

DRAFT/PROPOSED CAAPP PERMIT  
May 9, 2014

Attention:

BP Products North America, Inc. – Chicago Terminal  
Attn: Kristen Hancock  
4811 South Harlem Avenue  
Forest View, Illinois 60402

State of Illinois

CLEAN AIR ACT PERMIT  
PROGRAM (CAAPP) PERMIT

Source:

BP Products North America, Inc. – Chicago Terminal  
4811 South Harlem Avenue  
Forest View, Illinois 60402

I.D. No.: 031093AAH  
Permit No.: 95060058

Permitting Authority:

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

**CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT**

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

ID No.: 031093AAH  
Permit No.: 95060058  
Statement of Basis No.: 95060058-1403

Date Application Received: September 20, 2004  
Date Issued: TBD

Expiration Date: TBD  
Renewal Submittal Date: 9 Months Prior to TBD

Source Name: BP Products North America Inc.- Chicago Terminal  
Address: 4811 South Harlem Ave  
City: Forest View  
County: Cook  
ZIP Code: 60402

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 Rosario Johnstone at 217/785-1705.

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

ECB:AB:RJ:psj

cc: IEPA, Permit Section  
IEPA, FOS, Region 1  
Lotus Notes Database

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**Section 1 - Source Information**

**1. Addresses**

**Source**

BP Products North America, Inc  
 4811 South Harlem Avenue  
 Forest View, Illinois 60402

**Owner**

BP Products North America, Inc  
 150 West Warrenville Road  
 Naperville, Illinois 60563

**Operator**

BP Products North America, Inc.  
 4811 South Harlem Ave  
 Forest View, Illinois 60018

**Permittee**

The Owner and Operator of the source as identified in this table.

**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>	Alan Pyne	Terminal Manager
<i>Delegated Authority</i>	N/A	N/A

**Other Contacts**

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Kristen Hancock	708-749-5014	Kristen.hancock@bp.com
<i>Technical Contact</i>	Kristen Hancock	708-749-5014	Kristen.hancock@bp.com
<i>Correspondence</i>	Kristen Hancock	708-749-5014	Kristen.hancock@bp.com
<i>Billing</i>	Alan Pyne	708-749-5014	Alan.Pyne@bp.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

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.

- 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

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 **Error! Bookmark not defined.** (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.

- 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

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**

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.

## 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. Emissions Reduction Market System (ERMS)

Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS. The allotment of ATUs to this source is 348 ATUs per seasonal allotment period. The Permittee shall comply with all applicable requirements in Section 7.2 of this permit.

#### c. 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.

**d. 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 demolish pursuant to Condition 3.1(d)(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).

**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.

**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 01, 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).

<b>3. <u>Equipment Leaks (40 CFR 63 Subpart BBBBBB)</u></b>
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- a. Pursuant to 40 CFR 63.11089, the Permittee shall perform the following equipment leak inspections of all equipment (each valve, pump, pressure relief device, sampling connection system, open-ended valve or line, and flange or other connector in the gasoline liquid and vapor collection systems as defined in 40 CFR 63.11100):
  - i. The Permittee shall perform a monthly leak inspection of all equipment in gasoline service, as defined above and in 40 CFR 63.11100. For this inspection, detection methods incorporating sight, sound, and smell are acceptable.
  - ii. A log book shall be used and shall be signed by the Permittee at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility.

- iii. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided below.
  - iv. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report the reason(s) why the repair was not feasible and the date each repair was completed.
- b. Pursuant to 40 CFR 63.11094(d), the Permittee subject to the equipment leak provisions of 40 CFR 63.11089 shall prepare and maintain a record describing the types, identification numbers, and locations to all equipment in gasoline service. If instrument program under 40 CFR 11089 is implemented, the record shall contain a full description of the program.
- c. Pursuant to 40 CFR 63.11094(e), the Permittee subject to the equipment leak inspections under 40 CFR 63.11089 shall record in the log book for each leak that is detected the following information:
- i. The equipment type and identification number.
  - ii. The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell).
  - iii. The date the leak was detected and the date of each attempt to repair the leak.
  - iv. Repair methods applied in each attempt to repair the leak.
  - v. "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak.
  - vi. The expected date of successful repair of the leak if the leak is not repaired within 15 days.
  - vii. The date of successful repair of the leak.

**4. Pump and Compressor Requirements (35 IAC 218.142)**

- a. Pursuant to 35 IAC 218.142, the Permittee shall not cause or allow the discharge of more than 32.8 ml (2 cu in) of VOL with vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions.
- b. Pursuant to Section 39.5(7)(a) of the Act, compliance with the standard in 35 IAC 218.142 shall be achieved through implementation of the following procedures:
  - i. Inspections and repairs of the liquid leaks, as identified in 40 CFR 63.11089 and described in Condition 3.3 above.
  - ii. If a liquid leak(s) of VOL was discovered and identified, the Permittee shall use all available means to start localizing or collecting a leak and shall assess the amount of VOL being discharged on the hourly basis before a leak is repaired.
  - iii. If the measured VOL leak exceeds the amount identified in 35 IAC 218.142, the Permittee shall report this event in accordance with Condition 3.7(a).
- c. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep records documenting whether the discharge of VOL emissions was in compliance with the applicable limitation in Condition 3.4(a) above.

**5. 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.

**6. 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.

**7. 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:
  - I. Requirements in Conditions 3.1(a) and 3.1(b).
  - II. Requirements in Conditions 3.3 and 3.4.
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.7(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 3.7(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 3.7(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).

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**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.

**b. Federal Reporting for Equipment Leaks (40 CFR 63 Subpart BBBBBB)**

Pursuant to 40 CFR 63.11089, the Permittee shall provide to the Illinois EPA, the semiannual compliance report specified in 40 CFR 63.11089 and 40 CFR 63.11095(b) for equipment leak inspections and shall include the number of equipment leaks not repaired within 15 days after detection. The semiannual compliance report could be submitted together with a Semiannual Monitoring Report on the dates identified above.

## Section 4 - Emission Unit Requirements

### 4.1 Existing Internal Floating Roof Storage Tanks in Gasoline Service

#### 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>
175,569 Gallons Gasoline Internal Floating Roof (Tank #15)	VOM, HAP	1946	N/A	Internal floating roof, mechanical shoe primary seal, and a permanent submerged loading pipe.	None
744,600 Gallons Gasoline Internal Floating Roof (Tank #25)	VOM, HAP	1949	N/A	Internal floating roof, mechanical shoe primary seal, and a permanent submerged loading pipe.	None
739,602 Gallons Gasoline Internal Floating Roof (Tank #26)	VOM, HAP	1949	N/A	Internal floating roof, mechanical shoe primary seal, and a permanent submerged loading pipe.	None
2,132,298 Gallons Gasoline Internal Floating Roof (Tank #53)	VOM, HAP	1949	N/A	Internal floating roof, mechanical shoe primary seal, and a permanent submerged loading pipe.	None
2,084,334 Gallons Gasoline Internal Floating Roof (Tank #57)	VOM, HAP	1951	N/A	Internal floating roof, mechanical shoe primary seal, and a permanent submerged loading pipe.	None
3,061,508 Gallons Gasoline Internal Floating Roof (Tank #58)	VOM, HAP	1955	N/A	Internal floating roof, vapor mounted primary seal, rim mounted secondary seal, and a permanent submerged loading pipe. Geodesic domed roof	None
3,080,091 Gallons Gasoline Internal Floating Roof (Tank #59)	VOM, HAP	1956	N/A	Internal floating roof, vapor mounted primary seal, rim mounted secondary seal, and a permanent submerged loading pipe. Geodesic domed roof	None

Note: For the emission units in Condition 4.1.1 above, the applicable requirements in non-gasoline mode of operation are addressed in Permit Section 4.2.

#### 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. i. Work Practices and Control Requirements

##### A. Requirements of 35 IAC Part 218 Subpart B:

- I. Pursuant to 35 IAC 218.120(a), each tank shall be equipped with an internal floating roof that meets the specifications contained in 35 IAC 218.120(a)(1)(A) through (H).
- II. Pursuant to 35 IAC 218.121(b)(1), each tank shall be equipped with a floating roof which rests on the surface of the volatile petroleum liquid (VPL) and is equipped with a closure seal or seals between the roof edge and the tank wall. VPL stored in each floating roof tank shall not have a vapor pressure of 86.19 kPa (12.5 psia) or greater at

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**4.1 Existing Internal Floating Roof Storage Tanks in Gasoline Service**

294.3°K (70°F). The Permittee shall not cause or allow the emission of VOMs into the atmosphere from any gauging or sampling devices attached to each tank, except during sampling or maintenance operations.

