Boilers and Reboilers

**1. Emission Units and Operations**

| <i>Emission Units</i>                  | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|--|-----------------------------------|-----------------------------------|--|--|---------------------------|
| 01-BOL Steam Boiler (8.0 mmBtu/hr)     | HAP                               | 1969                              | N/A                                      | NONE   | NONE                      |
| STRET-BOL Steam Boiler (6.28 mmBtu/hr) | HAP                               | 1995                              | N/A                                      | NONE   | NONE                      |
| Reboiler 1A (1A-RB) (3.0 mmBtu/hr)     | HAP                               | 1969                              | N/A                                      | NONE   | NONE                      |
| Reboiler 2A (2A-RB) (3.0 mmBtu/hr)     | HAP                               | 1973                              | N/A                                      | NONE   | NONE                      |

**2. Applicable Requirements**

For the emission units in Condition 4.4.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act.

a. Opacity Requirements

A. 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 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7) (b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the boilers in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the boilers, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. Work Practice Requirements

A. Pursuant to 40 CFR 63.7500(a) (1) and 40 CFR 63 Subpart DDDDD Table 3, the Permittee shall conduct a tune-up of the boilers biennially beginning no

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later than January 31, 2016, as specified in 40 CFR 63.7540. Pursuant to 40 CFR 63.7515(d), each biennial tune-up must be no more than 25 months after the previous tune-up. Pursuant to 40 CFR 63.7540(a)(13), if the boiler is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.

- B. Pursuant to 40 CFR 63.7540(a)(11), each biennial tune-up shall consist of:
- I. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled unit shutdown, but the Permittee must inspect each burner at least once every 36 months).
  - II. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
  - III. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. The Permittee may delay the inspection until the next scheduled unit shutdown.
  - IV. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
  - V. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).

ii. Compliance Method (Work Practice Requirements)

Recordkeeping

- A. Pursuant to 40 CFR 63.7540(a)(11), maintain records of each tune-up as follows:
- I. The concentrations of carbon monoxide in the effluent streams in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater.
  - II. A description of any corrective actions taken as a part of the tune-up.
  - III. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of the reporting requirements of 40 CFR 63.7550. See also Condition 4.4.5(b).

**3. Non-Applicability Determinations**

- a. The boilers are not subject to the New Source Performance Standards (NSPS) for Small Industrial Commercial Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc, because their design capacity is less than 10 mmBtu/hr, pursuant to 40 CFR 60.40c(a).

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- b. The boilers are not subject to 35 IAC 212.206 Visible and Particulate Matter Emissions, because the boilers do not use liquid fuel.
- c. The boilers are not subject to 35 IAC 214.161 Sulfur Limitations, because the steam boilers do not use liquid fuel.
- d. The boilers are not subject to 35 IAC 215.303 Organic Material Standards and Limitations, because the provisions of Sections 215.301 and 215.302 do not apply to fuel combustion emission sources.
- e. The boilers are not subject to 35 IAC 216.121 Carbon Monoxide Emissions, because the actual heat input is less than 10 mmBtu/hr.
- f. The boilers are not subject to 35 IAC 217.150 Nitrogen Oxide Emissions, because it is not in the areas specified, pursuant to 35 IAC 217.150(a)(1)(A).
- g. The boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.

#### 4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

#### 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

##### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.4.2(a)(i) and 4.4.2(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

##### b. Federal Reporting

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Section 4 - Emission Unit Requirements  
4.4 - Steam Boilers and Reboilers

- i. The Permittee shall submit the annual compliance reports, pursuant to 40 CFR 63.7550(b), no later than January 31 of each year following the compliance date of January 31, 2016.
- ii. The annual compliance reports shall contain the information required by 40 CFR 63.7550(c) (1) through (5).

4.5 Amine Boilers

**1. Emission Units and Operations**

| <i>Emission Units</i>                          | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|--|-----------------------------------|-----------------------------------|--|--|---------------------------|
| ACID-RBOL-1 Amine Boiler #1<br>(12.0 mmBtu/hr) | CO, HAP                           | 1967                              | N/A                                      | NONE   | NONE                      |
| ACID-RBOL-2 Amine Boiler #2<br>(12.0 mmBtu/hr) | CO, HAP                           | 1969                              | N/A                                      | NONE   | NONE                      |

**2. Applicable Requirements**

For the emission units in Condition 4.5.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act.

a. Opacity Requirements

A. 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 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7) (b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the amine plant in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the amine plant maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. Carbon Monoxide Requirements (CO)

A. Pursuant to air 35 IAC 216.121, the Permittee shall not allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air.

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ii. Compliance Method (CO Requirements)

Monitoring

A. For sufficient monitoring, see also Condition 4.5.2(c)(i) and (c)(ii).

c. i. Work Practice Requirements

- A. Pursuant to 40 CFR 63.7500(a)(3) and Section 39.5(7)(a) of the Act, at all times, the Permittee shall operate and maintain the boilers, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the IEPA that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the boilers.
- B. Pursuant to 40 CFR 63.7500(a)(1) and 40 CFR 63 Subpart DDDDD Table 3, the Permittee shall conduct a tune-up of the boiler annually beginning no later than January 31, 2016, as specified in 40 CFR 63.7540. Pursuant to 40 CFR 63.7515(d), each annual tune-up must be no more than 13 months after the previous tune-up. Pursuant to 40 CFR 63.7540(a)(13), if the boiler is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.
- C. Pursuant to 40 CFR 63.7540(a)(10)(i) through 63.7540(a)(10)(v), each biennial tune-up shall consist of:
- I. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled unit shutdown, but the Permittee must inspect each burner at least once every 36 months).
  - II. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
  - III. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. The Permittee may delay the inspection until the next scheduled unit shutdown.
  - IV. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
  - V. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).

ii. Compliance Method (Work Practice Requirements)

Recordkeeping

- A. Pursuant to 40 CFR 63.7540(a)(10)(vi)(A) through (C), maintain records of each tune-up as follows:
- I. The concentrations of carbon monoxide in the effluent streams in parts per million by volume, and oxygen in volume percent, measured

at high fire or typical operating load, before and after the tune-up of the boiler or process heater.

- II. A description of any corrective actions taken as a part of the tune-up.
  - III. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of the reporting requirements of 40 CFR 63.7550. See also Condition 4.5.5(b).

### 3. Non-Applicability Determinations

- a. The amine boilers are not subject to the New Source Performance Standards (NSPS) for Small Industrial Commercial Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc, because the subpart applies to steam generating units. The amine boilers are not steam generating units.
- b. The amine boilers are not subject to 35 IAC 212.206 Visible and Particulate Matter Emissions, because the amine boilers do not use liquid fuel.
- c. Pursuant to 35 IAC 215.303, the provisions of Sections 215.301 and 215.302 Organic Material Emission Standards and Limitations shall not apply to fuel combustion emission sources.
- d. The amine boilers are not subject to 35 IAC 217.150 Nitrogen Oxide Emissions, because it is not in the areas specified, pursuant to 35 IAC 217.150(a)(1)(A).
- e. The amine boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the amine boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.

### 4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

### 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

#### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.5.2(a)(i), 4.5.2(b)(i), and 4.5.2(c)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

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iii. The deviation reports shall contain at a minimum the following information:

- A. Date and time of the deviation.
- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

b. Federal Reporting

- i. The Permittee shall submit the annual compliance reports, pursuant to 40 CFR 63.7550(b), no later than January 31 of each year following the compliance date of January 31, 2016.
- ii. The annual compliance reports shall contain the information required by 40 CFR 63.7550(c)(1) through (5).

4.6 Natural Gas Fired Pipe Line Heaters

**1. Emission Units and Operations**

| <i>Emission Units</i>                    | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|--|-----------------------------------|-----------------------------------|--|--|---------------------------|
| 01-LHT Pipe Line Heater #1 (16 mmBtu/hr) | HAP, CO                           | 1992                              | N/A                                      | NONE   | NONE                      |
| 02-LHT Pipe Line Heater #2 (10 mmBtu/hr) | HAP, CO                           | 1975                              | N/A                                      | NONE   | NONE                      |
| 03-LHT Pipe Line Heater #3 (12 mmBtu/hr) | HAP, CO                           | 1969                              | N/A                                      | NONE   | NONE                      |

**2. Applicable Requirements**

For the emission units in Condition 4.6.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act.

a. i. Opacity Requirements

A. 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 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7) (b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the pipeline heaters in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the pipeline heaters, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Carbon Monoxide Requirements (CO)

A. Pursuant to 35 IAC 216.121, no Person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel emission source with

actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.

ii. Compliance Method (CO Requirements)

Monitoring

A. For sufficient monitoring, see Conditions 4.6.2(c)(i) and (c)(ii).

c. i. Work Practice Requirements

- A. Pursuant to 40 CFR 63.7500(a)(3) and Section 39.5(7)(a) of the Act, at all times, the Permittee shall operate and maintain the pipe line heaters, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the IEPA that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the pipe line heaters.
- B. Pursuant to 40 CFR 63.7500(a)(1) and 40 CFR 63 Subpart DDDDD Table 3, the Permittee shall conduct a tune-up of the pipeline heaters annually beginning no later than January 31, 2016, as specified in 40 CFR 63.7540. Pursuant to 40 CFR 63.7515(d), each annual tune-up must be no more than 13 months after the previous tune-up. Pursuant to 40 CFR 63.7540(a)(13), if the pipeline heaters are not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.
- C. Pursuant to 40 CFR 63.7540(a)(10)(i) through 63.7540(a)(10)(v), each biennial tune-up shall consist of:
- I. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled unit shutdown, but the Permittee must inspect each burner at least once every 36 months).
  - II. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
  - III. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. The Permittee may delay inspection until the next scheduled unit shutdown.
  - IV. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
  - V. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).

ii. Compliance Method (Work Practice Requirements)

Recordkeeping

- A. Pursuant to 40 CFR 63.7540(a)(10)(vi)(A) through (C), maintain records of each tune-up as follows:
- I. The concentrations of carbon monoxide in the effluent streams in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater.
  - II. A description of any corrective actions taken as a part of the tune-up.
  - III. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of the reporting requirements of 40 CFR 63.7550. See also Condition 4.6.5(b).

### 3. Non-Applicability Determinations

- a. The pipe line heaters are not subject to 35 IAC 212.206 Visible and Particulate Matter Emissions, because the pipe line heaters do not use liquid fuel.
- b. The pipe line heaters are not subject to 35 IAC 214.161 Sulfur Limitations, because the pipe line heaters do not use liquid fuel.
- c. Pursuant to 35 IAC 215.303, the provisions of Sections 215.301 and 215.302 Organic Material Emission Standards and Limitations shall not apply to fuel combustion emission sources.
- d. The pipe line heaters are not subject to 35 IAC 217.150 Nitrogen Oxide Emissions because it is not in the areas specified, pursuant to 35 IAC 217.150(a)(1)(A).
- e. The pipe line heaters are not subject to the National Emission Standard for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities (40 CFR 63 Subpart HHH) because the pipe line heaters are not glycol dehydration process units.
- f. The pipe line heaters are not subject to the New Source Performance Standard for Small - Industrial - Commercial - Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, because Subpart Dc applies to steam generating units. The pipe line heaters are process heaters; therefore, these rules do not apply.
- g. The pipe line heaters are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the pipe line heaters do not use an add-on control device to achieve compliance with an emission limitation or standard.

