

217/782-2113

RENEWAL
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Nicor Gas
Attn: Claudia Macholz
1844 Ferry Road
Naperville, Illinois 60563-9600

I.D. No.: 105822AAD
Application No.: 95120024

Date Received: August 28, 2006
Date Issued: TBD
Expiration Date¹: TBD

Operation of: Natural Gas Storage Facility
Source Location: 2 Miles East Route 179 and 1-1/2 Miles South Route 17,
Ancona, Livingston County, 61364
Responsible Official: Gary R. Bartlett, VP of Supply Operations

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

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

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

ECB:KKD:psj

cc: Illinois EPA, FOS, Region 3
CES
Lotus Notes

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

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1.0 SOURCE IDENTIFICATION

1.1 Source

Nicor Gas - Station #70
2 Miles East Route 179 and 1-½ Miles South Route 17
Ancona, Illinois 61364

I.D. No.: 105822AAD
Standard Industrial Classification: 4924, Natural Gas Distribution

1.2 Owner/Parent Company

Nicor Gas
1844 Ferry Road
Naperville, Illinois 60563-9600

1.3 Operator

Nicor Gas
1844 Ferry Road
Naperville, Illinois 60563-9600

Claudia Macholz
630/388-2456

1.4 General Source Description

The source's primary function is to transmit natural gas to and from high-pressure underground storage fields. Natural gas is injected into the storage fields during low demand periods and withdrawn from storage during high demand periods. Natural gas fired compressors are used to inject the natural gas pressure into the underground storage fields. When the natural gas is withdrawn from storage, and prior to delivery to the distribution pipeline system, water is removed from the natural gas by triethylene glycol dehydration units.

1.5 Title I Conditions

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

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

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
Hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
KW	kilowatts
Lb	pound
MmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOL	Volatile Organic Liquids
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

- Fugitive Facility Roads
- Odorant Storage Tank
- Pipeline Heaters
- Grit Blast Booth
- 50-300 Gallon Methanol Storage Tanks
- Ambitrol Storage Tanks
- Oil Storage Tanks
- TEG Storage Tanks
- Comfort Heaters
- Parts Washers

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

None

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

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

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

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

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

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

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

3.2 Compliance with Applicable Requirements

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

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

3.3 Addition of Insignificant Activities

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

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
EC13	3,000 Hp Natural Gas Fired Engine	1970	Low NO _x Control System
EC14	3,000 Hp Natural Gas Fired Engine	1970	Low NO _x Control System
EC15	3,000 Hp Natural Gas Fired Engine	1972	Low NO _x Control System
SC21	1,500 Hp Natural Gas Fired Engine	1967	None
SC22	1,500 Hp Natural Gas Fired Engine	1969	None
CC23	4,000 Hp Natural Gas Fired Engine	1994	None
SC31	550 Hp Natural Gas Fired Engine	1972	None
SC32	1,200 Hp Natural Gas Fired Engine	1974	None
EG1	500 Hp Natural Gas Fired Engine	1975	None
EG2	764 Hp Natural Gas Fired Engine	2004	None
EG3	500 Hp Natural Gas Fired Engine	1993	None
Reboiler 4 (VV1)	TEG Dehydration Unit	1969	Flare
Reboiler 5 (VV2)	TEG Dehydration Unit	1973	Flare
Reboiler 6 (VV3)	TEG Dehydration Unit	1977	Flare
Reboiler 7 (VV1-G)	TEG Dehydration Unit	Post-1972	Flare
Reboiler 8 (VV2-G)	TEG Dehydration Unit	Post-1972	Flare
Reboiler 9 (VV3-G)	TEG Dehydration Unit	Post-1972	Flare
Reboiler 10 (VV4-G)	TEG Dehydration Unit	Post-1972	Flare
Reboiler 1 (VV1-A)	TEG Dehydration Unit	Post-1972	Flare
Reboiler 2 (VV2-A)	TEG Dehydration Unit	Post-1972	Flare
Reboiler 3 (VV3-A)	TEG Dehydration Unit	Post-1972	Flare
Methanol1	12,000 gallon methanol storage tank	---	None
Methanol2	12,000 gallon methanol storage tank	---	None
UST1	2,000 Gallon Gasoline Storage Tank	---	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Applicability of Clean Air Act Permit Program (CAAPP)

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

5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated attainment or unclassifiable for the National Ambient Air Quality Standards for all criteria pollutants (CO, lead, NO₂, ozone, PM_{2.5}, PM₁₀, SO₂).