- III. Pursuant to 35 IAC 218.122(b), each tank shall be equipped with a permanent submerged loading pipe.
- IV. Pursuant to 35 IAC 218.123(b), no volatile petroleum liquid is allowed to be stored in the tanks, unless each tank is equipped and operated as follows:
  - 1. The tank is equipped with an internal floating roof as specified in 35 IAC 218.121(b);
  - 2. There are no visible holes, tears or other defects in the seal or any seal fabric or material of any floating roof;
  - 3. All openings of any floating roof deck, except stub drains, are equipped with covers, lids or seals such that:
    - i. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank;
    - ii. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and
    - iii. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

**B. Requirements of 40 CFR 63 Subpart BBBBBB:**

- I. Pursuant to 40 CFR 63.11081(a), the tanks are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart BBBBBB for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.
  - 1. Pursuant to 40 CFR 63.11098, the Permittee shall meet the applicable general provisions of 40 CFR 63 Subpart A.
  - 2. Pursuant to 40 CFR 63.11085(a), the Permittee shall, at all times, operate and maintain each storage tank, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.
- II. Pursuant to 40 CFR 63.11087(a) and Table 1 of 40 CFR 63 Subpart BBBBBB, the Permittee shall:
  - 1. Equip and operate each internal floating roof of a gasoline storage tank according to the applicable requirements in 40 CFR 63.1063(a)(1) of design requirements for rim seals and 40 CFR 63.1063(b) for floating roof operational requirements, except for the secondary seal requirements under 40 CFR 63.1063(a)(1)(i)(C) and (D). [Option 2d in Table 1]

**Section 4 - Emission Unit Requirements**  
**4.1 Existing Internal Floating Roof Storage Tanks in Gasoline Service**

ii. Compliance Method (Work Practice and Control Requirements)

Monitoring

- A. Pursuant to 40 CFR 63.11087(c) and 40 CFR 63.11092(e)(1), the Permittee shall perform the following visual inspections of the different internal floating roof system designs according to the requirements of 40 CFR 63.1063(c)(1), based on complying with Option 2(d) in Table 1 of 40 CFR 63 Subpart BBBBBB:
- I. 40 CFR 63.1063(c)(1)(i)(A):
- The internal floating roofs shall be inspected through the roof hatch as specified in 40 CFR 63.1063(d)(2) at least once per year.
- II. 40 CFR 63.1063(c)(1)(i)(B):
- The internal floating roofs shall be inspected as specified in 40 CFR 63.1063(d)(1) each time the tank is completely emptied and degassed, or every 10 years, whichever occurs first. The inspection may be performed entirely from the top side of the floating roof (i.e., while the tank is still in service), as long as there is visual access to all deck components specified in 63.1063(a).
- B. 35 IAC 218.123(b):
- I. Pursuant to 35 IAC 218.123(b)(4), the Permittee shall conduct routine inspections of floating roof seals through roof hatches once every six months.
- II. Pursuant to 35 IAC 218.123(b)(5), a complete inspection of the cover and seal of any floating roof tank is made whenever the tank is emptied for reasons other than the transfer of petroleum liquid during the normal operation of the tank, or whenever repairs are made as a result of any semi-annual inspection or incidence of roof damage or defect.

Recordkeeping

- C. Pursuant to 40 CFR 63.11094(a), the Permittee shall keep the following records as specified in 40 CFR 63.1065 if the storage tanks are complying with Option 2(d) in Table 1 of 40 CFR 63 Subpart BBBBBB as identified above:
- I. Tank dimensions and capacity.
- II. Inspection results with the following data:
1. Identification of the storage tank that was inspected;
  2. The date of inspection;
  3. A description of all inspection failures;
  4. A description of all repairs and the dates they were made;
  5. The date the storage vessel was removed from service, if applicable.
- D. Pursuant to 35 IAC 218.123(b)(6), the Permittee shall keep the records of each inspection conducted under 35 IAC 218.123(b)(4) and (b)(5).

**Section 4 - Emission Unit Requirements**  
**4.1 Existing Internal Floating Roof Storage Tanks in Gasoline Service**

- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the presence of the submerged loading pipe.

**3. Non-Applicability Determinations**

- a. The tanks are not subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels), 40 CFR Part 60 Subpart K, K<sub>a</sub>, K<sub>b</sub>, because the tanks were not constructed, reconstructed, or modified after July 23, 1984. Note: the tanks are subject to certain requirements of 40 CFR Part 60 Subpart K<sub>b</sub> when 40 CFR Part 63 Subpart BBBBBB contains an optional compliance reference to the certain provisions of Subpart K<sub>b</sub> or 40 CFR Subpart WW. The Permittee is using 40 CFR Subpart WW option.
- b. The tanks are not subject to the National Emission Standards for Hazardous Air Pollutants for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), 40 CFR Part 63 Subpart R, because the tanks are not located at a source that is a major source of hazardous air pollutants.
- c. The tanks are not subject to 35 IAC 218.120(a)(4) requiring installation of a vapor control system, because each tank is equipped with internal floating roof.
- d. The gasoline storage tank is not subject to 35 IAC 218.301 because the gasoline storage tank does not use organic material as defined in 35 IAC 211.4250(b).
- e. The tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the tanks use passive control measures, such as seals, lids, or roofs, that are not considered control devices.

**4. Operational Flexibility/Anticipated Operating Scenarios**

For other types of petroleum or organic liquid stored in these tanks, see permit section 4.2

**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).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.7(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.7(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.

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**4.1 Existing Internal Floating Roof Storage Tanks in Gasoline Service**

- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

**b. Federal Reporting**

- i. Pursuant to 40 CFR 63.11087, the Permittee must keep records and submit reports as specified in 40 CFR 63.11094 and 40 CFR 63.11095(a)(2) and (a) the Permittee shall include in a semiannual compliance report the following information:
  - A. For storage tanks complying with option 2(d) in Table 1 of 40 CFR 63 Subpart BBBBBB, the information specified in 40 CFR 63.1066.
- ii. Pursuant to 40 CFR 63.11085(b), 40 CFR 63.11087(e), 40 CFR 63.11089(g), and 40 CFR 63.11095(d), the Permittee shall submit a semiannual report including the number, duration, and a brief description of 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 shall also include a description of actions taken by the Permittee during a malfunction of the source to minimize emissions in accordance with 40 CFR 63.11085(a), including actions taken to correct a malfunction. The report may be submitted as a part of the semiannual compliance report required by Condition 3.7(b).

**4.2 Existing Internal Floating Roof Storage Tanks in Non-Gasoline Service**

**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>
744,600 Gallons Gasoline Internal Floating Roof (Tank #25)	VOM, HAP	1949	N/A	Internal floating roof, mechanical shoe primary seal, and a permanent submerged loading pipe.	None
739,602 Gallons Gasoline Internal Floating Roof (Tank #26)	VOM, HAP	1949	N/A	Internal floating roof, mechanical shoe primary seal, and a permanent submerged loading pipe.	None
2,132,298 Gallons Gasoline Internal Floating Roof (Tank #53)	VOM, HAP	1949	N/A	Internal floating roof, mechanical shoe primary seal, and a permanent submerged loading pipe.	None
2,084,334 Gallons Gasoline Internal Floating Roof (Tank #57)	VOM, HAP	1951	N/A	Internal floating roof, mechanical shoe primary seal, and a permanent submerged loading pipe.	None
3,061,508 Gallons Gasoline Internal Floating Roof (Tank #58)	VOM, HAP	1955	N/A	Internal floating roof, vapor mounted primary seal, rim mounted secondary seal, and a permanent submerged loading pipe. Geodesic domed roof	None
3,080,091 Gallons Gasoline Internal Floating Roof (Tank #59)	VOM, HAP	1956	N/A	Internal floating roof, vapor mounted primary seal, rim mounted secondary seal, and a permanent submerged loading pipe. Geodesic domed roof	None

Note: For the emission units in Condition 4.2.1 above, the applicable requirements in gasoline mode of operation are addressed in Permit Section 4.1.

**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. i. Work Practices and Control Requirements**

A. Requirements of 35 IAC Part 218 Subpart B:

- I. Pursuant to 35 IAC 218.120(a), each VOL tank shall be equipped with an internal floating roof that meets the specifications contained in 35 IAC 218.120(a)(1)(A) through (H).
- II. Pursuant to 35 IAC 218.121(b)(1), each VPL tank shall be equipped with a floating roof which rests on the surface of the volatile petroleum liquid (VPL) and is equipped with a closure seal or seals between the roof edge and the tank wall. VPL stored in each floating roof tank shall not have a vapor pressure of 86.19 kPa (12.5 psia) or greater at 294.3°K (70°F). The Permittee shall not cause or allow the emission of VOMs into the atmosphere from any gauging or sampling devices attached to each tank, except during sampling or maintenance operations.

III. Pursuant to 35 IAC 218.122(b), each tank shall be equipped with a permanent submerged loading pipe.

ii. Compliance Method (Work Practices and Control Requirements)

Monitoring

A. 35 IAC 218.123(b):

I. Pursuant to 35 IAC 218.123(b)(4), the Permittee shall conduct routine inspections of the VPL storage tank floating roof seals conducted through roof hatches once every six months.

II. Pursuant to 35 IAC 218.123(b)(5), a complete inspection of the cover and seal of any floating roof tank is made whenever the VPL tank is emptied for reasons other than the transfer of petroleum liquid during the normal operation of the tank, or whenever repairs are made as a result of any semi-annual inspection or incidence of roof damage or defect.