### 4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

### 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

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a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.6.2(a)(i), 4.6.2(b)(i), and 4.6.2(c)(i).
  - B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

b. Federal Reporting

- i. The Permittee shall submit the annual compliance reports, pursuant to 40 CFR 63.7550(b), no later than January 31 of each year following the compliance date of January 31, 2016.
- ii. The annual compliance reports shall contain the information required by 40 CFR 63.7550I(1) through (5).

4.7 Liquid Handling Equipment

**1. Emission Units and Operations**

| Emission Units                              | Pollutants Being Regulated | Original Construction Date | Modification/Reconstruction Date | Air Pollution Control Devices or Measures | Monitoring Devices |
|---|----------------------------|----------------------------|----------------------------------|---|--------------------|
| Three-Phase Separator                       | N/A                        | 2000                       | N/A                              | NONE                                      | NONE               |
| 1-5,000 bbl Oil/Water Storage Tank (T-WAT2) | N/A                        | 2010                       | N/A                              | NONE                                      | NONE               |

**2. Applicable Requirements**

For the emission units in Condition 4.6.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Operational and Production Requirements

- A. Pursuant to Construction Permit #10050049, throughput to the tank (T-WAT2) shall not exceed 183 million gallons/year, in total.
- B. Pursuant to Construction Permit #99050093, the tank (T-WAT2) shall only be used for storage of produced water.

ii. Compliance Method (Operational and Production Requirements)

Monitoring

- A. Pursuant to 39.5(7)(a) of the Act, 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).

Recordkeeping

- B. Pursuant to Construction Permit #10050049, the Permittee shall maintain records of total throughput of the tank.
- C. Pursuant to Construction Permit #10050049, the Permittee shall maintain files containing at a minimum the following information for the material in the tank:
  - I. An analysis showing the vapor pressure and molecular weight of the organic fraction of the liquid material.
  - II. An analysis showing the H<sub>2</sub>S content (lbs/gallon) of the organic fraction of the liquid material.
- D. Pursuant to Construction Permit #10050049, the Permittee shall maintain a file that contains a determination of the potential emissions of NO<sub>x</sub>, CO, VOM, and SO<sub>2</sub> from the tank (T-WAT2), with supporting data and calculations (pounds/hour and tons/year).

**3. Non-Applicability Determinations**

- a. The volatile organic liquid storage vessels is not subject to 35 IAC 212.321 or 212.322 Visible and Particulate Matter Emissions, due to the unique nature of such units, a process weight rate cannot be set so that such rules cannot reasonably be applied, pursuant to 35 IAC 212.32.

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- b. The liquid handling equipment is not subject to 35 IAC 216.121 Carbon Monoxide Emissions, because the liquid handling equipment is not a fuel combustion unit as defined by 35 IAC 211.2470.
- c. The liquid handling equipment is not subject to 35 IAC 217 386(a) Nitrogen Oxide Emissions, because the liquid handling equipment is not located in a designated county.
- d. The liquid handling equipment is not subject to 35 IAC 215.121 Storage Containers because the volatile organic liquid storage vessels store liquid with a vapor pressure less than 2.5 psia.
- e. The liquid handling equipment is not subject to 35 IAC 214.161 Sulfur Limitations, because the volatile organic liquid storage vessels do not use liquid fuel
- f. The liquid handling equipment is not subject to 40 CFR 60 Subpart Kb, New Source Performance Standards for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, because the vessels will only store liquids with a maximum true vapor pressure less than 3.5 kilopascals (kPa).
- g. The liquid handling equipment is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the volatile organic liquid storage vessels do not use an add-on control device to achieve compliance with an emission limitation or standard.

**4. Other Requirements**

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

**a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.7.2(a)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

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4.8 Loading Operations

**1. Emission Units and Operations**

| Emission Units | Pollutants Being Regulated                | Original Construction Date | Modification/Reconstruction Date | Air Pollution Control Devices or Measures | Monitoring Devices |
|----------------|---|----------------------------|----------------------------------|---|--------------------|
| Truck Loading  | VOM CO, SO <sub>2</sub> , NO <sub>x</sub> | 2000                       | N/A                              | Vapor Recovery System/Back-Up Flare       | NONE               |

**2. Applicable Requirements**

For the emission units in Condition 4.6.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Sulfur Dioxide Requirements (SO<sub>2</sub>)

A. Pursuant to Construction Permit #10050049, the Permittee shall not allow emissions of Sulfur Dioxide from the flare to exceed 1.3 tons/yr. [T1]

ii. Compliance Method (SO<sub>2</sub> Requirements)

Monitoring

A. Pursuant to 39.5(7)(a) of the Act, 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).

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of SO<sub>2</sub> emissions with supporting calculations (tons/mo and tons/yr).

b. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to Construction Permit #10050049, the Permittee shall not allow emissions of Volatile Organic Material (VOM) from the flare to exceed 0.10 tons/yr. [T1]

B. Pursuant to Construction Permit #99050093, the Permittee shall not allow Volatile Organic Material (VOM) emissions from the truck loading to exceed 1.7 tons/month and 20.1 tons/yr. [T1]

ii. Compliance Method (VOM Requirements)

Monitoring

A. Pursuant to 39.5(7)(a) of the Act, 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).

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of VOM emissions with supporting calculations (tons/month and tons/year).

- c. i. Nitrogen Oxide Requirements (NO<sub>x</sub>)
- A. Pursuant to Construction Permit #10050049, the Permittee shall not allow emissions of Nitrogen Oxide (NO<sub>x</sub>) from the flare to exceed 0.05 tons/yr. [T1]
- ii. Compliance Method (NO<sub>x</sub> Requirements)
- Monitoring
- A. Pursuant to 39.5(7)(a) of the Act, 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).
- Recordkeeping
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of NO<sub>x</sub> emissions with supporting calculations (tons/yr).
- d. i. Carbon Monoxide Requirements (CO)
- A. Pursuant to Construction Permit #10050049, the Permittee shall not allow emissions of Carbon Monoxide (CO) from the flare to exceed 0.28 tons/yr. [T1]
- ii. Compliance Method (CO Requirements)
- Monitoring
- A. Pursuant to 39.5(7)(a) of the Act, 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).
- Recordkeeping
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of CO emissions with supporting calculations (tons/yr).
- e. i. Operational and Production Requirements
- A. Pursuant to Construction Permit #99050093, the Permittee shall only operate the flare at a maximum of 504 hr/yr. [T1]
- B. Pursuant to Construction Permit #10050049, the flare shall be operated at all times that gasses are being sent to the flare. [T1]
- ii. Compliance Method (Operational and Production Requirements)
- Monitoring
- A. Pursuant to 39.5(7)(a) of the Act, 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).
- Recordkeeping
- B. Pursuant to Construction Permit #99050093, the Permittee shall keep monthly records of the operating time for the backup flare.
- C. Pursuant to Construction Permit #99050093, the Permittee shall keep monthly records of the throughput for all storage tanks.

- D. Pursuant to Construction Permit #99050093, the Permittee shall keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage tank.

### 3. Non-Applicability Determinations

- a. The loading operations are not subject to 35 IAC 212.321 or 212.322 Visible and Particulate Matter Emissions, due to the unique nature of such units, a process weight rate cannot be set so that such rules cannot reasonably be applied, pursuant to 35 IAC 212.32
- b. The loading operations are not subject to 35 IAC 216.121 Carbon Monoxide Emissions, because the volatile organic liquid storage vessels are not fuel combustion units as defined by 35 IAC 211.2470.
- c. The loading operations are not subject to 35 IAC 217 386(a) Nitrogen Oxide Emissions, because the volatile organic liquid storage vessels are not located in a designated county.
- d. The loading operations are not subject to 35 IAC 214.161 Sulfur Limitations, because the loading operations do not use liquid fuel.
- e. The loading operations are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the loading operations do not have potential pre-control emissions of a regulated air pollutant that are equal to or exceed major source thresholds.

### 4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

### 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

#### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.8.2(a)(i), 4.8.2(b)(i), 4.8.2(c)(i), 4.8.2(d)(i), and 4.8.2(e)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
- A. Date and time of the deviation.
- B. Emission unit(s) and/or operation involved.

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- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

**Section 5 - Additional Title I Requirements**

This Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.

## Section 6 - Insignificant Activities Requirements

**1. Insignificant Activities Subject to Specific Regulations**

Pursuant to 35 IAC 201.210 and 201.211, the following activities at the source constitute insignificant activities. Pursuant to Sections 9.1(d) and 39.5(6)(a) of the Act, the insignificant activities are subject to specific standards promulgated pursuant to Sections 111, 112, 165, or 173 of the Clean Air Act. The Permittee shall comply with the following applicable requirements:

| <i>Insignificant Activity</i>  | <i>Number of Units</i> | <i>Insignificant Activity Category</i> |
|--|------------------------|--|
| Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4). | 6                      | 35 IAC 201.210(a)(4)(A)                |
| Gas turbines and stationary reciprocating internal combustion engines < 112 kW (150 HP).   | 5                      | 35 IAC 201.210(a)(15)                  |
| Gas Turbines and Engines between 112 KW and 1,118 KW (150 and 1,500 HP) that are emergency or standby units.                     | 1                      | 35 IAC 201.210(a)(16)                  |

**a. Applicable Requirements**

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements in addition to the applicable requirements in Condition 6.4:

**i. New Source Performance Standard Requirements (NSPS)**

Pursuant to 40 CFR 63.7495(b), no later than March 21, 2014, the source must:

- I. Meet the applicable general provisions of 40 CFR 63 Subpart A. See Condition 7.3(a).
- II. Conduct a tune-up of the boilers biennially as specified in 40 CFR 63.7540, pursuant to 40 CFR 63.7500(a)(1) and 40 CFR 63 Subpart DDDDD Table 3. Pursuant to 40 CFR 63.7515(e), each biennial tune-up must be no more than 25 months after the previous tune-up.
- III. Must meet the applicable notification requirements of 40 CFR 63.7545 and 40 CFR Part 63 Subpart A.

**ii. National Emission Standards for Hazardous Air Pollutants (NESHAP)**

- A. Standards of Performance for Stationary Reciprocating Internal Combustion Engines (40 CFR 63 Subpart ZZZZ)
  - I. The engines shall meet the applicable emission limitations requirements of 40 CFR 63.6600.
  - II. The engines shall meet the applicable monitoring, installation, collection, operation, and maintenance requirements in 40 CFR 63.6625(i).
  - III. The engines shall meet the applicable compliance demonstration requirements in 40 CFR 6640(f).
  - IV. The engines shall meet the applicable record keeping requirements in 40 CFR 63.6655(f).