5.3 Source-Wide Applicable Provisions and Regulations

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

5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

5.3.3 Ozone Depleting Substances

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

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

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

5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.5 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).
- b. 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.

5.3.6 Episode Action Plan

- a. Pursuant to 35 IAC 244.141, the Permittee shall maintain at the source and have on file with the Illinois EPA a written Episode Action Plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures.
- b. The Permittee shall immediately implement the appropriate steps described in this 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.

- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.
- d. The revised plan, submitted by the Permittee on August 3rd, 2011, (which contains a completed APC Form 100 and attached Tables I-V identifying additional actions to be implemented), 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 SO₂, PM₁₀, NO₂, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161-244.165.

Any future revision to the aforementioned plan made by the Permittee during the permit term is automatically incorporated by reference provided that said revision is not expressly disapproved, in writing, by the Illinois EPA within 30 days of receipt of said revision. In the event that the Illinois EPA notifies the Permittee of a deficiency with any revision to the plan, the Permittee shall be required to revise and resubmit the plan within 30 days of receipt of notification to address the deficiency [415 ILCS 39.5(7)(a)].

5.4 Source-Wide Non-Applicability of Regulations of Concern

- 5.4.1 This source is not subject to 40 CFR Part 63, Subpart HHH, Natural Gas Transmission and Storage Facilities because the source is not a major source of HAPs. (See also Condition 5.6.2)

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there are requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	47.33
Sulfur Dioxide (SO ₂)	0.15
Particulate Matter (PM)	2.12
Nitrogen Oxides (NO _x)	500.00
HAP, not included in VOM or PM	10.00
Total	549.61

5.6.2 Emissions of Hazardous Air Pollutants

Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source shall be less than 9.6 tons/year for each individual HAP and 24 tons/year for all HAPs combined. The above limitations were established in Construction Permit 03080054. 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). This condition is being imposed so that the source is not a major source of HAP emissions. The Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements of Conditions 5.7.2 and 5.9.2.

Note: Emissions of HAPs are maintained at less than major source thresholds as a result of the limitations in Section 7.1.6(c).

5.6.3 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for PSD, state rules for MSSCAM, or Section 502(b)(10) of the CAA.

5.7 Source-Wide Testing Requirements

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

- a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All

such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].

- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.7.2 HAP Testing to Verify Minor Source Status

Pursuant to Condition 5.7.1 and to verify compliance with the requirements of Condition 5.6.2, that this source is not a major source of HAPs, the following testing requirements are established:

- a. If in the previous calendar year, the source exceeded the production limitations in 7.1.6(c), then testing for HAPs shall be conducted as follows:

Testing shall be conducted using methods that would be acceptable under the federal National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR Part 63, Subpart ZZZZ. For multiple engines, the source owner or operator shall test largest turbine which makes the largest contributions to individual and total HAP emissions.

- b. The testing shall be done within 180 days of the exceedance.
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Source-Wide Monitoring Requirements

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particular 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).

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

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

5.9.2 Records for HAP Emissions

- a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7)(b) of the Act.
- b. If testing is required by Condition 5.7.2, the Permittee shall keep records of the testing, including the test date, conditions, methodologies, calculations, test results, and any discrepancies between the test results.

5.9.3 Retention and Availability of Records

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

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

- a. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
 - i. Requirements in Condition 5.3.2 and 5.3.3
 - ii. Requirements in Condition 5.6
- b. All such deviations shall be summarized and reported as part of the semiannual monitoring report required by Condition 8.6.1.
- c. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the semiannual monitoring reports required by in Condition 8.6.1.
- d. All required deviation reports described in Condition 5.9.1 above shall contain the following information:
 - i. Date and time of the deviation;
 - ii. Emission units(s)/operation involved;
 - iii. The duration of the event;
 - iv. Probable cause of the deviation;
 - v. Any corrective actions or preventative measures taken.

5.10.2 Annual Emissions Report

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

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source.

5.12 Source-Wide Compliance Procedures

5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed by the testing in Condition 5.7, the monitoring in Condition 5.8, the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7

(Unit Specific Conditions for Specific Emission Units) of this permit.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Engines