III. Pursuant to 35 IAC 218.127(a)(2), the Permittee shall conduct the routine inspections of the floating roof seals conducted through roof hatches once every 12 months and comply with the requirements specified in 35 IAC 218.127(a)(2) through (4).

Recordkeeping

B. Pursuant to Section 39.5(7)(b), the Permittee shall keep the following records:

I. Tank dimensions and capacity.

II. Inspection results with the following data:

1. Identification of the storage tank that was inspected;
2. The date of inspection;
3. A description of all inspection failures;
4. A description of all repairs and the dates they were made;
5. The date the storage vessel was removed from service, if applicable.

C. Pursuant to 35 IAC 218.123(b)(6), the Permittee shall keep the records of each inspection conducted under 35 IAC 218.123(b)(4) and (b)(5).

D. Pursuant to 35 IAC 218.129(a)(2), the Permittee shall keep records of each VOL tank inspection conducted under 35 IAC 218.127(a)(2), (a)(3) and (a)(4).

E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the presence of the submerged loading pipe.

**3. Non-Applicability Determinations**

- a. The tanks are not subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels), 40 CFR Part 60 Subpart K, Ka, Kb, because the tanks were not constructed, reconstructed, or modified after July 23, 1984.

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- b. The tanks are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities, 40 CFR Part 63 Subpart BBBBBB, because the tanks do not store gasoline pursuant to 40 CFR 63.11082. For gasoline storage operations see Permit Section 4.1.
- c. The gasoline storage tank are not subject to 35 IAC 218.301 because the gasoline storage tanks do not use organic material as defined in 35 IAC 211.4250(b).
- d. The tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the tanks use passive control measures, such as seals, lids, or roofs, that are not considered control devices.

**4. Operational Flexibility/Anticipated Operating Scenarios**

For gasoline stored in these tanks, see permit section 4.1.

**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 Condition 4.2.2(a)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.7(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.7(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.

**4.3 Existing Internal Floating Roof Storage Tanks for Ethanol**

**1. Emission Units and Operations**

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
416,178 Gallons Ethanol Internal Floating Roof (Tank #7)	VOM	Prior to 1960	None	Internal floating roof, liquid mounted resilient primary seal, and a permanent submerged loading pipe.	None
404,000 Gallons Ethanol Internal Floating Roof (Tank #8)	VOM	Prior to 1960	None	Internal floating roof, liquid mounted resilient primary seal, and a permanent submerged loading pipe.	None
824,000 Gallons Ethanol Internal Floating Roof (Tank #21)	VOM	Prior to 1960	None	Internal floating roof, liquid mounted resilient primary seal, and a permanent submerged loading pipe.	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. i. Volatile Organic Material Requirements (VOM)**

A. Pursuant to Construction Permits #94080003 and #95100032 and Section 39.5(7)(a) of the Act, VOM emissions from each tank shall not exceed 0.13 (lb/hr) and 0.57 tons/year. The tanks are limited to the storage of denatured ethanol only. [T1]

**ii. Compliance Method (VOM Requirements)**

Monitoring

A. Pursuant to Construction Permits #94080003, #95100032 and Section 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 Section 39.5(7)(b) of the Act, the Permittee shall maintain records as follows:

- I. Materials stored in each tank.
- II. VOM emissions from each tank with supporting documentation (tons/year).

**b. i. Work Practices and Control Requirements**

**B. Requirements of 35 IAC Part 218 Subpart B:**

- I. Pursuant to 35 IAC 218.120(a), each tank VOL shall be equipped with internal floating roof that meets the specifications contained in 35 IAC 218.120(a)(1)(A) through (H)

**Section 4 - Emission Unit Requirements**  
**4.3 - Existing Internal Floating Roof Storage Tanks for Ethanol**

II. Pursuant to 35 IAC 218.122(b), each tank shall be equipped with a permanent submerged loading pipe.

ii. Compliance Method (Work Practices and Control Requirements)

Monitoring

A. Pursuant to 35 IAC 218.127(a)(1), the Permittee shall conduct the routine inspections of the floating roof seals conducted through roof hatches once every 12 months and comply with the requirements specified in 35 IAC 218.127(a)(1) through (5).

Recordkeeping

B. Pursuant to 35 IAC 218.129, the Permittee shall keep records of each inspection conducted under 35 IAC 218.127(a)(1) through (a)(5). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

c. i. Operational and Production Requirements

A. Pursuant to Construction Permits #94080003 and #95100032, total throughput of Tanks 7, 8 and 21 shall not exceed 17,427,665 gallons/month and 174,276,646 gallons/year, respectively. [T1]

ii. Compliance Method (Operational and Production Requirements)

Monitoring

A. Pursuant to Section 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 Section 39.5(7)(b) of the Act, the Permittee shall keep records of annual individual throughput of Tanks #7, #8 and #21.

D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records and dates of any activity that resulted in a modification or reconstruction of any tank.

**3. Non-Applicability Determinations**

- a. The tanks are not subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels), 40 CFR Part 60 Subpart K, K<sub>a</sub>, K<sub>b</sub> because the tanks were not constructed, reconstructed, or modified prior to July 23, 1984.
- b. The tanks are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities, 40 CFR Part 63 Subpart BBBB, because the tanks do not store gasoline pursuant to 40 CFR 63.11082.
- c. The gasoline storage tank are not subject to 35 IAC 218.301 because the gasoline storage tanks do not use organic material as defined in 35 IAC 211.4250(b).

- d. The tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the tanks use passive control measures, such as seals, lids, or roofs, that are not considered control devices.

#### **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 Condition 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 3.7(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.7(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. State Reporting**

- i. A. Pursuant to 35 IAC 218.127(a)(5), the Permittee shall promptly notify the IEPA, Air Compliance Section, in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 35 IAC 218.127(a)(1) and (a)(4) to afford the IEPA the opportunity to have an observer present. If the inspection required by subsection 35 IAC 218.127(a)(4) is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Permittee shall notify the Agency at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the IEPA at least 7 days prior to the refilling.
- B. Pursuant to 35 IAC 218.129(a)(3), and (a)(4), the Permittee shall promptly notify the IEPA, Air Compliance Section, in writing if any of the conditions described in 35 IAC 218.127(a)(2) are detected during the annual visual

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inspection required by Section 218.127(a)(2), report to the IEPA within 30 days after the inspection the identity of the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made; and

- C. after each inspection required by 35 IAC 218.127(a)(3) where holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 35 IAC 218.127(a)(3)(B) are discovered, report to the IEPA within 30 days after the inspection the identity of the storage vessel and the reason it did not meet the specifications of 35 IAC 218.120(a)(1) or (2) or 35 IAC 218.127(a), and list each repair made.

4.4 Gasoline Truck Loading Racks

**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>
Tank Truck Loading/ Unloading Rack Five Bay Loading Rack	VOM, HAP	1989	N/A	Vapor Recovery Unit (VRU, carbon adsorbtion, primary control) and Vapor Combustion Unit (VCU, enclosed flare oxidation, back-up control)	CEMS (for VRU) Presence of pilot flame (for VCU)

**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. i. Volatile Organic Material Requirements (VOM)**

- A. Pursuant to 40 CFR 63.11088(a) and Table 2 of Subpart BBBBBB, the Permittee shall reduce emissions of total organic compounds (TOC) to less than or equal to 80 mg/l of gasoline loaded into gasoline cargo tanks at the loading rack.
- B. Pursuant to 40 CFR 60.502(b), the emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded, except as noted in 40 CFR 60.502(c).
- C. Pursuant to 35 IAC 218.582(a)(1), no person shall cause or allow the transfer of gasoline into any delivery vessel from any bulk gasoline terminal unless the bulk gasoline terminal is equipped with a vapor control system that limits emission of VOM to 80 mg/l (0.00067 lbs/gal) of gasoline loaded.
- D. Pursuant to Construction Permit #13050006, VOM emission from the VCU shall not exceed 19.7 mg/liter of gasoline loaded. [T1]
- E. Pursuant to Construction Permit #13050006, total VOM emission from the VCU and associated loading rack shall not exceed 32.1 tons/year. [T1]
- F. Pursuant to Section 39.5(7) (a) of the Act, total VOM emission from the VRU associated with gasoline loading operations shall not exceed 22.5 tons/month and 90.1 tons/year. [T1]

**ii. Compliance Method (VOM Requirements)**

Monitoring

- A. Pursuant to Section 39.5(7) (b), 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).
- B. Pursuant to 40 CFR 63.11092(b)(1)(i)(A), a continuous monitoring system (CEMS) capable of measuring organic compound concentration shall be installed in the exhaust air stream from a carbon adsorption system (VRU).