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**2. Insignificant Activities in 35 IAC 201.210(a)**

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

| <i>Insignificant Activity</i>   | <i>Number of Units</i> | <i>Insignificant Activity Category</i> |
|---|------------------------|--|
| Unpaved Road  | -                      | 35 IAC 201.210(a)(1) and 201.211       |
| Stretford Pond  | 1                      | 35 IAC 201.210(a)(1) and 201.211       |
| Corrosion Inhibitor Tank (CIT1)   | 1                      | 35 IAC 201.210(a)(1) and 201.211       |
| Amine Storage Tank  | 2                      | 35 IAC 201.210(a)(1) and 201.211       |
| SO1-SO32 (Schafer Operations)   | 32                     | 35 IAC 201.210(a)(1) and 201.211       |
| Slugcatcher   | 1                      | 35 IAC 201.210(a)(2) or (a)(3)         |
| Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).  | 16                     | 35 IAC 201.210(a)(4)                   |
| Storage tanks < 10,000 gallon with annual throughput < 100,000 gallon (not storing gasoline or any material listed as a HAP).   | 1                      | 35 IAC 201.210(a)(10)                  |
| Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oil.  | 14                     | 35 IAC 201.210(a)(11)                  |
| Any size storage tanks containing exclusively soaps, detergents, surfactants, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions where an organic solvent has not been mixed. | 1                      | 35 IAC 201.210(a)(17)                  |

**3. Insignificant Activities in 35 IAC 201.210(b)**

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

**4. Applicable Requirements**

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. 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 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 or 212.322 (see Conditions 7.2(a) and (b)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as

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provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.

- e. Pursuant to 35 IAC 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 215.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

**5. Compliance Method**

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).
- b. Potential to emit emission calculations before any air pollution control device for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

**6. Notification Requirements for Insignificant Activities**

The source shall notify the IEPA accordingly to the addition of insignificant activities:

**a. Notification 7 Days in Advance**

- i. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):
  - A. A description of the emission unit including the function and expected operating schedule of the unit.
  - B. A description of any air pollution control equipment or control measures associated with the emission unit.
  - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
  - D. The means by which emissions were determined or estimated.
  - E. The estimated number of such emission units at the source.
  - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.

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iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any addition of an insignificant activity noted above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

## Section 7 - Other Requirements

### 1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
- i. The name and identification of the emission unit(s) being tested.
  - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
  - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
  - iv. 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 emission unit and any control equipment will be determined.
  - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
  - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
  - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
  - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
  - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.5(7)(a) of the Act as follows:
- i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
  - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

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no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.5(7)(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
  - ii. A summary of results.
  - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
  - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
  - v. Detailed description of test conditions, including:
    - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
    - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
    - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
  - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
  - vii. An explanation of any discrepancies among individual tests or anomalous data.
  - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
  - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
  - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

**2. 40 CFR 60 Subpart A Requirements (NSPS)**

**a. 40 CFR 60 Subpart A and LLL - Standards of Performance for SO<sub>2</sub> Emissions from Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984 and on or before August 23, 2011**

Pursuant to 40 CFR 60 Subpart A and LLL, the Permittee shall comply with the following applicable General Provisions as indicated:

| <i>General Provision Citation</i> | <i>General Provision Applicable?</i> | <i>Subject of Citation</i>   | <i>Explanation (if required)</i> |
|-----------------------------------|--------------------------------------|--|----------------------------------|
| 40 CFR 60.1                       | Yes                                  | General Applicability of the General Provisions                    |                                  |
| 40 CFR 60.2                       | Yes                                  | Definitions  |                                  |
| 40 CFR 60.3                       | Yes                                  | Units and Abbreviations  |                                  |
| 40 CFR 60.4                       | Yes                                  | Address  |                                  |
| 40 CFR 60.5                       | Yes                                  | Determination of Construction or Modification                      |                                  |
| 40 CFR 60.6                       | Yes                                  | Review of Plans  |                                  |
| 40 CFR 60.7                       | Yes                                  | Notification and Recordkeeping                                     |                                  |
| 40 CFR 60.8                       | Yes                                  | Performance Tests  |                                  |
| 40 CFR 60.9                       | Yes                                  | Availability of Information  |                                  |
| 40 CFR 60.10                      | Yes                                  | State Authority  |                                  |
| 40 CFR 60.11                      | Yes                                  | Compliance with Standards and Maintenance Requirements             |                                  |
| 40 CFR 60.12                      | Yes                                  | Circumvention  |                                  |
| 40 CFR 60.13                      | Yes                                  | Monitoring Requirements  |                                  |
| 40 CFR 60.14                      | Yes                                  | Modification   |                                  |
| 40 CFR 60.15                      | Yes                                  | Reconstruction   |                                  |
| 40 CFR 60.16                      | Yes                                  | Priority List  |                                  |
| 40 CFR 60.17                      | Yes                                  | Incorporations by Reference  |                                  |
| 40 CFR 60.18                      | Yes                                  | General Control Device Requirements and Work Practice Requirements |                                  |
| 40 CFR 60.19                      | Yes                                  | General Notification and Reporting Requirements                    |                                  |

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**3. 40 CFR 63 Subpart A Requirements (NESHAP)**

**a. 40 CFR 63 Subpart A and ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

Pursuant to 40 CFR 63 Subpart A and Subpart ZZZZ, the Permittee shall comply with the following applicable General Provisions as indicated:

| General Provision Citation | General Provision Applicable? | Subject of Citation   | Explanation (if required)  |
|----------------------------|-------------------------------|---|--|
| 40 CFR 63.1                | Yes                           | General Applicability of the General Provisions                                   |  |
| 40 CFR 63.2                | Yes                           | Definitions   | Additional terms defined in 40 CFR 63.6675   |
| 40 CFR 63.3                | Yes                           | Units and Abbreviations   |  |
| 40 CFR 63.4                | Yes                           | Prohibited Activities and Circumvention   |  |
| 40 CFR 63.5                | Yes                           | Construction and reconstruction   |  |
| 40 CFR 63.6(a)             | Yes                           | Applicability   |  |
| 40 CFR 63.6(b)(1)-(4)      | Yes                           | Compliance dates for new and reconstructed sources                                |  |
| 40 CFR 63.6(b)(5)          | Yes                           | Notification  |  |
| 40 CFR 63.6(b)(6)          |                               | [Reserved]  |  |
| 40 CFR 63.6(b)(7)          | Yes                           | Compliance dates for new and reconstructed area sources that become major sources |  |
| 40 CFR 63.6(c)(1)-(2)      | No                            | Compliance dates for existing sources   |  |
| 40 CFR 63.6(c)(3)-(4)      |                               | [Reserved]  |  |
| 40 CFR 63.6(c)(5)          | Yes                           | Compliance dates for existing area sources that become major sources              |  |
| 40 CFR 63.6(d)             |                               | [Reserved]  |  |
| 40 CFR 63.6(e)             | No                            | Operation and maintenance   |  |
| 40 CFR 63.6(f)(1)          | No                            | Applicability of standards  |  |
| 40 CFR 63.6(f)(2)          | Yes.                          | Methods for determining compliance  |  |
| 40 CFR 63.6(f)(3)          | Yes.                          | Finding of compliance   |  |
| 40 CFR 63.6(g)(1)-(3)      | Yes.                          | Use of alternate standard   |  |
| 40 CFR 63.6(h)             | No                            | Opacity and visible emission standards  | Subpart ZZZZ does not contain opacity or visible emission standards.                         |
| 40 CFR 63.6(i)             | Yes.                          | Compliance extension procedures and criteria                                      |  |
| 40 CFR 63.6(j)             | Yes.                          | Presidential compliance exemption   |  |
| 40 CFR 63.7(a)(1)-(2)      | Yes                           | Performance test dates  | Subpart ZZZZ contains performance test dates at 40 CFR 40 CFR 63.6610, 63.6611, and 63.6612. |
| 40 CFR 63.7(a)(3)          | Yes.                          | CAA section 114 authority   |  |
| 40 CFR 63.7(b)(1)          | Yes                           | Notification of performance test  | Except that 40 CFR 63.7(b)(1) only applies as specified in 40 CFR 63.6645.                   |
| 40 CFR 63.7(b)(2)          | Yes                           | Notification of rescheduling  | Except that 40 CFR 63.7(b)(2) only applies as specified in 40 CFR 63.6645.                   |
| 40 CFR 63.7(c)             | Yes                           | Quality assurance/test plan   | Except that 40 CFR 63.7(c) only applies as specified in 40 CFR 63.6645.                      |
| 40 CFR 63.7(d)             | Yes.                          | Testing facilities  |  |
| 40 CFR 63.7(e)(1)          | No.                           | Conditions for conducting performance tests                                       | Subpart ZZZZ specifies conditions for conducting performance tests at 40 CFR 63.6620.        |

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Section 7 - Other Requirements  
7.3 - 40 CFR 63 Subpart A  
Requirements (NESHA)

| General Provision<br>Citation | General<br>Provision<br>Applicable? | Subject of Citation  | Explanation (if required)  |
|-------------------------------|-------------------------------------|--|--|
| 40 CFR 63.7(e) (2)            | Yes                                 | Conduct of performance tests and reduction of data                   | Subpart ZZZZ specifies test methods at 40 CFR 63.6620.   |
| 40 CFR 63.7(e) (3)            | Yes.                                | Test run duration  |  |
| 40 CFR 63.7(e) (4)            | Yes.                                | Administrator may require other testing under section 114 of the CAA |  |
| 40 CFR 63.7(f)                | Yes.                                | Alternative test method provisions                                   |  |
| 40 CFR 63.7(g)                | Yes.                                | Performance test data analysis, recordkeeping, and reporting         |  |
| 40 CFR 63.7(h)                | Yes.                                | Waiver of tests  |  |
| 40 CFR 63.8(a) (1)            | Yes                                 | Applicability of monitoring requirements                             | Subpart ZZZZ contains specific requirements for monitoring at 40 CFR 63.6625.  |
| 40 CFR 63.8(a) (2)            | Yes.                                | Performance specifications   |  |
| 40 CFR 63.8(a) (3)            |                                     | [Reserved]   |  |
| 40 CFR 63.8(a) (4)            | No.                                 | Monitoring for control devices                                       |  |
| 40 CFR 63.8(b) (1)            | Yes.                                | Monitoring   |  |
| 40 CFR 63.8(b) (2)-(3)        | Yes.                                | Multiple effluents and multiple monitoring systems                   |  |
| 40 CFR 63.8(c) (1)            | Yes.                                | Monitoring system operation and maintenance                          |  |
| 40 CFR 63.8(c) (1) (i)        | No                                  | Routine and predictable SSM  |  |
| 40 CFR 63.8(c) (1) (ii)       | Yes.                                | SSM not in Startup Shutdown Malfunction Plan                         |  |
| 40 CFR 63.8(c) (1) (iii)      | No                                  | Compliance with operation and maintenance requirements               |  |
| 40 CFR 63.8(c) (2)-(3)        | Yes.                                | Monitoring system installation                                       |  |
| 40 CFR 63.8(c) (4)            | Yes                                 | Continuous monitoring system (CMS) requirements                      | Except that subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS).   |
| 40 CFR 63.8(c) (5)            | No                                  | COMS minimum procedures  | Subpart ZZZZ does not require COMS.  |
| 40 CFR 63.8(c) (6)-(8)        | Yes                                 | CMS requirements   | Except that subpart ZZZZ does not require COMS.  |
| 40 CFR 63.8(d)                | Yes.                                | CMS quality control  |  |
| 40 CFR 63.8(e)                | Yes                                 | CMS performance evaluation   | Except for 40 CFR 63.8(e) (5) (ii), which applies to COMS. Except that 40 CFR 63.8(e) only applies as specified in 40 CFR 63.6645.                     |
| 40 CFR 63.8(f) (1)-(5)        | Yes                                 | Alternative monitoring method  | Except that 40 CFR 63.8(f) (4) only applies as specified in 40 CFR 63.6645.  |
| 40 CFR 63.8(f) (6)            | Yes                                 | Alternative to relative accuracy test                                | Except that 40 CFR 63.8(f) (6) only applies as specified in 40 CFR 63.6645.  |
| 40 CFR 63.8(g)                | Yes                                 | Data reduction   | Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at 40 CFR 40 CFR 63.6635 and 63.6640. |
| 40 CFR 63.9(a)                | Yes.                                | Applicability and State delegation of notification requirements      |  |
| 40 CFR 63.9(b) (1)-(5)        | Yes                                 | Initial notifications  | Except that 40 CFR 63.9(b) (3) is reserved. Except that 40 CFR 63.9(b) only applies as specified in 40 CFR 63.6645.                                    |
| 40 CFR 63.9(c)                | Yes                                 | Request for compliance extension                                     | Except that 40 CFR 63.9(c) only applies as specified in 40 CFR 63.6645.  |
| 40 CFR 63.9(d)                | Yes                                 | Notification of special compliance requirements for new sources      | Except that 40 CFR 63.9(d) only applies as specified in 40 CFR 63.6645.  |