7.1.1 Description

The engines are process emission units used to provide power for the natural gas compressors and to provide power to electric generators. All engines are powered by natural gas.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EC13	3,000 Hp Natural Gas Fired Engine	Low NO _x Control System
EC14	3,000 Hp Natural Gas Fired Engine	Low NO _x Control System
EC15	3,000 Hp Natural Gas Fired Engine	Low NO _x Control System
SC21	1,500 Hp Natural Gas Fired Engine	None
SC22	1,500 Hp Natural Gas Fired Engine	None
CC23	4,000 Hp Natural Gas Fired Engine	None
SC31	550 Hp Natural Gas Fired Engine	None
SC32	1,200 Hp Natural Gas Fired Engine	None
EG1	500 Hp Natural Gas Fired Engine	None
EG2	764 Hp Natural Gas Fired Engine	None
EG3	500 Hp Natural Gas Fired Engine	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected engines" for the purpose of these unit-specific conditions, are engines described in Conditions 7.1.1 and 7.1.2. The affected lean-burn natural gas fired engines are EC-13, EC-14, EC-15, SC-21, SC-22, and EG-2. The affected rich-burn natural gas fired engines are SC-31 and SC-32.
- b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm [35 IAC 214.301].
- d. 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 source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart G shall apply only to photochemically reactive material [35 IAC 215.301].
- e. The affected engines are subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR Part 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines (RICE).
- f. For the affected engines, the Permittee shall comply with the applicable emission standards, operating, testing, monitoring, recordkeeping, and reporting and notification requirements of the Engine NESHAP that are set forth in this permit; except during periods of startup, as provided by 40 CFR 63.6625(b) and 40 CFR 63.6675.
 - i. Pursuant to 40 CFR 63.6603(a), for the affected lean-burn engines, the Permittee shall:
 - A. Reduce carbon monoxide (CO) emissions by at least 93 percent, as specified in Table 2d, Item 8(b) of the Engine NESHAP; or
 - B. Limit the concentration of CO in the exhaust to 47 ppmvd at 15 percent oxygen (O₂), as specified in Table 2d, Item 8(a) of the Engine NESHAP.
 - ii. Pursuant to 40 CFR 63.6603(a), for the affected rich-burn engines, the Permittee shall:
 - A. Reduce formaldehyde emissions by at least 76 percent, as specified in Table 2d, Item 10(b) of the Engine NESHAP; or
 - B. Limit the concentration of formaldehyde in the exhaust to 2.7 ppmvd at 15 percent O₂ as specified in Table 2d, Item 10(a) of the Engine NESHAP.

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected engines not being subject to the requirements of 35 IAC 212.321 or 212.322, because due to the unique nature of these units, a

process weight rate cannot be set so that such rules cannot reasonably be applied.

- b. This permit is issued based on the affected engines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected engines do not use an add-on control device to achieve compliance with an emission limitation or standard.
- c. The affected engines are not subject to 35 IAC Part 217, Subpart Q: Stationary Reciprocating Internal Combustion Engines and Turbines, because the affected diesel engine is not a stationary reciprocating internal combustion engine listed in Appendix G of that Part, pursuant to 35 IAC 217.386.
- d. The affected engines are not subject to the New Source Performance Standards (NSPS) for Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII, because the affected engines are by definition, 40 CFR 60.4219, spark ignition engines rather than compression ignition engines.

7.1.5 Control Requirements and Work Practices

- a. Pursuant to Section 39.5(7), pipeline quality natural gas shall be the only fuel fired in the affected engines.
- b. Pursuant to the Engine NESHAP:
 - i. Pursuant to 40 CFR 63.6603(a) and Table 2b of the Engine NESHAP, The Permittee shall operate the affected lean-burn engines and affected oxidation systems as follows:
 - A. The pressure drop across the system shall not vary by more than 2 inches of water at 100 percent load and shall be maintained within 10 percent from the pressure drop across the system measured during the initial performance test; and
 - B. Operate each affected engine such that the inlet temperature to oxidation system(s) is maintained between 450 and 1350°F.
 - ii. Pursuant to 40 CFR 63.6603(a) and Table 1b of the Engine NESHAP, the Permittee shall operate each affected rich-burn engine and affected NCR system as follows:
 - A. The pressure drop across the NSCR system shall not vary by more than 2 inches of water at 100 percent load and shall be maintained within 10

percent from the pressure drop across the NCR systems measured during the initial performance test; and

- B. Operate the engine such that the catalyst inlet temperature to the oxidation catalyst system is maintained between 750 and 1250°F.
- iii. Pursuant to 40 CFR 63.6625(h), for each affected engine, the Permittee shall comply with the applicable requirement for the startup of an engine.
- iv. As the affected engines are subject to the Engine NESHAP:
 - A. At all times, the Permittee shall maintain and operate the affected engines and the associated control systems, in a manner consistent with good air pollution control practice for minimizing emissions.
 - B. The Permittee must develop and implement a written startup, shutdown and malfunction (SSM) plan for the affected engines including associated control systems in accordance with 40 CFR 63.6(e)(3).
- c. Prior to the effective compliance date for the affected engines under the Engine NESHAP, the Permittee may operate the affected engines without the affected systems, as may be necessary to facilitate shakedown and commissioning. During such period, the Permittee shall still operate in accordance with safety and good air pollution control practice as provided by 40 CFR 63.6605(b).