**Section 4 - Emission Unit Requirements**  
**4.4 - Gasoline Truck Loading Racks**

- C. See also Condition 4.3.2( f)(i) for the inspection requirements.
- D. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the loading racks are subject to 40 CFR Part 64 when VCU is in operation. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.5 and Table 7.5.1, 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).
- E. Pursuant to 40 CFR 63.8( c)(4), the CEM shall be in continuous operation and shall meet minimum frequency of operation requirements and shall complete a minimum of one cycle of operation for each successive 15-minute period. The Permittee shall comply with all the applicable general requirements in 40 CFR 63.8.

Testing

- F. Pursuant to Section 39.5(7)(c), the Permittee may use a portable VCU unit as a backup for the primary VRU. The portable VCU unit is subject to all control requirements applicable to the VCU as described in Section 4.4. If the portable VCU operates more than 30 days per year (12 months rolling), the Permittee shall inform the IEPA's Compliance Section and Regional Field Operations office within 3 business days and conduct a test on the portable VCU unit within 60 days of such notification by using methods 2A, 2B, 25B, and 21. Any further exceedances of a 30-day VCU operation during 12-month period after initial test shall not trigger new testing action. The Permittee shall comply with all the applicable testing requirements of Section 7.1.
- G. Pursuant to 40 CFR 63.11092(f), the annual certification test for gasoline cargo tanks shall be performed in accordance with requirements of 40 CFR 63.11092(f)(1) and (f)(2).

Recordkeeping

- H. 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/yr) for each mode of operation (with VCU or VRU).
- I. Pursuant to 40 CFR 63.11094(b), the Permittee shall keep records of the test results for each gasoline cargo tank loading at the facility as specified in 40 CFR 63.11094(b)(1) through (3).

**b. i. Carbon Monoxide Requirements (CO)**

- A. Pursuant to Construction Permit #13050006, emissions from the VCU shall not exceed the following limit: [T1]

<u>Pollutant</u>	<u>(Tons/Yr)</u>
CO	13.6

ii. Compliance Method (CO Requirements)

**Monitoring**

A. Pursuant to Construction Permit #13050006, 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 total 12 months of data).

**Recordkeeping**

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of CO emissions from the VCU with supporting calculations (ton/year).

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

A. Pursuant to Construction Permit #13050006, NO<sub>x</sub> emissions from the VCU shall not exceed the following limit: [T1]

<u>Pollutant</u>	<u>(Tons/Yr)</u>
NO <sub>x</sub>	2.5

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

**Monitoring**

A. Pursuant to Construction Permit #13050006, 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 total of 12 months of data).

**Recordkeeping**

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the NO<sub>x</sub>, emissions from the VCU including supporting calculations (ton/year).

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

A. Pursuant to Construction Permit #13050006, SO<sub>2</sub> emissions from the VCU shall not exceed the following limit: [T1]

<u>Pollutant</u>	<u>(Tons/Yr)</u>
SO <sub>2</sub>	0.44

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

**Monitoring**

A. Pursuant to Construction Permit #13050006, 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 total of 12 months of data).

**Recordkeeping**

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the SO<sub>2</sub> emissions from the VCU including supporting calculations (ton/year).

**e. i. Green House Gas GHG (as CO<sub>2</sub>e)**

A. Pursuant to Construction Permit #13050006, GHG emissions from the VCU shall not exceed the following limits: [T1]

<u>Pollutant</u>	<u>(Tons/Yr)</u>
GHG	6,000

ii. Compliance Method (GHG Requirements)

**Monitoring**

A. Pursuant to Construction Permit #13050006, 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 total of 12 months of data).

**Recordkeeping**

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the GHG as CO<sub>2</sub>e emissions from the VCU including supporting calculations (ton/year).

**f. i. Work Practice and Control Requirements -40 CFR 63 Subpart BBBBBB: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities**

A. Pursuant to 40 CFR 63.11088(a) and Table 2 of Subpart BBBBBB, the Permittee shall comply with the following requirements:

1. A gasoline loading rack(s) at a bulk gasoline terminal with a gasoline throughput of 250,000 gallons per day, or greater	(a) Equip your loading rack(s) with a vapor collection system designed to collect the TOC vapors displaced from cargo tanks during product loading; and
	(b) Reduce emissions of TOC to less than or equal to 80 mg/l of gasoline loaded into gasoline cargo tanks at the loading rack; and
	(c) Design and operate the vapor collection system to prevent any TOC vapors collected at one loading rack from passing to another loading rack; and
	(d) Limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in 40 CFR 60.502(e) through (j).

ii. Compliance Method (Work Practice Requirements)

**Monitoring**

A. Pursuant to 40 CFR 63.11092(b)(1)(iii)(B)(1), for the VCU, the Permittee shall monitor the presence of a thermal oxidation system pilot flame by using a heat-sensing device, such as an ultraviolet beam sensor or a

thermocouple, installed in proximity of the pilot light, to indicate the presence of a flame. The heat-sensing device shall send a positive parameter value to indicate that the pilot flame is on, or a negative parameter value to indicate that the pilot flame is off.

- B. Pursuant to 40 CFR 63.11092(b)(1)(iii)(B)(2), the Permittee shall operate the VRU and VCU in accordance with the Monitoring and Inspection Plans (prepared by the source on November 2010 and May 2013), including performing of the following inspections:
  - I. Semi-annual preventive maintenance inspections of the thermal oxidation system, including the automated alarm or shutdown system for those units so equipped, according to the recommendations of the manufacturer of the system.
  - II. Daily inspections of the loading rack, the proper operation of the assist-air blower and the vapor line valve.

Recordkeeping

- C. Pursuant to 40 CFR 63.11094(f), the Permittee shall keep the records as specified on to 40 CFR 63.11094(f)(1) through (f)(5).
- D. Pursuant to 40 CFR 63.11094(g), shall keep the following records:
  - I. Records of the occurrence and duration of each malfunction of operation of the loading racks or VRU or VCU and monitoring equipment.
  - II. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.11085(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

g. i. **Work Practice and Control Requirements -40 CFR 60 Subpart XX Standards of Performance for Bulk Gasoline Terminals**

- A. Pursuant to 40 CFR 60.502(d), each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.
- B. Pursuant to 40 CFR 60.502(e), loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the procedures 40 CFR 60.502(e)(1) through (e)(6).
- C. Pursuant to 40 CFR 60.502(f), the Permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.
- D. Pursuant to 40 CFR 60.502(g), the Permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck.
- E. Pursuant to 40 CFR 60.502(h), the vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).

- F. Pursuant to 40 CFR 60.502(i), no pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

ii. Compliance Method (Work Practice Requirements)

Testing

- A. Pursuant to 40 CFR 60.503(a), the Permittee shall conduct performance tests required in 40 CFR 60.8, by utilizing test methods and procedures in Appendix A or other methods and procedures as specified in 40 CFR 60.8, except as provided in 40 CFR 60.8(b). The three-run requirement of 40 CFR 60.8(f) does not apply.
- B. Pursuant to 40 CFR 60.503(b), immediately prior to the performance test required to determine compliance with 40 CFR 60.502(b), (c), and (h), the Permittee shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The Permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.
- C. Pursuant to 40 CFR 60.503(c), the Permittee shall determine compliance with the standards in 40 CFR 60.502(b) and (c) as specified in 40 CFR 60.503(c)(1) through (c)(7).
- D. Pursuant to 40 CFR 60.503(d), the Permittee shall determine compliance with the standard in 40 CFR 60.502(h) as specified in 40 CFR 60.503(d)(1) through (d)(2).
- E. The Permittee shall comply with all the applicable testing requirements of Section 7.1.
- F. For the frequencies of testing requirements in Condition 4.4.2(d)(ii)(A), (B), and (C), see testing requirements of Condition 4.4.2(a)(ii).

Monitoring

- G. Pursuant to 40 CFR 60.502(j), each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

Recordkeeping

- H. For tank truck(s), the Permittee shall keep records specified in 40 CFR 60.505(a), (b) and (e).

**h. Work Practice and Control Requirements - 35 IAC 218.582**

- A. Pursuant to 35 IAC 218.582(a)(2), the vapor control system is operating and all vapors displaced in the loading of gasoline to the delivery vessel are vented only to the vapor control system.
- B. Pursuant to 35 IAC 218.582(a)(3), there shall be no liquid drainage from the loading device of a loading rack when it is not in use.