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7.3 - 40 CFR 63 Subpart A  
Requirements (NESHAP)

| General Provision<br>Citation | General<br>Provision<br>Applicable? | Subject of Citation   | Explanation (if required)  |
|-------------------------------|-------------------------------------|---|--|
| 40 CFR 63.9(e)                | Yes                                 | Notification of performance test                                | Except that 40 CFR 63.9(e) only applies as specified in 40 CFR 63.6645.  |
| 40 CFR 63.9(f)                | No                                  | Notification of visible emission (VE)/opacity test              | Subpart ZZZZ does not contain opacity or VE standards.   |
| 40 CFR 63.9(g)(1)             | Yes                                 | Notification of performance evaluation                          | Except that 40 CFR 63.9(g) only applies as specified in 40 CFR 63.6645.  |
| 40 CFR 63.9(g)(2)             | No                                  | Notification of use of COMS data                                | Subpart ZZZZ does not contain opacity or VE standards.   |
| 40 CFR 63.9(g)(3)             | Yes                                 | Notification that criterion for alternative to RATA is exceeded | If alternative is in use. Except that 40 CFR 63.9(g) only applies as specified in 40 CFR 63.6645.  |
| 40 CFR 63.9(h)(1)-(6)         | Yes                                 | Notification of compliance status                               | Except that notifications for sources using a CEMS are due 30 days after completion of performance evaluations. 40 CFR 63.9(h)(4) is reserved. Except that 40 CFR 63.9(h) only applies as specified in 40 CFR 63.6645. |
| 40 CFR 63.9(i)                | Yes.                                | Adjustment of submittal deadlines                               |  |
| 40 CFR 63.9(j)                | Yes.                                | Change in previous information                                  |  |
| 40 CFR 63.10(a)               | Yes.                                | Administrative provisions for recordkeeping/reporting           |  |
| 40 CFR 63.10(b)(1)            | Yes                                 | Record retention  | Except that the most recent 2 years of data do not have to be retained on site.  |
| 40 CFR 63.10(b)(2)(i)-(v)     | No.                                 | Records related to SSM  |  |
| 40 CFR 63.10(b)(2)(vi)-(xi)   | Yes.                                | Records   |  |
| 40 CFR 63.10(b)(2)(xii)       | Yes.                                | Record when under waiver  |  |
| 40 CFR 63.10(b)(2)(xiii)      | Yes                                 | Records when using alternative to RATA                          | For CO standard if using RATA alternative.   |
| 40 CFR 63.10(b)(2)(xiv)       | Yes.                                | Records of supporting documentation                             |  |
| 40 CFR 63.10(b)(3)            | Yes.                                | Records of applicability determination                          |  |
| 40 CFR 63.10(c)               | Yes                                 | Additional records for sources using CEMS                       | Except that 40 CFR 63.10(c)(2)-(4) and (9) are reserved.   |
| 40 CFR 63.10(d)(1)            | Yes.                                | General reporting requirements                                  |  |
| 40 CFR 63.10(d)(2)            | Yes.                                | Report of performance test results                              |  |
| 40 CFR 63.10(d)(3)            | No                                  | Reporting opacity or VE observations                            | Subpart ZZZZ does not contain opacity or VE standards.   |
| 40 CFR 63.10(d)(4)            | Yes.                                | Progress reports  |  |
| 40 CFR 63.10(d)(5)            | No.                                 | Startup, shutdown, and malfunction reports                      |  |
| 40 CFR 63.10(e)(1) and (2)(i) | Yes.                                | Additional CMS Reports  |  |
| 40 CFR 63.10(e)(2)(ii)        | No                                  | COMS-related report   | Subpart ZZZZ does not require COMS.  |
| 40 CFR 63.10(e)(3)            | Yes.                                | Excess emission and parameter exceedances reports               | Except that 40 CFR 63.10(e)(3)(i)(C) is reserved.  |
| 40 CFR 63.10(e)(4)            | No                                  | Reporting COMS data   | Subpart ZZZZ does not require COMS.  |
| 40 CFR 63.10(f)               | Yes.                                | Waiver for recordkeeping/reporting                              |  |
| 40 CFR 63.11                  | No.                                 | Flares  |  |
| 40 CFR 63.12                  | Yes.                                | State authority and delegations                                 |  |
| 40 CFR 63.13                  | Yes.                                | Addresses   |  |
| 40 CFR 63.14                  | Yes.                                | Incorporation by reference                                      |  |
| 40 CFR 63.15                  | Yes.                                | Availability of information                                     |  |

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b. 40 CFR 63 Subpart A and DDDDD - Boilers National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Pursuant to 40 CFR 63 Subpart A and DDDDD, the Permittee shall comply with the following applicable General Provisions as indicated:

| <i>General Provision Citation</i>             | <i>Subject of Citation</i>  | <i>Applies to subpart DDDDD</i>   |
|---|---|---|
| 40 CFR 63.1                                   | General Applicability of the General Provisions   | Yes.  |
| 40 CFR 63.2                                   | Definitions   | Yes. Additional terms defined in 40 CFR 63.7575   |
| 40 CFR 63.3                                   | Units and Abbreviations   | Yes.  |
| 40 CFR 63.4                                   | Prohibited Activities and Circumvention   | Yes.  |
| 40 CFR 63.5                                   | Preconstruction Review and Notification Requirements  | Yes.  |
| 40 CFR 63.6(a), (b) (1)-(b) (5), (b) (7), (c) | Compliance with Standards and Maintenance Requirements  | Yes.  |
| 40 CFR 63.6(e) (1) (i)                        | General duty to minimize emissions.   | No. See 40 CFR 63.7500(a) (3) for the general duty requirement.   |
| 40 CFR 63.6(e) (1) (ii)                       | Requirement to correct malfunctions as soon as practicable.                                       | No.   |
| 40 CFR 63.6(e) (3)                            | Startup, shutdown, and malfunction plan requirements.   | No.   |
| 40 CFR 63.6(f) (1)                            | Startup, shutdown, and malfunction exemptions for compliance with non-opacity emission standards. | No.   |
| 40 CFR 63.6(f) (2) and (3)                    | Compliance with non-opacity emission standards.   | Yes.  |
| 40 CFR 63.6(g)                                | Use of alternative standards  | Yes.  |
| 40 CFR 63.6(h) (1)                            | Startup, shutdown, and malfunction exemptions to opacity standards.                               | No. See 40 CFR 63.7500(a).  |
| 40 CFR 63.6(h) (2) to (h) (9)                 | Determining compliance with opacity emission standards  | Yes.  |
| 40 CFR 63.6(i)                                | Extension of compliance   | Yes. Note: Facilities may also request extensions of compliance for the installation of combined heat and power, waste heat recovery, or gas pipeline or fuel feeding infrastructure as a means of complying with this subpart. |
| 40 CFR 63.6(j)                                | Presidential exemption.   | Yes.  |
| 40 CFR 63.7(a), (b), (c), and (d)             | Performance Testing Requirements  | Yes.  |
| 40 CFR 63.7(e) (1)                            | Conditions for conducting performance tests   | No. Subpart DDDDD specifies conditions for conducting performance tests at 40 CFR 63.7520(a) to (c).  |
| 40 CFR 63.7(e) (2)-(e) (9), (f), (g), and (h) | Performance Testing Requirements  | Yes.  |
| 40 CFR 63.8(a) and (b)                        | Applicability and Conduct of Monitoring   | Yes.  |