**Section 4 - Emission Unit Requirements**  
**4.4 - Gasoline Truck Loading Racks**

- C. Pursuant to 35 IAC 218.582(a)(4), all loading and vapor return lines shall be equipped with fittings which are vapor tight.
- D. Pursuant to 35 IAC 218.582(a)(5), the delivery vessel displays the appropriate sticker pursuant to the requirements of 35 IAC 218.584(b) or (d); or, if the terminal is driver-loaded, the terminal owner or operator shall be deemed to be in compliance with this 35 IAC 218.582 when terminal access authorization is limited to those owners and/or operators of delivery vessels who have provided a current certification as required by 35 IAC 218.584(c)(3).
- E. Pursuant to 35 IAC 218.582(b)(2), 218.582(b)(1)(A) and (C), the Permittee shall provide a pressure tap or equivalent on the vapor collection system associated with an affected loading rack. The vapor collection system and the gasoline loading equipment shall be operated in such a manner that it prevents avoidable leaks of liquid during loading or unloading operations and prevents the gauge pressure from exceeding 18 inches of water and the vacuum from exceeding 6 inches of water and to be measured as close as possible to the vapor hose connection.

ii. Compliance Method (Work Practice and Control Requirements)

Monitoring

- A. Pursuant to 35 IAC 218.582(a), no person shall cause or allow the transfer of gasoline into a delivery vessel from an affected loading rack unless the delivery vessel displays the appropriate sticker pursuant to 35 IAC 218.584(b) or (d) or the delivery vessel has provided a current certification as required by 35 IAC 218.584(c)(3), and the delivery vessel meets the following requirements: [35 IAC 218.582(a)(5) and 218.584(a)]
  - I. Includes a vapor space connection that is equipped with fitting(s) which are vapor tight;
  - II. Has its hatches closed at all times during loading or unloading operations, unless a top loading vapor recovery system is used;
  - III. Does not internally exceed a gauge pressure of 18 inches of water or a vacuum of 6 inches of water;
  - IV. Is designed and maintained to be vapor tight at all times during normal operations;
  - V. Is not refilled in Illinois at other than:
    - 1. Bulk gasoline terminals that comply with the requirements of 35 IAC 218.582; or
    - 2. Bulk gasoline plants that comply with the requirements of 35 IAC 218.581(b); and
  - VI. Are tested annually in accordance with Method 27, 40 CFR 60, Appendix A. Each vessel must be repaired and retested within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, when it fails to sustain:
    - 1. A pressure drop of no more than three inches of water in five minutes; and
    - 2. A vacuum drop of no more than three inches of water in five minutes.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the requirements specified on 35 IAC 218.582(a)(5) and 218.584(a). The Permittee shall comply with all the applicable testing requirements of Section 7.1.

**i. i. Operational and Production Requirements**

- A. Pursuant to Construction Permit #13050006, total loadout of gasoline through the loading racks shall not exceed 391,000,000 gal/yr when the VCU is in operation as a backup during outage of the VRU. [T1]
- B. Pursuant to Section 39.5(7)(b) of the Act, total loadout of gasoline through the loading racks shall not exceed 100,000,000 gal/month and 540,000,000 gal/yr when the VRU is in operation. [T1]
- C. Gasoline shall only be loaded through the loading rack when either existing VRU or the VCU is in operation.

**ii. Compliance Method (Operational and Production Requirements)**

Monitoring

- A. Pursuant to Section 39.5(7)(b) of the Act, compliance with the annual limit shall be determined each month plus the preceding 11 months (running 12 months total). Compliance with the monthly limit shall be determined on a daily basis and 30 day rolling for each month.

Recordkeeping

- B. Pursuant to Construction Permit #13050006, the Permittee shall keep the monthly and annual records of total throughput gasoline loadout processed by the loading racks.
- C. Pursuant to Construction Permit #13050006, the Permittee shall keep records of each date and time when the VCU is operating in place of the VRU.

**3. Non-Applicability Determinations**

- a. The loading racks are not subject to 35 IAC 218.122(a), because these emission units are equipped with a device that is equally effective in controlling emissions and according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108b.
- b. The loading racks are not subject to 35 IAC 218 Subpart TT, pursuant to 35 IAC 218.980(a), because these emission units are regulated by 35 IAC 218 Subpart Y.

**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.

BP Products North America, Inc. - Chicago Terminal  
I.D. No.: 031093AAH  
Permit No.: 95060058

Date Received: 09/20/2004  
Date Issued: TBD

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), through 4.4.2(i)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.7(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 3.7(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 63.11088, the Permittee must keep records and submit reports as specified in 40 CFR 63.11094 and 40 CFR 63.11095 and 40 CFR 63.11095(a)(2), (b) and (c).
  - A. For storage tanks complying with option 2(d) in Table 1 of 40 CFR 63 Subpart BBBBBB, the information specified in 40 CFR 63.1066.
- ii. Pursuant to 40 CFR 63.11085(b), 40 CFR 63.11087(e), 40 CFR 63.11089(g), and 40 CFR 63.11095(d), the Permittee shall submit a semiannual report including the number, duration, and a brief description of 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 shall also include a description of actions taken by the Permittee during a malfunction of the source to minimize emissions in accordance with 40 CFR 63.11085(a), including actions taken to correct a malfunction. The report may be submitted as a part of the semiannual compliance report.

4.5 Barge Loading/Unloading

**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>
Barge Loading and Unloading	VOM	Prior to 1980	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. **i. Volatile Organic Material Requirements (VOM)**
  - A. Pursuant to 35 IAC 218.301, No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of this 35 IAC 218.301 shall apply only to photochemically reactive material.
- ii. Compliance Method (VOM Requirements)
  - Monitoring
    - A. Pursuant to Section 39.5(7)(a) of the Act, compliance with hourly emission limit of 35 IAC 218.301 shall be determined based on the 30-day rolling .
  - 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/yr).
- b. **i. Operational and Production Requirements**
  - A. Pursuant to Section 39.5(7)(a) of the Act, interface, distillate and ethanol shall only be unloaded/loaded through the barge loading/unloading.
- ii. Compliance Method (Operational and Production Requirements)
  - Recordkeeping
    - A. Pursuant to Section 39.5(7)(b) of the Act,, the Permittee shall keep the monthly and annual records of each products and total throughput loadout processed by the barge loading/unloading.

**3. Non-Applicability Determinations**

- a. The barge loading/unloading facility is not subject to 35 IAC Part 218, Subpart GG, pursuant to 35 IAC 218.760(a), because these emission units are not permitted to load gasoline or crude oil.
- b. The barge loading/unloading is not subject to 35 IAC Part 218, Subpart TT, pursuant to 35 IAC 218.980(f), because barge loading facilities are not regulated by Subpart TT.
- c. The barge loading/unloading is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the barge loading/unloading does

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not use an add-on control device to achieve compliance with an emission limitation or standard.

- d. The barge loading/unloading is not subject to 40 CFR Part 63, Subpart Y, pursuant to 40 CFR 63.560(b)(1) and 63.561, because these emission units are not permitted to load gasoline or crude oil.

**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)
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.7(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 3.7(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.

**4.6 Fixed Roof Storage Tank in Non Gasoline Service**

**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>
10,000 Gallons Fixed Roof (Tank #4H)	VOM	1990	N/A	Submerged Loading pipe	None
40,111 Gallons Fixed Roof (Tank #1A)	VOM	1998	N/A	Submerged Loading pipe	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. i. Work Practices and Control Requirements**

Requirements of 35 IAC Part 218 Subpart B:

A. Pursuant to 35 IAC 218.122(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 gallons, unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108.

ii. Compliance Method (Work Practice Requirements)

Monitoring

A. Pursuant to 39.5(7)(a) of the Act, routine inspections shall be conducted once every six months.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of any maintenance and repair activities that resulted in a modification or reconstruction of the piece of equipment.

C. Pursuant to 35 IAC 218.129(f), the Permittee of each storage vessel specified in 35 IAC 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel.

**b. i. Operational and Production Requirements**

A. Pursuant to Section 39.5(7)(a) of the Act, the tank is not allowed to store gasoline.

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records and dates of any activity that resulted in a modification or reconstruction of the tank.
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the type of materials stored in the tanks.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the presence of the submerged loading pipe.

**3. Non-Applicability Determinations**

- a. The tanks are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities, 40 CFR Part 63 Subpart BBBB, because the tanks do not store any gasoline pursuant to 40 CFR 63.11082.
- b. The tanks are not subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels), 40 CFR Part 60 Subpart K, Ka, Kb, because the tanks are less than 19,812 gallon pursuant to 40 CFR 60.110b(a).
- c. Pursuant to 35 IAC 218.120(a), the control requirements of 35 IAC 218.120 are not applicable to the tanks less than 40,000 gallons.
- d. The tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the tanks use passive control measures, such as seals, lids, or roofs, that are not considered control devices.

**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 Condition 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 3.7(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.7(b).
- iii. The deviation reports shall contain at a minimum the following information:

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**Section 4 - Emission Unit Requirements**  
**4.6 - Fixed Roof Storage Tank in Non Gasoline Service**

- 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.

**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 in 35 IAC 201.210(a)

This condition is reserved for insignificant activities, as defined in 35 IAC 201.210 and 201.211, which are subject to specific standards promulgated pursuant Sections 111, 112, 165, or 173 of the Clean Air Act, see Sections 9.1(d) and 39.5(6)(a) of the Act. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

### 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>
Additive storage tanks (Tanks 2A, 3A, 8A, and 8B)	4	35 IAC 201.210(a)(1) and 201.211
Distillate Truck loading	1	35 IAC 201.210(a)(1) and 201.211
Oil water separator (Tank 6U)	1	35 IAC 201.210(a)(1) and 201.211
Underground loading rack collection (Tank 7U)	1	35 IAC 201.210(a)(1) and 201.211
Fugitives (Dock drain)	N/A	35 IAC 201.210(a)(1) and 201.211
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).	2	35 IAC 201.210(a)(4)
Product sample tank (Tank 8U)	6	35 IAC 201.210(a)(10)(B)
Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oil. Tank 27, 28,51,52,56	5	35 IAC 201.210(a)(11)

### 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 Condition 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.

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- d. Pursuant to 35 IAC 218.301, 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 provided in 35 IAC 218.302, 218.303, 218.304 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 218.122(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 218.122(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.
- f. Pursuant to 35 IAC 218 Subpart TT, VOM emissions from insignificant activities required to be included in determining applicability of 35 IAC 218 Subpart TT, in conjunction with applicable emission units in Section 4 of this permit, shall not equal or exceed 25 tons/yr.

**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 Condition 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.
- 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

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. Emissions Reduction Market System (ERMS) Requirements**

- a. Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS.
- b. Obligation to Hold Allotment Trading Units (ATUs)
- i. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 7.2(g), as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 7.2(d):
- A. VOM emissions from insignificant emission units and activities as identified in Section 6 of this permit, in accordance with 35 IAC 205.220.
- B. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 4 of this permit, in accordance with 35 IAC 205.225.
- C. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).
- D. Excess VOM emissions that are a consequence of an emergency as approved by the IEPA, pursuant to 35 IAC 205.750.
- E. VOM emissions from certain new and modified emission units as addressed by Condition 7.2(g)(ii), if applicable, in accordance with 35 IAC 205.320(f).
- ii. In accordance with 35 IAC 205.150(c)(2), notwithstanding the Condition 7.2(b)(i) above, if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 4 of this permit.
- c. Market Transactions
- i. As specified in 35 IAC 205.610(a), the source shall apply to the IEPA for and obtain authorization for a Transaction Account prior to conducting any market transactions.
- ii. Pursuant to 35 IAC 205.610(b), the Permittee shall promptly submit to the IEPA any revisions to the information submitted for its Transaction Account.
- iii. Pursuant to 35 IAC 205.620(a), the source shall have at least one account officer designated for its Transaction Account.
- iv. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the IEPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the IEPA for entry into the Transaction Account database.
- d. Emissions Excursion Compensation
- Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 7.2(b), it shall provide emissions excursion compensation in accordance with the following:

- i. Upon receipt of an Excursion Compensation Notice issued by the IEPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
  - A. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - B. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- ii. If requested in accordance with paragraph 7.2(d)(iii) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the IEPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- iii. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the Owner or Operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the IEPA, rather than purchased from the ACMA.

e. Quantification of Seasonal VOM Emissions

- i. Pursuant to 35 IAC 205.315(b), the methods and procedures specified in Sections 3 and 4 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions:

No exceptions
- ii. In accordance with 35 IAC 205.750, the Permittee shall report emergency conditions at the source to the IEPA if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
  - A. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency.
  - B. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

f. Annual Account Reporting

- i. Pursuant to 35 IAC 205.300, for each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the IEPA for the seasonal allotment period. This report shall include the following information:
  - A. Actual seasonal emissions of VOM from the source.
  - B. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations.
  - C. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337.

- D. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the IEPA.
  - E. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).
  - F. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- ii. This report shall be submitted by November 10 of each year, for the preceding seasonal allotment period.
- g. Allotment of ATUs to the Source
- i. A. The allotment of ATUs to this source is 348 ATUs per seasonal allotment period.
  - B. This allotment of ATUs reflects the IEPA's determination that the source's baseline emissions were 39.41 tons per season.
  - C. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 7.2(i) of this permit.
  - D. ATUs will be issued to the source's Transaction Account by the IEPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
- ii. Contingent Allotments for New or Modified Emission Units
- None
- iii. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
- A. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630.
  - B. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720.
  - C. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.
- h. Recordkeeping for ERMS
- Pursuant to 35 IAC 205.700(a), the Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS:
- i. Seasonal component of the Annual Emissions Report.

- ii. Information on actual VOM emissions, as specified in detail in Sections 3 and 4 of this permit and Condition 7.2(e)(i).
- iii. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

i. Exclusions from Further Reductions

- i. A. Pursuant to 35 IAC 205.405(a), VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following:
  - I. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA.
  - II. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines.
  - III. An emission unit for which a LAER demonstration has been approved by the IEPA on or after November 15, 1990.
- B. Pursuant to 35 IAC 205.405(a) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above:
  - Tank 7
  - Tank 8
  - Tank 21
  - Tank 58
  - Tank 59
- ii. A. Pursuant to 35 IAC 205.405(b), VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT.
- B. Pursuant to 35 IAC 205.405(b) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above:
  - None

**3. 40 CFR 60 Subpart A Requirements (NSPS)**

**a. 40 CFR 60 Subpart A and Subpart XX, Standards of Performance for Bulk Gasoline Terminals**

Pursuant to 40 CFR 60 Subpart A and Subpart XX, 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 except that 60.503(a) specifies that three test runs are not required as would normally be specified by 60.8(f)	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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**4. 40 CFR 63 Subpart A Requirements (NESHAP)**

**a. 40 CFR 63 Subpart A and Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities**

Pursuant to 40 CFR 63 Subpart A and Subpart BBBBBB, Table 3, 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 63.1	Yes, specific requirements given in 40 CFR 63.11081.	Applicability	Initial applicability determination; applicability after standard established; permit requirements; extensions, notifications
40 CFR 63.1(c)(2)	Yes, 40 CFR 63.11081(b) of subpart BBBBBB exempts identified area sources from the obligation to obtain title V operating permits.	Title V permit	Requirements for obtaining a Title V permit from the applicable permitting authority
40 CFR 63.2	Yes, additional definitions in 40 CFR 63.11100.	Definitions	Definitions for Part 63 standards
40 CFR 63.3	Yes.	Units and Abbreviations	Units and abbreviations for Part 63 standards
40 CFR 63.4	Yes.	Prohibited Activities and Circumvention	Prohibited activities, circumvention, severability
40 CFR 63.5	Yes.	Construction/Reconstruction	Applicability; applications; approvals
40 CFR 63.6(a)	Yes.	Compliance with Standards/Operation & Maintenance Applicability	General Provisions apply unless compliance extension; General Provisions apply to area sources that become major
40 CFR 63.6(b)(1)-(4)	Yes.	Compliance Dates for New and Reconstructed Sources	Standards apply at effective date; 3 years after effective date; upon startup; 10 years after construction or reconstruction commences for CAA section 112(f)
40 CFR 63.6(b)(5)	Yes.	Notification	Must notify if commenced construction or reconstruction after proposal
40 CFR 63.6(b)(6)		[Reserved]	
40 CFR 63.6(b)(7)	No.	Compliance Dates for New and Reconstructed Area Sources that Become Major	Area sources that become major must comply with major source standards immediately upon becoming major.
40 CFR 63.6(c)(1)-(2)	No, 40 CFR 63.11083 specifies the compliance dates.	Compliance Dates for Existing Sources	Comply according to date in this subpart, which must be no later than 3 years after effective date; for CAA section 112(f) standards, comply within 90 days of effective date unless compliance extension
40 CFR 63.6(c)(3)-(4)		[Reserved]	

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**Section 7 - Other Requirements**  
**7.4 - 40 CFR 63 Subpart A**  
**Requirements (NESHAP)**

General Provision Citation	General Provision Applicable?	Subject of Citation	Explanation (if required)
40 CFR 63.6(c)(5)	No.	Compliance Dates for Existing Area Sources that Become Major	Area sources that become major must comply with major source standards by date indicated in this subpart or by equivalent time period (e.g., 3 years)
40 CFR 63.6(d)		[Reserved]	
40 CFR 63.6(e)(1)(i)	No. See 40 CFR 63.11085 for general duty requirement.	General duty to minimize emissions	Operate to minimize emissions at all times; information Administrator will use to determine if operation and maintenance requirements were met
40 CFR 63.6(e)(1)(ii)	No.	Requirement to correct malfunctions as soon as possible	Owner or operator must correct malfunctions as soon as possible
40 CFR 63.6(e)(2)		[Reserved]	
40 CFR 63.6(e)(3)	No.	Startup, Shutdown, and Malfunction (SSM) plan	Requirement for SSM plan; content of SSM plan; actions during SSM
40 CFR 63.6(f)(1)	No.	Compliance Except During SSM	You must comply with emission standards at all times except during SSM
40 CFR 63.6(f)(2)-(3)	Yes.	Methods for Determining Compliance	Compliance based on performance test, operation and maintenance plans, records, inspection
40 CFR 63.6(g)(1)-(3)	Yes.	Alternative Standard	Procedures for getting an alternative standard
40 CFR 63.6(h)(1)	No.	Compliance with Opacity/VE Standards	You must comply with opacity/VE standards at all times except during SSM
40 CFR 63.6(h)(2)(i)	No.	Determining Compliance with Opacity/VE Standards	If standard does not State test method, use EPA Method 9 for opacity in Appendix A of Part 60 of this chapter and EPA Method 22 for VE in appendix A of part 60 of this chapter
40 CFR 63.6(h)(2)(ii)		[Reserved]	
40 CFR 63.6(h)(2)(iii)	No.	Using Previous Tests to Demonstrate Compliance with Opacity/VE Standards	Criteria for when previous opacity/VE testing can be used to show compliance with this subpart
40 CFR 63.6(h)(3)		[Reserved]	
40 CFR 63.6(h)(4)	No.	Notification of Opacity/VE Observation Date	Must notify Administrator of anticipated date of observation
40 CFR 63.6(h)(5)(i), (iii)-(v)	No.	Conducting Opacity/VE Observations	Dates and schedule for conducting opacity/VE observations
40 CFR 63.6(h)(5)(ii)	No.	Opacity Test Duration and Averaging Times	Must have at least 3 hours of observation with 30 6-minute averages
40 CFR 63.6(h)(6)	No.	Records of Conditions During Opacity/VE Observations	Must keep records available and allow Administrator to inspect
40 CFR 63.6(h)(7)(i)	No.	Report Continuous Opacity Monitoring System (COMS) Monitoring Data from Performance Test	Must submit COMS data with other performance test data