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7.3 - 40 CFR 63 Subpart A  
Requirements (NESHAP)

| General Provision Citation       | Subject of Citation  | Applies to subpart DDDDD   |
|----------------------------------|--|--|
| 40 CFR 63.8(c)(1)                | Operation and maintenance of CMS   | Yes.   |
| 40 CFR 63.8(c)(1)(i)             | General duty to minimize emissions and CMS operation                         | No. See 40 CFR 63.7500(a)(3).  |
| 40 CFR 63.8(c)(1)(ii)            | Operation and maintenance of CMS   | Yes.   |
| 40 CFR 63.8(c)(1)(iii)           | Startup, shutdown, and malfunction plans for CMS                             | No.  |
| 40 CFR 63.8(c)(2) to (c)(9)      | Operation and maintenance of CMS   | Yes.   |
| 40 CFR 63.8(d)(1) and (2)        | Monitoring Requirements, Quality Control Program                             | Yes.   |
| 40 CFR 63.8(d)(3)                | Written procedures for CMS   | Yes, except for the last sentence, which refers to a startup, shutdown, and malfunction plan. Startup, shutdown, and malfunction plans are not required. |
| 40 CFR 63.8(e)                   | Performance evaluation of a CMS  | Yes.   |
| 40 CFR 63.8(f)                   | Use of an alternative monitoring method.                                     | Yes.   |
| 40 CFR 63.8(g)                   | Reduction of monitoring data   | Yes.   |
| 40 CFR 63.9                      | Notification Requirements  | Yes.   |
| 40 CFR 63.10(a), (b)(1)          | Recordkeeping and Reporting Requirements                                     | Yes.   |
| 40 CFR 63.10(b)(2)(i)            | Recordkeeping of occurrence and duration of startups or shutdowns            | Yes.   |
| 40 CFR 63.10(b)(2)(ii)           | Recordkeeping of malfunctions  | No. See 40 CFR 63.7555(d)(7) for recordkeeping of occurrence and duration and 40 CFR 63.7555(d)(8) for actions taken during malfunctions.                |
| 40 CFR 63.10(b)(2)(iii)          | Maintenance records  | Yes.   |
| 40 CFR 63.10(b)(2)(iv) and (v)   | Actions taken to minimize emissions during startup, shutdown, or malfunction | No.  |
| 40 CFR 63.10(b)(2)(vi)           | Recordkeeping for CMS malfunctions   | Yes.   |
| 40 CFR 63.10(b)(2)(vii) to (xiv) | Other CMS requirements   | Yes.   |
| 40 CFR 63.10(b)(3)               | Recordkeeping requirements for applicability determinations                  | No.  |
| 40 CFR 63.10(c)(1) to (9)        | Recordkeeping for sources with CMS   | Yes.   |
| 40 CFR 63.10(c)(10) and (11)     | Recording nature and cause of malfunctions, and corrective actions           | No. See 40 CFR 63.7555(d)(7) for recordkeeping of occurrence and duration and 40 CFR 63.7555(d)(8) for actions taken during malfunctions.                |
| 40 CFR 63.10(c)(12) and (13)     | Recordkeeping for sources with CMS   | Yes.   |
| 40 CFR 63.10(c)(15)              | Use of startup, shutdown, and malfunction plan                               | No.  |
| 40 CFR 63.10(d)(1) and (2)       | General reporting requirements   | Yes.   |

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|--|--|---|
| 40 CFR 63.10(d)(3)   | Reporting opacity or visible emission observation results  | No.   |
| 40 CFR 63.10(d)(4)   | Progress reports under an extension of compliance  | Yes.  |
| 40 CFR 63.10(d)(5)   | Startup, shutdown, and malfunction reports   | No. See 40 CFR 63.7550(c)(11) for malfunction reporting requirements. |
| 40 CFR 63.10(e)  | Additional reporting requirements for sources with CMS   | Yes.  |
| 40 CFR 63.10(f)  | Waiver of recordkeeping or reporting requirements  | Yes.  |
| 40 CFR 63.11   | Control Device Requirements  | No.   |
| 40 CFR 63.12   | State Authority and Delegation   | Yes.  |
| 40 CFR 63.13-63.16   | Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions | Yes.  |
| 40 CFR 63.1(a)(5), (a)(7)-(a)(9), (b)(2), (c)(3)-(4), (d), 63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (h)(5)(iv), 63.8(a)(3), 63.9(b)(3), (h)(4), 63.10(c)(2)-(4), (c)(9). | Reserved   | No.   |

c. 40 CFR 63 Subpart A and HHH - National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities

| General Provision Citation       | Applicable to subpart HHH | Explanation                          |
|----------------------------------|---------------------------|--------------------------------------|
| 40 CFR 63.1(a)(1)                | Yes.                      |                                      |
| 40 CFR 63.1(a)(2)                | Yes.                      |                                      |
| 40 CFR 63.1(a)(3)                | Yes.                      |                                      |
| 40 CFR 63.1(a)(4)                | Yes.                      |                                      |
| 40 CFR 63.1(a)(5)                | No                        | Section reserved.                    |
| 40 CFR 63.1(a)(6) through (a)(8) | Yes.                      |                                      |
| 40 CFR 63.1(a)(9)                | No                        | Section reserved.                    |
| 40 CFR 63.1(a)(10)               | Yes.                      |                                      |
| 40 CFR 63.1(a)(11)               | Yes.                      |                                      |
| 40 CFR 63.1(a)(12)               | Yes.                      |                                      |
| 40 CFR 63.1(b)(1)                | No                        | Subpart HHH specifies applicability. |
| 40 CFR 63.1(b)(2)                | Yes.                      |                                      |
| 40 CFR 63.1(b)(3)                | No.                       |                                      |

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| General Provision Citation | Applicable to subpart HHH | Explanation   |
|----------------------------|---------------------------|---|
| 40 CFR 63.1(c) (1)         | No                        | Subpart HHH specifies applicability.  |
| 40 CFR 63.1(c) (2)         | No.                       |   |
| 40 CFR 63.1(c) (3)         | No                        | Section reserved.   |
| 40 CFR 63.1(c) (4)         | Yes.                      |   |
| 40 CFR 63.1(c) (5)         | Yes.                      |   |
| 40 CFR 63.1(d)             | No                        | Section reserved.   |
| 40 CFR 63.1(e)             | Yes.                      |   |
| 40 CFR 63.2                | Yes                       | Except definition of major source is unique for this source category and there are additional definitions in subpart HHH. |
| 40 CFR 63.3(a) through (c) | Yes.                      |   |
| 40 CFR 63.4(a) (1)         | Yes                       |   |
| 40 CFR 63.4(a) (2)         | Yes                       |   |
| 40 CFR 63.4(a) (3)         | No                        | Section reserved.   |
| 40 CFR 63.4(a) (4)         | No                        | Section reserved.   |
| 40 CFR 63.4(a) (5)         | No                        | Section reserved.   |
| 40 CFR 63.4(b)             | Yes.                      |   |
| 40 CFR 63.4(c)             | Yes.                      |   |
| 40 CFR 63.5(a) (1)         | Yes.                      |   |
| 40 CFR 63.5(a) (2)         | No                        | Preconstruction review required only for major sources that commence construction after promulgation of the standard.     |
| 40 CFR 63.5(b) (1)         | Yes.                      |   |
| 40 CFR 63.5(b) (2)         | No                        | Section reserved.   |
| 40 CFR 63.5(b) (3)         | Yes.                      |   |
| 40 CFR 63.5(b) (4)         | Yes.                      |   |
| 40 CFR 63.5(b) (5)         | No                        | Section reserved.   |
| 40 CFR 63.5(b) (6)         | Yes.                      |   |
| 40 CFR 63.5(c)             | No                        | Section reserved.   |
| 40 CFR 63.5(d) (1)         | Yes.                      |   |

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| General Provision Citation   | Applicable to subpart HHH | Explanation   |
|------------------------------|---------------------------|---|
| 40 CFR 63.5(d)(2)            | Yes.                      |   |
| 40 CFR 63.5(d)(3)            | Yes.                      |   |
| 40 CFR 63.5(d)(4)            | Yes.                      |   |
| 40 CFR 63.5(e)               | Yes.                      |   |
| 40 CFR 63.5(f)(1)            | Yes.                      |   |
| 40 CFR 63.5(f)(2)            | Yes.                      |   |
| 40 CFR 63.6(a)               | Yes.                      |   |
| 40 CFR 63.6(b)(1)            | Yes.                      |   |
| 40 CFR 63.6(b)(2)            | Yes.                      |   |
| 40 CFR 63.6(b)(3)            | Yes.                      |   |
| 40 CFR 63.6(b)(4)            | Yes.                      |   |
| 40 CFR 63.6(b)(5)            | Yes.                      |   |
| 40 CFR 63.6(b)(6)            | No                        | Section reserved.                                   |
| 40 CFR 63.6(b)(7)            | Yes.                      |   |
| 40 CFR 63.6(c)(1)            | Yes.                      |   |
| 40 CFR 63.6(c)(2)            | Yes.                      |   |
| 40 CFR 63.6(c)(3) and (c)(4) | No                        | Section reserved.                                   |
| 40 CFR 63.6(c)(5)            | Yes.                      |   |
| 40 CFR 63.6(d)               | No                        | Section reserved.                                   |
| 40 CFR 63.6(e)               | Yes.                      |   |
| 40 CFR 63.6(e)               | Yes                       | Except as otherwise specified.                      |
| 40 CFR 63.6(e)(1)(i)         | No                        | See 40 CFR 63.1274(h) for general duty requirement. |
| 40 CFR 63.6(e)(1)(ii)        | No.                       |   |
| 40 CFR 63.6(e)(1)(iii)       | Yes.                      |   |
| 40 CFR 63.6(e)(2)            | No                        | Section reserved.                                   |
| 40 CFR 63.6(e)(3)            | No.                       |   |
| 40 CFR 63.6(f)(1)            | No.                       |   |
| 40 CFR 63.6(f)(2)            | Yes.                      |   |

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| General Provision Citation          | Applicable to subpart HHH | Explanation   |
|-------------------------------------|---------------------------|---|
| 40 CFR 63.6(f) (3)                  | Yes.                      |   |
| 40 CFR 63.6(g)                      | Yes.                      |   |
| 40 CFR 63.6(h) (1)                  | No.                       |   |
| 40 CFR 63.6(h) (2)                  | Yes.                      |   |
| 40 CFR 63.6(h) (3)                  | No                        | Section reserved.   |
| 40 CFR 63.6(h) (4) through (h) (9)  | Yes.                      |   |
| 40 CFR 63.6(i) (1) through (i) (14) | Yes.                      |   |
| 40 CFR 63.6(i) (15)                 | No                        | Section reserved.   |
| 40 CFR 63.6(i) (16)                 | Yes.                      |   |
| 40 CFR 63.6(j)                      | Yes.                      |   |
| 40 CFR 63.7(a) (1)                  | Yes.                      |   |
| 40 CFR 63.7(a) (2)                  | Yes                       | But the performance test results must be submitted within 180 days after the compliance date. |
| 40 CFR 63.7(a) (3)                  | Yes.                      |   |
| 40 CFR 63.7(a) (4)                  | Yes.                      |   |
| 40 CFR 63.7(b)                      | Yes.                      |   |
| 40 CFR 63.7(c)                      | Yes.                      |   |
| 40 CFR 63.7(d)                      | Yes.                      |   |
| 40 CFR 63.7(e) (1)                  | No.                       |   |
| 40 CFR 63.7(e) (2)                  | Yes.                      |   |
| 40 CFR 63.7(e) (3)                  | Yes.                      |   |
| 40 CFR 63.7(e) (4)                  | Yes.                      |   |
| 40 CFR 63.7(f)                      | Yes.                      |   |
| 40 CFR 63.7(g)                      | Yes.                      |   |
| 40 CFR 63.7(h)                      | Yes.                      |   |
| 40 CFR 63.8(a) (1)                  | Yes.                      |   |
| 40 CFR 63.8(a) (2)                  | Yes.                      |   |
| 40 CFR 63.8(a) (3)                  | No                        | Section reserved.   |