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**7.4 - 40 CFR 63 Subpart A**  
**Requirements (NESHAP)**

General Provision Citation	General Provision Applicable?	Subject of Citation	Explanation (if required)
40 CFR 63.6(h) (7) (ii)	No.	Using COMS Instead of EPA Method 9	Can submit COMS data instead of EPA Method 9 results even if rule requires EPA Method 9 in Appendix A of Part 60 of this chapter, but must notify Administrator before performance test
40 CFR 63.6(h) (7) (iii)	No.	Averaging Time for COMS During Performance Test	To determine compliance, must reduce COMS data to 6-minute averages
40 CFR 63.6(h) (7) (iv)	No.	COMS Requirements	Owner/operator must demonstrate that COMS performance evaluations are conducted according to 40 CFR 63.8(e); COMS are properly maintained and operated according to 40 CFR 63.8(c) and data quality as 40 CFR 63.8(d)
40 CFR 63.6(h) (7) (v)	No.	Determining Compliance with Opacity/VE Standards	COMS is probable but not conclusive evidence of compliance with opacity standard, even if EPA Method 9 observation shows otherwise. Requirements for COMS to be probable evidence-proper maintenance, meeting Performance Specification 1 in appendix B of part 60 of this chapter, and data have not been altered
40 CFR 63.6(h) (8)	No.	Determining Compliance with Opacity/VE Standards	Administrator will use all COMS, EPA Method 9 (in appendix A of part 60 of this chapter), and EPA Method 22 (in Appendix A of Part 60 of this chapter) results, as well as information about operation and maintenance to determine compliance
40 CFR 63.6(h) (9)	No.	Adjusted Opacity Standard	Procedures for Administrator to adjust an opacity standard
40 CFR 63.6(i) (1)-(14)	Yes.	Compliance Extension	Procedures and criteria for Administrator to grant compliance extension
40 CFR 63.6(j)	Yes.	Presidential Compliance Exemption	President may exempt any source from requirement to comply with this subpart
40 CFR 63.7(a) (2)	Yes.	Performance Test Dates	Dates for conducting initial performance testing; must conduct 180 days after compliance date
40 CFR 63.7(a) (3)	Yes.	Section 114 Authority	Administrator may require a performance test under CAA Section 114 at any time
40 CFR 63.7(b) (1)	Yes.	Notification of Performance Test	Must notify Administrator 60 days before the test
40 CFR 63.7(b) (2)	Yes.	Notification of Re-scheduling	If have to reschedule performance test, must notify Administrator of rescheduled date as soon as practicable and without delay
40 CFR 63.7(c)	Yes.	Quality Assurance (QA)/Test Plan	Requirement to submit site-specific test plan 60 days before the test or on date Administrator agrees with; test plan approval procedures; performance audit requirements; internal and external QA procedures for testing
40 CFR 63.7(d)	Yes.	Testing Facilities	Requirements for testing facilities

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**7.4 - 40 CFR 63 Subpart A**  
**Requirements (NESHAP)**

General Provision Citation	General Provision Applicable?	Subject of Citation	Explanation (if required)
63.7(e) (1)	No, 40 CFR 63.11092(g) specifies conditions for conducting performance tests.	Conditions for Conducting Performance Tests	Performance test must be conducted under representative conditions
40 CFR 63.7(e) (2)	Yes.	Conditions for Conducting Performance Tests	Must conduct according to this subpart and EPA test methods unless Administrator approves alternative
40 CFR 63.7(e) (3)	Yes, except for testing conducted under 40 CFR 63.11092(a).	Test Run Duration	Must have three test runs of at least 1 hour each; compliance is based on arithmetic mean of three runs; conditions when data from an additional test run can be used
40 CFR 63.7(f)	Yes.	Alternative Test Method	Procedures by which Administrator can grant approval to use an intermediate or major change, or alternative to a test method
40 CFR 63.7(g)	Yes.	Performance Test Data Analysis	Must include raw data in performance test report; must submit performance test data 60 days after end of test with the notification of compliance status; keep data for 5 years
40 CFR 63.7(h)	Yes.	Waiver of Tests	Procedures for Administrator to waive performance test
40 CFR 63.8(a) (1)	Yes.	Applicability of Monitoring Requirements	Subject to all monitoring requirements in standard
40 CFR 63.8(a) (2)	Yes.	Performance Specifications	Performance specifications in appendix B of 40 CFR Part 60 apply
40 CFR 63.8(a) (3)		[Reserved]	
40 CFR 63.8(a) (4)	Yes.	Monitoring of Flares	Monitoring requirements for flares in 40 CFR 63.11 apply
40 CFR 63.8(b) (1)	Yes.	Monitoring	Must conduct monitoring according to standard unless Administrator approves alternative
40 CFR 63.8(b) (2)-(3)	Yes.	Multiple Effluents and Multiple Monitoring Systems	Specific requirements for installing monitoring systems; must install on each affected source or after combined with another affected source before it is released to the atmosphere provided the monitoring is sufficient to demonstrate compliance with the standard; if more than one monitoring system on an emission point, must report all monitoring system results, unless one monitoring system is a backup
40 CFR 63.8(c) (1)	Yes.	Monitoring System Operation and Maintenance	Maintain monitoring system in a manner consistent with good air pollution control practices
40 CFR 63.8(c) (1) (i)	No.	Operation and Maintenance of CMS	Must maintain and operate each CMS as specified in 40 CFR 63.6(e) (1)
40 CFR 63.8(c) (1) (ii)	Yes.	Operation and Maintenance of CMS	Must keep parts for routine repairs readily available

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**7.4 - 40 CFR 63 Subpart A**  
**Requirements (NESHAP)**

General Provision Citation	General Provision Applicable?	Subject of Citation	Explanation (if required)
40 CFR 63.8(c) (1) (iii)	No.	Operation and Maintenance of CMS	Requirement to develop SSM Plan for CMS
40 CFR 63.8(c) (2)-(8)	Yes.	CMS Requirements	Must install to get representative emission or parameter measurements; must verify operational status before or at performance test
40 CFR 63.8(d)	No.	CMS Quality Control	Requirements for CMS quality control, including calibration, etc.; must keep quality control plan on record for 5 years; keep old versions for 5 years after revisions
40 CFR 63.8(e)	Yes.	CMS Performance Evaluation	Notification, performance evaluation test plan, reports
40 CFR 63.8(f) (1)-(5)	Yes.	Alternative Monitoring Method	Procedures for Administrator to approve alternative monitoring
40 CFR 63.8(f) (6)	Yes.	Alternative to Relative Accuracy Test	Procedures for Administrator to approve alternative relative accuracy tests for CEMS
40 CFR 63.8(g)	Yes.	Data Reduction	COMS 6-minute averages calculated over at least 36 evenly spaced data points; CEMS 1 hour averages computed over at least 4 equally spaced data points; data that cannot be used in average
40 CFR 63.9(a)	Yes.	Notification Requirements	Applicability and State delegation
40 CFR 63.9(b) (1)-(2), (4)-(5)	Yes.	Initial Notifications	Submit notification within 120 days after effective date; notification of intent to construct/reconstruct, notification of commencement of construction/reconstruction, notification of startup; contents of each
40 CFR 63.9(c)	Yes.	Request for Compliance Extension	Can request if cannot comply by date or if installed best available control technology or lowest achievable emission rate
40 CFR 63.9(d)	Yes.	Notification of Special Compliance Requirements for New Sources	For sources that commence construction between proposal and promulgation and want to comply 3 years after effective date
40 CFR 63.9(e)	Yes.	Notification of Performance Test	Notify Administrator 60 days prior
40 CFR 63.9(f)	No.	Notification of VE/Opacity Test	Notify Administrator 30 days prior
40 CFR 63.9(g)	Yes, however, there are no opacity standards.	Additional Notifications When Using CMS	Notification of performance evaluation; notification about use of COMS data; notification that exceeded criterion for relative accuracy alternative
40 CFR 63.9(h) (1)-(6)	Yes, except as specified in 40 CFR 63.11095(a) (4); also, there are no opacity standards.	Notification of Compliance Status	Contents due 60 days after end of performance test or other compliance demonstration, except for opacity/VE, which are due 30 days after; when to submit to Federal vs. State authority