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| General Provision Citation       | Applicable to subpart HHH | Explanation   |
|----------------------------------|---------------------------|---|
| 40 CFR 63.8(a)(4)                | Yes.                      |   |
| 40 CFR 63.8(b)(1)                | Yes.                      |   |
| 40 CFR 63.8(b)(2)                | Yes.                      |   |
| 40 CFR 63.8(b)(3)                | Yes.                      |   |
| 40 CFR 63.8(c)(1)                | Yes.                      |   |
| 40 CFR 63.8(c)(1)(i)             | No.                       |   |
| 40 CFR 63.8(c)(1)(ii)            | Yes.                      |   |
| 40 CFR 63.8(c)(1)(iii)           | No.                       |   |
| 40 CFR 63.8(c)(2)                | Yes.                      |   |
| 40 CFR 63.8(c)(3)                | Yes.                      |   |
| 40 CFR 63.8(c)(4)                | No.                       |   |
| 40 CFR 63.8(c)(5) through (c)(8) | Yes.                      |   |
| 40 CFR 63.8(d)(1)                | Yes.                      |   |
| 40 CFR 63.8(d)(2)                | Yes.                      |   |
| 40 CFR 63.8(d)(3)                | Yes                       | Except for last sentence, which refers to an SSM plan. SSM plans are not required.  |
| 40 CFR 63.8(e)                   | Yes                       | Subpart HHH does not specifically require continuous emissions monitor performance evaluations, however, the Administrator can request that one be conducted. |
| 40 CFR 63.8(f)(1) through (f)(5) | Yes.                      |   |
| 40 CFR 63.8(f)(6)                | No                        | Subpart HHH does not require continuous emissions monitoring.   |
| 40 CFR 63.8(g)                   | No                        | Subpart HHH specifies continuous monitoring system data reduction requirements.   |
| 40 CFR 63.9(a)                   | Yes.                      |   |
| 40 CFR 63.9(b)(1)                | Yes.                      |   |
| 40 CFR 63.9(b)(2)                | Yes                       | Existing sources are given 1 year (rather than 120 days) to submit this notification.   |
| 40 CFR 63.9(b)(3)                | No                        | Section reserved.   |
| 40 CFR 63.9(b)(4)                | Yes.                      |   |
| 40 CFR 63.9(b)(5)                | Yes.                      |   |
| 40 CFR 63.9(c)                   | Yes.                      |   |

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|--|---------------------------|---|
| 40 CFR 63.9(d)                                 | Yes.                      |   |
| 40 CFR 63.9(e)                                 | Yes.                      |   |
| 40 CFR 63.9(f)                                 | Yes.                      |   |
| 40 CFR 63.9(g)                                 | Yes.                      |   |
| 40 CFR 63.9(h) (1) through (h) (3)             | Yes.                      |   |
| 40 CFR 63.9(h) (4)                             | No                        | Section reserved.   |
| 40 CFR 63.9(h) (5) and (h) (6)                 | Yes.                      |   |
| 40 CFR 63.9(i)                                 | Yes.                      |   |
| 40 CFR 63.9(j)                                 | Yes.                      |   |
| 40 CFR 63.10(a)                                | Yes.                      |   |
| 40 CFR 63.10(b) (1)                            | Yes                       | Section 63.1284(b) (1) requires sources to maintain the most recent 12 months of data on-site and allows offsite storage for the remaining 4 years of data. |
| 40 CFR 63.10(b) (2)                            | Yes.                      |   |
| 40 CFR 63.10(b) (2) (i)                        | No.                       |   |
| 40 CFR 63.10(b) (2) (ii)                       | No                        | See 40 CFR 63.1284(f) for recordkeeping of (1) occurrence and duration and (2) actions taken during malfunction.  |
| 40 CFR 63.10(b) (2) (iii)                      | Yes.                      |   |
| 40 CFR 63.10(b) (2) (iv) through (b) (2) (v)   | No.                       |   |
| 40 CFR 63.10(b) (2) (vi) through (b) (2) (xiv) | Yes.                      |   |
| 40 CFR 63.10(b) (3)                            | No.                       |   |
| 40 CFR 63.10(c) (1)                            | Yes.                      |   |
| 40 CFR 63.10(c) (2) through (c) (4)            | No                        | Sections reserved.  |
| 40 CFR 63.10(c) (5) through (c) (8)            | Yes.                      |   |
| 40 CFR 63.10(c) (9)                            | No                        | Section reserved.   |
| 40 CFR 63.10(c) (10) through (c) (11)          | No                        | See 40 CFR 63.1284(f) for recordkeeping of malfunctions.  |
| 40 CFR 63.10(c) (12) through (c) (14)          | Yes.                      |   |
| 40 CFR 63.10(c) (15)                           | No.                       |   |
| 40 CFR 63.10(d) (1)                            | Yes.                      |   |

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Section 7 - Other Requirements  
7.3 - 40 CFR 63 Subpart A  
Requirements (NESHAP)

| General Provision Citation                  | Applicable to subpart HHH | Explanation  |
|---|---------------------------|--|
| 40 CFR 63.10(d)(2)                          | Yes.                      |  |
| 40 CFR 63.10(d)(3)                          | Yes.                      |  |
| 40 CFR 63.10(d)(4)                          | Yes.                      |  |
| 40 CFR 63.10(d)(5)                          | No                        | See 40 CFR 63.1285(b)(6) for reporting of malfunctions.                      |
| 40 CFR 63.10(e)(1)                          | Yes.                      |  |
| 40 CFR 63.10(e)(2)                          | Yes.                      |  |
| 40 CFR 63.10(e)(3)(i)                       | Yes                       | Subpart HHH requires major sources to submit Periodic Reports semi-annually. |
| 40 CFR 63.10(e)(3)(i)(A)                    | Yes.                      |  |
| 40 CFR 63.10(e)(3)(i)(B)                    | Yes.                      |  |
| 40 CFR 63.10(e)(3)(i)(C)                    | No                        | Section reserved.  |
| 40 CFR 63.10(e)(3)(i)(D)                    | Yes.                      |  |
| 40 CFR 63.10(e)(3)(ii) through (e)(3)(viii) | Yes.                      |  |
| 40 CFR 63.10(f)                             | Yes.                      |  |
| 40 CFR 63.11(a) through (e)                 | Yes.                      |  |
| 40 CFR 63.12(a) through (c)                 | Yes.                      |  |
| 40 CFR 63.13(a) through (c)                 | Yes.                      |  |
| 40 CFR 63.14(a) through (q)                 | Yes.                      |  |
| 40 CFR 63.15(a) and (b)                     | Yes.                      |  |

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**4. Startup Requirements**

**a. Startup Provisions**

Pursuant to 35 IAC 201.149, 201.261, and 201.262, the source is authorized to operate in violation of the applicable requirements (as referenced in Section 4.2.4 of this CAAPP permit) during startup. The source has applied for such authorization in its application, generally describing the efforts that will be used "...to minimize startup emissions, duration of individual starts, and frequency of startups." As provided by 35 IAC 201.265, authorization in this CAAPP permit for excess emissions during startup does not shield the source from enforcement for any violation of applicable emission standard(s) that occurs during startup and only constitutes a prima facie defense to such an enforcement action provided that the source has fully complied with all terms and conditions connected with such authorization.

- i. This authorization does not relieve the source from the continuing obligation to demonstrate that all reasonable efforts are made to minimize startup emissions, duration of individual starts, and frequency of startups.
- ii. The source shall conduct startups in accordance with written startup procedures prepared by the source and maintained at the source, that are specifically developed to minimize startup emissions, duration of individual starts, and frequency of startups.

**b. Monitoring - Recordkeeping**

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain the following recordkeeping requirements for startup procedures:

- i. A copy of the most recent startup procedures that contains at a minimum:
  - A. Estimates of excess emissions for sulfur dioxide at startup.
  - B. Reasonable steps that will be used to minimize startup emissions, duration of individual starts, and frequency of startups.
- ii. Records for each individual startup that contains at a minimum:
  - A. Date, time, duration, and description of the startup.
  - B. Whether the most recent startup procedures were performed. If not performed, an explanation why the procedures were not performed.
  - C. An explanation of whether emissions during the startup exceeded the estimates in the startup procedures and whether emissions exceeded any applicable standard or limit not authorized to be violated during startup.

**c. Monitoring - Reporting**

Pursuant to Sections 39.5(7)(b) and (f) of the Act, the source shall submit the following reporting requirements:

**i. Prompt Reporting**

A Deviation Report shall be submitted to the IEPA, Compliance Section (addresses are included Attachment 3) within five (5) days if a startup exceeded the emission estimates in the startup procedures or emissions exceeded any applicable standard or limit not authorized to be violated during startup.

ii. Semiannual Reporting

As part of the required Semiannual Monitoring Reports, the source shall submit a startup report including the following at a minimum: a list of the startups including the date, duration, and description of each startup accompanied by any explanations whether the most recent startup procedures were or were not performed and whether normal operation was or was not achieved in the allowed duration.

**5. Malfunction Breakdown Requirements**

**a. Malfunction Breakdown Provisions**

Pursuant to 35 IAC 201.149, 201.161, and 201.262, the source is authorized to continue operation in violation of the applicable requirements (as referenced in Section 4.2.4 of the CAAPP permit) during malfunction or breakdown. The source has applied for such authorization in its application, generally describing "such continued operation is necessary to prevent injury to persons or severe damage to equipment; or that such continued operation is required to provide essential services; provided, however, that continued operation solely for the economic benefit of the source shall not be sufficient for granting of permission." As provided by 35 IAC 201.265, authorization in this CAAPP permit for continued operation during malfunction or breakdown does not shield the source from enforcement for any violation of applicable emission standard(s) that occurs during malfunction or breakdown and only constitutes a prima facie defense to such an enforcement action provided that the source has fully complied with all terms and conditions connected with such authorization.

- i. Upon continued operation in violation of the applicable requirements during malfunction or breakdown, the source shall as soon as practical, remove from service and repair the emission unit(s) or undertake other measures as described in the application so that any violation of the applicable requirements cease.
- ii. For continued operation in violation of the applicable requirements during malfunction or breakdown, the time shall be measured from the start of a particular incident and ends when violation of the applicable requirements ceases. The absence of a violation of the applicable requirements for a short period shall not be considered to end the incident if a violation of the applicable requirements resume. In such circumstances, the incident shall be considered to continue until corrective measures are taken so that a violation of the applicable requirements cease or the source takes the emission unit(s) out of service.
- iii. Following notification to the IEPA of continued operation in violation of the applicable requirements during malfunction or breakdown, the source shall comply with all reasonable directives of the IEPA with respect to such incident, pursuant to 35 IAC 201.263.

**b. Monitoring - Recordkeeping**

Pursuant to Section 39.5(7)(b) of the Act and 35 IAC 201.263, the source shall maintain records of continued operation in violation of the applicable requirements during malfunction or breakdown shall include at a minimum:

- i. A malfunction breakdown plan that includes the following at a minimum:
  - A. Estimates of typical emissions during malfunction or breakdown.
  - B. Reasonable steps that will be taken to minimize emissions, duration, and frequency of malfunction or breakdown.
- ii. Date and duration of the malfunction or breakdown.
- iii. A detailed explanation of the malfunction or breakdown.
- iv. An explanation why the emission unit(s) continued operation.
- v. The measures used to reduce the emissions and the duration of the event.
- vi. The steps taken to prevent similar malfunctions or breakdowns and reduce their frequency and severity.

- vii. An explanation of whether emissions during malfunction or breakdown were above typical emissions in the malfunction or breakdown procedures and whether emissions exceeded any applicable requirements.

c. Monitoring - Reporting

Pursuant to Sections 39.5(7)(b) and (f) of the Act and 35 IAC 201.263, the source shall provide the following notification and reports to the IEPA, Compliance Section and Regional Field Office (addresses are included in Attachment 3) concerning continued operation in violation of the applicable requirements during malfunction or breakdown:

i. Prompt Reporting

When continued operation in violation of the applicable requirements during malfunction or breakdown:

- A. The source shall notify the IEPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunction or breakdown.
- B. Upon achievement of compliance, the source shall give a written follow-up notice within 15 days to the IEPA, Air Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation was necessary, the length of time during which operation continued under such conditions, the measures taken by the source to minimize and correct deficiencies with chronology, and when the repairs were completed or when the unit(s) was taken out of service.
- C. If compliance is not achieved within 5 working days of the occurrence, the source shall submit interim status reports to the IEPA, Air Compliance Section and Regional Field Office, within 5 days of the occurrence and every 14 days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete or the emission unit(s) will be taken out of service.

ii. Semiannual Reporting

As part of the required Semiannual Monitoring Reports, the source shall submit a semiannual malfunction breakdown report including the following at a minimum:

- A. A listing of all malfunctions and breakdowns, in chronological order, that includes: the date, time, and duration of each incident; and identity of the affected operation(s) involved in the incident.
- B. Dates of the notices and reports required by Prompt Reporting requirements of 7.5(c)(i) above.
- C. The aggregate duration of all incidents during the reporting period.
- D. If there have been no such incidents during the reporting period, this shall be stated in the report.

**6. Compliance Assurance Monitoring (CAM) Requirements**

**a. CAM Provisions**

**i. Proper Maintenance**

Pursuant to 40 CFR 64.7(b), at all times, the source shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

**ii. Continued Operation**

Pursuant to 40 CFR 64.7(c), except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the source shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit (PSEU) is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The source shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

**iii. Response to Excursions or Exceedances**

A. Pursuant to 40 CFR 64.7(d)(1), upon detecting an excursion or exceedance, the source shall restore operation of the PSEU (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

B. Pursuant to 40 CFR 64.7(d)(2), determination of whether the source has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device.

**b. Monitoring - Monitoring**

Pursuant to 40 CFR 64.7(a), the source shall comply with the monitoring requirements of the CAM Plans as described in 7.6(e) below, pursuant to 40 CFR Part 64 as submitted in the source's CAM plan application.

**c. Monitoring - Recordkeeping**

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Pursuant to 40 CFR 64.9(b)(1), the source shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information related to the monitoring requirements established for CAM.

d. Monitoring - Reporting

Pursuant to Sections 39.5(7)(b) and (f) of the Act, the source shall submit the following reporting requirements:

i. Semiannual Reporting

As part of the required Semiannual Monitoring Reports, the source shall submit a CAM report including the following at a minimum:

- A. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(i).
- B. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(ii).

e. CAM Plans

The following tables contain the CAM Plans in this CAAPP permit:

| Table | Emission Unit Section | PSEU Designation | Pollutant                          |
|-------|-----------------------|------------------|------------------------------------|
| 7.6.1 | 4.2                   | Amine Plant      | SO <sub>2</sub> , H <sub>2</sub> S |

Table 7.6.1 - CAM Plan

|                        |                                    |
|------------------------|------------------------------------|
| Emission Unit Section: | 4.2                                |
| PSEU Designation:      | Amine-1                            |
| Pollutant:             | SO <sub>2</sub> , H <sub>2</sub> S |

| Indicators:   | #1)  | #2) |
|---|--|-----|
| <b>General Criteria</b>   |  |     |
| The Monitoring Approach Used to Measure the Indicators:                                       | Measuring total sulfur from Stretford flare.                               |     |
| The Indicator Range Which Provides a Reasonable Assurance of Compliance:                      | N/A  |     |
| Quality Improvement Plan (QIP) Threshold Levels:  | Weekly Calibration of monitors   |     |
| <b>Performance Criteria</b>   |  |     |
| The Specifications for Obtaining Representative Data:   | H <sub>2</sub> S analyzer/Total Sulfur monitor between Stretford and flare |     |
| Verification Procedures to Confirm the Operational Status of the Monitoring:                  | Weekly calibration of monitors   |     |
| Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data: | Weekly calibration of monitors   |     |
| The Monitoring Frequency:   | Once per hour  |     |
| The Data Collection Procedures That Will Be Used:   | Collect hourly measurements for 24-hour average                            |     |
| The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:    | Daily average  |     |

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## Section 8 - State Only Requirements

## 1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, 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. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

| <i>Pollutant</i>               |                    | <i>Tons/Year</i> |
|--------------------------------|--------------------|------------------|
| Volatile Organic Material      | (VOM)              | 307.3            |
| Sulfur Dioxide                 | (SO <sub>2</sub> ) | 451.5            |
| Particulate Matter             | (PM)               | 7.2              |
| Nitrogen Oxides                | (NO <sub>x</sub> ) | 529.67           |
| HAP, not included in VOM or PM | (HAP)              | 2.62             |
| Total                          |                    | 1,298.2          |

## Attachment 1 - List of Emission Units at This Source

| Section | Emission Units              | Description   |
|---------|-----------------------------|---|
| 4.1     | Natural Gas Fired Engines   | Engines that are used for natural gas compression and powering station generators. Each engine burns natural gas as a fuel.   |
| 4.2     | Amine Plants                | Hydrogen sulfide (H <sub>2</sub> S) and Carbon dioxide (CO <sub>2</sub> ) are removed from natural gas by a Sulfinol absorber unit. The H <sub>2</sub> S is then piped directly to the Stretford Sulfur Recovery Unit where sulfur solids are produced. Residual H <sub>2</sub> S is piped to the flare located in the Stretford Sulfur Recovery Unit.  |
| 4.3     | Glycol Dehydration Vents    | These dehydration units are used primarily to separate products and remove contaminants from the natural gas. A flare is used as a type of control device for the dehydration units.  |
| 4.4     | Steam Boilers and Reboilers | Natural gas fired boilers used to generate steam for heating.   |
| 4.5     | Amine Boilers               | Saturated amine (Methyl Diethcrolamine) is dehydrated in natural gas fired boilers. The Amine boilers are process heaters.  |
| 4.6     | Pipeline Heaters            | The pipeline heaters are primarily used to provide heat to the natural gas contained in a pipeline. The pipeline heaters are process heaters and burn natural gas as a fuel.  |
| 4.7     | Liquid Handling Equipment   | Natural gas from the storage field will enter the slugcatcher. The slugcatcher will be utilized to remove free liquid from the gas being withdrawn from the storage field. Gas discharging from the slugcatcher will be routed to existing separators and on to the main gas line. Liquid removed at the slugcatcher will be fed to a three-phase separator. Gas that may flash at the three-phase separator is routed to the fuel system. Water separated at the three-phase separator is fed to a 5,000-barrel (bbls) storage tank. There are no air emission point sources associated with the operation of the slug catcher or three-phase separator. |
| 4.8     | Truck Loading               | Loading racks and related equipment.  |

## Attachment 2 - Acronyms and Abbreviations

|                  |  |
|------------------|--|
| acfm             | Actual cubic feet per minute   |
| 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   |
| BACT             | Best Available Control Technology  |
| BAT              | Best Available Technology  |
| Btu              | British Thermal Units  |
| CAA              | Clean Air Act [42 U.S.C. Section 7401 et seq.]   |
| CAAPP            | Clean Air Act Permit Program   |
| CAIR             | Clean Air Interstate Rule  |
| CAM              | Compliance Assurance Monitoring  |
| CEMS             | Continuous Emission Monitoring System  |
| CFR              | Code of Federal Regulations  |
| CISWI            | Commercial Industrial Solid Waste Incinerator  |
| CO               | Carbon monoxide  |
| CO <sub>2</sub>  | Carbon dioxide   |
| COMS             | Continuous Opacity Monitoring System   |
| CPMS             | Continuous Parameter Monitoring System   |
| dscf             | Dry standard cubic foot  |
| dscm             | Dry standard cubic meter   |
| ERMS             | Emissions Reduction Market System  |
| °F               | Degrees Fahrenheit   |
| GHG              | Green house gas  |
| GACT             | Generally Acceptable Control Technology  |
| gr               | Grains   |
| HAP              | Hazardous air pollutant  |
| Hg               | Mercury  |
| HMIWI            | Hospital medical infectious waste incinerator  |
| hp               | Horsepower   |
| hr               | Hour   |
| H <sub>2</sub> S | Hydrogen sulfide   |
| I.D. No.         | Identification number of source, assigned by IEPA  |
| IAC              | Illinois Administrative Code   |
| ILCS             | Illinois Compiled Statutes   |
| IEPA             | Illinois Environmental Protection Agency   |
| kw               | Kilowatts  |
| LAER             | Lowest Achievable Emission Rate  |
| lbs              | Pound  |

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|                   |  |
|-------------------|--|
| m                 | Meter  |
| MACT              | Maximum Achievable Control Technology  |
| M                 | Thousand   |
| MM                | Million  |
| mos               | Month  |
| MSDS              | Material Safety Data Sheet   |
| MSSCAM            | Major Stationary Sources Construction and Modification (Non-attainment New Source Review)  |
| MW                | Megawatts  |
| NESHAP            | National Emission Standards for Hazardous Air Pollutants   |
| NO <sub>x</sub>   | Nitrogen oxides  |
| NSPS              | New Source Performance Standards   |
| NSR               | New Source Review  |
| PB                | Lead   |
| PEMS              | Predictive Emissions Monitoring System   |
| PM                | Particulate matter   |
| PM <sub>10</sub>  | Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods  |
| PM <sub>2.5</sub> | Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods |
| ppm               | Parts per million  |
| ppmv              | Parts per million by volume  |
| ppmw              | Parts per million by weight  |
| PSD               | Prevention of Significant Deterioration  |
| PSEU              | Pollutant-Specific Emission Unit   |
| psia              | Pounds per square inch absolute  |
| PTE               | Potential to emit  |
| RACT              | Reasonable Available Control Technology  |
| RMP               | Risk Management Plan   |
| scf               | Standard cubic feet  |
| SCR               | Selective catalytic reduction  |
| SIP               | State Implementation Plan  |
| SO <sub>2</sub>   | 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  |