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**Section 7 - Other Requirements**  
**7.4 - 40 CFR 63 Subpart A**  
**Requirements (NESHAP)**

General Provision Citation	General Provision Applicable?	Subject of Citation	Explanation (if required)
40 CFR 63.9(i)	Yes.	Adjustment of Submittal Deadlines	Procedures for Administrator to approve change when notifications must be submitted
40 CFR 63.9(j)	Yes.	Change in Previous Information	Must submit within 15 days after the change
40 CFR 63.10(a)	Yes.	Record-keeping/Reporting	Applies to all, unless compliance extension; when to submit to Federal vs. State authority; procedures for owners of more than one source
40 CFR 63.10(b) (1)	Yes.	Record-keeping/Reporting	General requirements; keep all records readily available; keep for 5 years
40 CFR 63.10(b) (2) (i)	No.	Records related to SSM	Recordkeeping of occurrence and duration of startups and shutdowns
40 CFR 63.10(b) (2) (ii)	No. See 40 CFR 63.11094(g) for recordkeeping of (1) occurrence and duration and (2) actions taken during malfunction.	Records related to SSM	Recordkeeping of malfunctions
40 CFR 63.10(b) (2) (iii)	Yes.	Maintenance records	Recordkeeping of maintenance on air pollution control and monitoring equipment
40 CFR 63.10(b) (2) (iv)	No.	Records Related to SSM	Actions taken to minimize emissions during SSM
40 CFR 63.10(b) (2) (v)	No.	Records Related to SSM	Actions taken to minimize emissions during SSM
40 CFR 63.10(b) (2) (vi)-(xi)	Yes.	CMS Records	Malfunctions, inoperative, out-of-control periods
40 CFR 63.10(b) (2) (xii)	Yes.	Records	Records when under waiver
40 CFR 63.10(b) (2) (xiii)	Yes.	Records	Records when using alternative to relative accuracy test
40 CFR 63.10(b) (2) (xiv)	Yes.	Records	All documentation supporting initial notification and notification of compliance status
40 CFR 63.10(b) (3)	Yes.	Records	Applicability determinations
40 CFR 63.10(c)	No.	Records	Additional records for CMS
40 CFR 63.10(d) (1)	Yes.	General Reporting Requirements	Requirement to report
40 CFR 63.10(d) (2)	Yes.	Report of Performance Test Results	When to submit to Federal or State authority
40 CFR 63.10(d) (3)	No.	Reporting Opacity or VE Observations	What to report and when
40 CFR 63.10(d) (4)	Yes.	Progress Reports	Must submit progress reports on schedule if under compliance extension

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**7.4 - 40 CFR 63 Subpart A**  
**Requirements (NESHAP)**

General Provision Citation	General Provision Applicable?	Subject of Citation	Explanation (if required)
40 CFR 63.10(d)(5)	No. See 40 CFR 63.11095(d) for malfunction reporting requirements.	SSM Reports	Contents and submission
40 CFR 63.10(e)(1)-(2)	No.	Additional CMS Reports	Must report results for each CEMS on a unit; written copy of CMS performance evaluation; 2-3 copies of COMS performance evaluation
40 CFR 63.10(e)(3)(i)-(iii)	Yes, note that 40 CFR 63.11095 specifies excess emission events for this subpart.	Reports	Schedule for reporting excess emissions
40 CFR 63.10(e)(3)(iv)-(v)	Yes, 40 CFR 63.11095 specifies excess emission events for this subpart.	Excess Emissions Reports	Requirement to revert to quarterly submission if there is an excess emissions and parameter monitor exceedances (now defined as deviations); provision to request semiannual reporting after compliance for 1 year; submit report by 30th day following end of quarter or calendar half; if there has not been an exceedance or excess emissions (now defined as deviations), report contents in a statement that there have been no deviations; must submit report containing all of the information in 40 CFR40 CFR 63.8(c)(7)- (8) and 63.10(c)(5)-(13)
40 CFR 63.10(e)(3)(vi)-(viii)	Yes.	Excess Emissions Report and Summary Report	Requirements for reporting excess emissions for CMS; requires all of the information in 40 CFR40 CFR 63.8(c)(7)- (8) and 63.10(c)(5)-(13)
40 CFR 63.10(e)(4)	Yes.	Reporting COMS Data	Must submit COMS data with performance test data
40 CFR 63.10(f)	Yes.	Waiver for Recordkeeping/Reporting	Procedures for Administrator to waive
40 CFR 63.11(b)	Yes, the section references 40 CFR 63.11(b).	Flares	Requirements for flares
40 CFR 63.12	Yes.	Delegation	State authority to enforce standards
40 CFR 63.13	Yes.	Addresses	Addresses where reports, notifications, and requests are sent
40 CFR 63.14	Yes.	Incorporations by Reference	Test methods incorporated by reference
40 CFR 63.15	Yes.	Availability of Information	Public and confidential information

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**5. 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 7.5(e) below, pursuant to 40 CFR Part 64 as submitted in the source's CAM plan application.

**c. Monitoring - Recordkeeping**

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
7.5.1	4.4	Loading Racks	VOM

**Table 7.5.1 - CAM Plan**

Emission Unit Section:	4.4	
PSEU Designation:	Loading Rack	
Pollutant:	VOM	
Indicators:	#1) Pilot Flame	
The Monitoring Approach Used to Measure the Indicators:	Ultraviolet Beam Sensor	
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Positive Parameter Value (i.e., flame on). Excursion is defined as absence of flame when truck loading is occurring.	
Quality Improvement Plan (QIP) Threshold Levels:	10 days per 6-month semiannual period	
The Specifications for Obtaining Representative Data:	Monitor installed in proximity of the pilot light	
Verification Procedures to Confirm the Operational Status of the Monitoring:	Semi-annual VCU maintenance is performed	
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Semi-annual VCU maintenance and operation according to manufacturer instructions	
The Monitoring Frequency:	Pilot flame presence is monitored continuously	
The Data Collection Procedures That Will Be Used:	Daily logsheet maintained. Alarms are recorded in log book.	
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	Instantaneous	

**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)	132.21
Sulfur Dioxide	(SO <sub>2</sub> )	----
Particulate Matter	(PM)	1.26
Nitrogen Oxides	(NO <sub>x</sub> )	
HAP, not included in VOM or PM	(HAP)	----
Total		133.47

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

<i>Section</i>	<i>Emission Units</i>	<i>Description</i>
4.1	Internal Floating Roof Tanks (Non-NSPS Tanks)	The existing internal floating roof storage tanks are operated to store various petroleum products. (Existing, for the purpose of this permit, means constructed prior to June 11, 1973.) Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading. The section 4.1 includes all the applicable requirements on gasoline service.
4.2	Internal Floating Roof Tanks (Non-NSPS Tanks)	Same tanks described in 4.1 but the section includes all the applicable requirements during non-gasoline service.
4.3	Internal Floating Roof Tanks	Ethanol storage Tanks. The Permittee operates internal floating roof storage tanks to store ethanol. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.
4.4	Fixed Roof Storage Tank in Non-Gasoline Service	Storage Tanks- non-gasoline service
4.5	Loading Stations	The truck loading rack is used to load various petroleum products that include gasoline, and ethanol. The loading rack consists of five loading bays. The VOM emissions from the truck loading rack occur when material is loaded into delivery vehicles. A vapor recovery unit is used to capture and recover the emissions that occur as a result of displacement of vapors in the delivery vehicles during gasoline loading, ethanol loading and distillate loading into compartments that held gasoline as the immediately previous load. The Permittee is authorized enhancement of the existing Vapor Recovery Unit (VRU) system including replacement of the carbon beds and upgrade of the vacuum blower and installation of features (pipe fittings, foundation, utilities, etc.) to allow use of a portable Vapor Combustion Unit (VCU) as an alternative to the VRU. Unloading of material occurs at various sites at the terminal. The VOM emissions from unloading material are accounted for in the working losses of the storage tanks the material is loaded into, with the exception of fugitive emissions that are attributed to leaking components, i.e., valves, flanges, ...etc.
4.6	Barge Facility	The barge facility is used to load distillate and interface and unload ethanol. Barge loading does not include gasoline as defined in 35 IAC 211. The VOM emissions from the barge loading occur, as a result of displacement of vapors in the barges, during loading.

## 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 Compliance Section</p> <p style="text-align: center;">IEPA Stack Test Specialist</p> <p style="text-align: center;">IEPA Air Quality Planning Section</p> <p style="text-align: center;">IEPA Air Regional Field Operations Regional Office #1</p> <p style="text-align: center;">IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance &amp; Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p>
	<p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p>
	<p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p style="text-align: center;">USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604</p> <p>Phone No.: 312/353-2000</p>

**Attachment 4 - Example Certification by a Responsible Official**

<b>SIGNATURE BLOCK</b>	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
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))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

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