## Attachment 3 - Contact and Reporting Addresses

|   |  |
|---|--|
| <p style="text-align: center;">IEPA<br/>Compliance Section</p> <p style="text-align: center;">IEPA<br/>Stack Test Specialist</p> <p style="text-align: center;">IEPA<br/>Air Quality Planning Section</p> <p style="text-align: center;">IEPA<br/>Air Regional Field Operations<br/>Regional Office #3</p> <p style="text-align: center;">IEPA<br/>Permit Section</p> | <p>Illinois EPA, Bureau of Air<br/>Compliance &amp; Enforcement Section (MC 40)<br/>1021 North Grand Avenue East<br/>P.O. Box 19276<br/>Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air<br/>Compliance Section<br/>Source Monitoring - Third Floor<br/>9511 Harrison Street<br/>Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air<br/>Air Quality Planning Section (MC 39)<br/>1021 North Grand Avenue East<br/>P.O. Box 19276<br/>Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air<br/>Regional Office #3<br/>2009 Mall Street<br/>Collinsville, Illinois 62234</p> <p>Phone No.: 618/346-5120</p> <p>Illinois EPA, Bureau of Air<br/>Permit Section (MC 11)<br/>1021 North Grand Avenue East<br/>P.O. Box 19506<br/>Springfield, Illinois 62794-9506</p> <p>Phone No.: 217/785-1705</p> |
| <p style="text-align: center;">USEPA<br/>Region 5 - Air Branch</p>  | <p>USEPA (AR - 17J)<br/>Air and Radiation Division<br/>77 West Jackson Boulevard<br/>Chicago, Illinois 60604</p> <p>Phone No.: 312/353-2000</p>  |

Attachment 4 - Example Certification by a Responsible Official

| <b>SIGNATURE BLOCK</b>   |                    |
|--|--------------------|
| <p>NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.</p>  |                    |
| <p>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. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))</p> |                    |
| <p>AUTHORIZED SIGNATURE:</p>   |                    |
| BY: _____  | _____              |
| AUTHORIZED SIGNATURE   | TITLE OF SIGNATORY |
| _____  | _____/_____/_____  |
| TYPED OR PRINTED NAME OF SIGNATORY   | DATE               |

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## PERMIT CALCULATION SHEET

|                      |                                      |                             |           |
|----------------------|--------------------------------------|-----------------------------|-----------|
| <b>Facility:</b>     | Natural Gas Pipeline Co. Station 206 |                             |           |
| <b>Analyst:</b>      | James O. Quinn                       | <b>ID Number:</b>           | 051808AAB |
| <b>Date:</b>         | October 15, 2017                     | <b>Permit Number:</b>       | 95120217  |
| <b>Contact Name:</b> | Charles Barker                       | <b>Type of Application:</b> | Renewal   |
| <b>Phone:</b>        | 303-914-7616                         |                             |           |
| <b>Email:</b>        | charles_barker@kindermorgan.com      |                             |           |

**1) Administratively Completeness Stage**

- a. Expiration Date from previous CAAPP Permit: March 14, 2007
- b. Date Renewal Application Due: June 14, 2006
- c. Date Renewal Application Received: June 6, 2006
- d. Administratively Complete: June 26, 2006

(See the Permit Record for Administrative Completeness Documentation)

**2) Technical Review Stage**

- a. Date Assigned: April 16, 2014
- b. Date Technical Review began: May 7, 2014
- c. Date Technical Review ended: 8/12/2014
- d. Results of Technical Review:
  - i. Request(s) for Additional Information during Technical Review Stage: No
  - ii. Application Certified Compliance: Yes
  - iii. Plans and Programs Reviewed during Technical Review Stage: Yes  
Plans/Programs Incorporated by Reference: Yes
  - iv. Emissions Testing Reviewed: Yes  
Stack Tests (See Permit Record for copies of Emissions Testing relied on and Statement of Basis for summary of results)
  - v. Emissions of Greenhouse Gases (GHG):  
As explained in the Statement of Basis, this source not a major source for emissions of GHG, with potential GHG emissions of less than 100 tpy (mass) and 100,000 tpy (CO2e). This source is also not subject to any applicable requirements for emissions of GHG. The Agency is also not collecting permit fees from CAAPP sources for GHG emissions.  
Actual GHG emissions less than 50% of 100,000 tpy of CO2e: Yes  
GHG PTE calculations relied on and determined: No
  - vi. Annual Certification(s) Reviewed: No
  - vii. Inspection Report(s) Reviewed: No
  - viii. Meeting(s) Held with Source: No
  - ix. Phone Conversation(s) that Resulted in Verbal Material Used: No
  - x. Site Visit(s): No

**3) Source Review of Preliminary DRAFT Permit(s)**

- a. Copy of Preliminary DRAFT Permit(s) in Permit Record: Yes
- Significant Source Comment(s) Received from Preliminary Draft: No



Supervisor Review Note(s):

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4) **Public Notice Stage**

- a. Copy of DRAFT Permit in Permit Record: Yes
- b. Copy of Statement of Basis in Permit Record: Yes
- c. Repository Documentation to Community Relations Officer: Provided
- d. Type of Public Notice Provided: Concurrent
- e. Start Date: 8/12/2014
- f. End Date: 9/11/2014
- g. Newspaper(s): St. Elmo Banner
- h. Hearing Held: No
- i. Comments Received:
  - i. Source: No
  - ii. US EPA: No
  - iii. Public: No

5) **Responsiveness Summary Written**

Supervisor Notes:

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6) **US EPA 45 Day Review Stage**

- a. Copy of Proposed Permit in Permit Record: Yes
  - b. Start Date: 8/12/2014
  - c. End Date: 9/26/2014
  - d. Petition for Objection Deadline Date: 11/26/2014
  - e. USEPA Objection: No
- If Yes, Complete Calculation Sheet #2 in addition to this Calculation Sheet.

7) **Preliminary Final Stage**

- a. Copy of Preliminary Final Permit in Permit Record: Yes
- b. Source Requested a Copy of Final Permit to be Issued: No
- c. Permit Engineer Recommendation:
  - i. Recommend Continuing with Final Issuance: Yes
  - ii. Recommend Place on Hold for 60 days before issuance: No
- d. Source Request Information:
  - i. Are any of the changes above being made to the permit? No

Further Discussions:



- 8) **Final Issuance Stage:**
- a. Copy of Final Permit in Permit Record Yes
  - b. Travelers Sheet Completed: Yes
  - c. ICEMAN Coding Completed: Yes
  - d. All 39.5 Issuance Requirments Met: Yes
  - e. Date of Issuance: 10/16/2014
  - f. Appeal Deadline Date: 11/29/2014
- (See the Permit Record for a Copy of the Final Permit and Responsiveness Summary where applicable)
- 9) **All Procedural Requirements Met:** Yes
- 10) **Additional Information Critical to Supporting the Permit Decision:** No
- 11) **Conclusion (Recommendation):** Grant

\_\_\_\_\_  
Permit Engineer Signature

  
Supervisor's Signature



**PERMIT REVIEW TRAVELER SHEET**

|                               |  |                               |
|-------------------------------|--|-------------------------------|
| <b>I.D. #</b> 051808AAB       | <b>Source Name</b> Natural Gas Pipeline Co | <b>Date Received</b> 6-6-2006 |
| <b>Application #</b> 95120217 | <b>Location</b> Saint Elmo                 | <b>Date Opened</b> 6-22-2006  |

|                        |                       |                             |
|------------------------|-----------------------|-----------------------------|
| <b>Program</b> TITLE V | <b>Type</b> OPERATING | <b>Title V Type</b> RENEWAL |
|------------------------|-----------------------|-----------------------------|

| Flag | Date | Section | Contact | Expiration Date |
|------|------|---------|---------|-----------------|
|      |      |         |         |                 |

| Emissions(Tons/Year)    | CO     | NOX    | PM   | SO2    | VOM    | Total HAP | Highest Single HAP |
|-------------------------|--------|--------|------|--------|--------|-----------|--------------------|
| Current Allowable Rates | 106.09 | 529.46 | 7.31 | 447.61 | 284.00 | .2184     | .22 - MECH         |
| Project/Total Increase  |        |        |      |        |        |           |                    |

| Initial Completeness                            | Analyst | Unit Manager | Date of Determination | Application Complete?                                    |
|---|---------|--------------|-----------------------|--|
| CAAPP Completeness <input type="checkbox"/> N/A |         |              |                       | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Fee Completeness <input type="checkbox"/> N/A   |         |              |                       | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Technical Completeness                          |         |              |                       | <input type="checkbox"/> Yes <input type="checkbox"/> No |

**Welcome Phone Call to Permit Applicant**

| Date | Contact Name | Telephone# | Was Additional Information Requested? |
|------|--------------|------------|---------------------------------------|
|      |              |            |                                       |

| For Incomplete Applications<br>Type of Letter Sent | Analyst                      | Unit Manager                | Date Issued   | Number of Items Requested<br>(or Amount of Fee Requested) |
|--|------------------------------|-----------------------------|---------------|---|
| Notice of Additional Fees:                         |                              |                             |               | \$  |
| Notice of Incompleteness(NOI)                      |                              |                             |               |   |
| Request for Additional Information(RAI)            |                              |                             |               |   |
| All Required Information Received?                 | <input type="checkbox"/> Yes | <input type="checkbox"/> No | Date Received |   |
| Notice of Intent to Deny CAAPP                     |                              |                             |               |   |

| Permit Processing  | Analyst        | Date        | Unit Manager        | Date        |
|--|----------------|-------------|---------------------|-------------|
| Draft Prepared for Unit Manager Review & Comments Returned to Analyst            |                |             |                     |             |
| Final Draft Sent to Applicant for Comments                                       |                |             |                     |             |
| Submitted to Word Processing   |                |             |                     |             |
| Draft Permit to Community Relations <input type="checkbox"/> N/A                 |                |             |                     |             |
| Public Comment Period Initiated  |                |             |                     |             |
| Public Hearing Date <input type="checkbox"/> N/A                                 |                |             |                     |             |
| Public Comment Period Completed <input type="checkbox"/> N/A                     |                |             |                     |             |
| 45 Day USEPA Comment Period <input type="checkbox"/> N/A                         |                |             |                     |             |
| USEPA Comments Received <input type="checkbox"/> Yes <input type="checkbox"/> No |                |             |                     |             |
| Responsiveness Summary Completed <input type="checkbox"/> N/A                    |                |             |                     |             |
| Public Participation Completed   |                |             |                     |             |
| <b>Final Action (Fill in One)</b>  | <b>Analyst</b> | <b>Date</b> | <b>Unit Manager</b> | <b>Date</b> |
| <input type="checkbox"/> Permit Not Required                                     |                |             |                     |             |
| <input type="checkbox"/> Grant   |                |             |                     |             |
| <input type="checkbox"/> Deny  |                |             |                     |             |

|                 |  |  |                                      |  |
|-----------------|--|--|--------------------------------------|--|
| <b>Mail-Out</b> | <input type="checkbox"/> District Office _____ | <input type="checkbox"/> Public Participation List | <input type="checkbox"/> Cook County | <input type="checkbox"/> Health Dept _____ |
|                 | <input type="checkbox"/> Enforcement _____     | <input type="checkbox"/> Other _____               | Init. _____                          | Date _____                                 |

| Permit Electronically Sent to | Applicant | CES | DLC | Community Relations | USEPA | AQPS | FOS |
|-------------------------------|-----------|-----|-----|---------------------|-------|------|-----|
| Person Sending (Initials)     |           |     |     |                     |       |      |     |