7.1.6 Production and Emission Limitations

The Permittee shall not exceed the following production and emission limits:

- a. Emissions from affected engines CC23 shall not exceed the following limits:

<u>Pollutant</u>	<u>(Tons/Year)</u>
NO _x	63.4

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 95120024, pursuant to PSD [T1].

- b. Emissions from affected engines EG2 shall not exceed the following limits:

<u>Pollutant</u>	<u>(Tons/Year)</u>
NO _x	39.0

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 95120024, pursuant to PSD [T1].

- c. i. Total fuel usage from the IC engines at the source combined shall not exceed 110,438 million Btu/month and 1,325,250 million Btu/year.
- ii. HAP emissions from the IC engines shall not exceed 55.23 lb/million scf of gas for formaldehyde and 139 lb/million scf for total HAPs.

- d. Total HAPs emissions from IC engines at the source shall not exceed the following limits:

<u>Pollutants</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Formaldehyde	1.0	8.8
Individual HAP Other Than Formaldehyde	1.0	3.0
Combination of HAPs	3.0	18.25

- e. Total HAPs emissions from all units (IC engines, dehydration units and storage tanks) at the source shall not exceed the following limits:

<u>Pollutants</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Formaldehyde	1.6	9.6
Individual HAP Other Than Formaldehyde	1.0	5.0
Combination of HAPs	4.0	20.0

- f. Compliance with monthly limits shall be determined on a block-monthly basis. Compliance with the above 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).
- g. The above limitations of Conditions 7.1.6(c), (d), and (e) contain revisions to previously issued Permit 03080054. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit,

consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically MSSCAM and/or PSD. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the revisions correct typographical errors in Permit 03080054. Based on the correct production limits of natural gas, the emissions of HAPs from the source have been lowered [T1R].

7.1.7 Testing Requirements

- a. i. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the engines in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the engine, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 8.6.2.
- ii. Upon written request by the Illinois EPA, such testing shall be conducted for specific affected engines(s) within 45 calendar days of the request or on such later date agreed upon by the Illinois EPA.
- b. The Permittee shall submit a written report for this testing within 30 days of the date of testing.
- c. i. For each affected lean-burn engine, within 180 days after the initial compliance date specified in 40 CFR 63.6595, the Permittee shall have applicable performance tests conducted as required by 40 CFR 63.6612(a) in accordance with the applicable requirements of Table 4 and 5 of the Engine NESHAP, including measurements of the CO and O₂ concentration at the inlet and outlet of the oxidation catalyst system.

- ii. For each affected rich-burn engine, within 180 days after the initial compliance date specified in 40 CFR 63.6595, the Permittee shall have applicable performance tests conducted as required by 40 CFR 63.6612(a) in accordance with the applicable requirements of Table 4 and 5 of the Engine NESHAP, including measurements of formaldehyde and O₂ concentrations and moisture content at the inlet and outlet of the NCR system.
- iii. Notwithstanding 5(a)(i) or (ii), as provided by 40 CFR 63.6612(b), the Permittee is not required to conduct an initial performance test for an affected engine for which a performance test has been previously conducted, if the following criteria are satisfied:
 - A. The test must have been conducted using the same methods specified in the Engine NESHAP and these methods must have been followed correctly.
 - B. The test must not be older than 2 years.
 - C. The test must be reviewed and accepted by Illinois EPA or the USEPA.
 - D. Either no process or equipment changes must have been made since the test was performed, or the Permittee must be able to demonstrate that the results of the performance test, with or without adjustments, reliably demonstrate compliance despite process or equipment changes.
- d. Pursuant to the 40 CFR 63.6615, following the initial performance tests for the affected engines, the Permittee shall perform each subsequent performance tests on the following time schedules in accordance with Table 3 of the Engine NESHAP.
 - i. For affected engines that are not "limited use" engines, the subsequent test shall be performed every 8760 hours of operation or 3 years, whichever occurs first.
 - ii. For affected engines that are "limited use" engines, the subsequent test shall be performed every 8760 hours of operation or 5 years, whichever occurs first.

Note: Pursuant to 40 CFR 63.6675, "limited use" means a stationary reciprocating internal combustion engine that operates less than 100 hours per year.

- e. Within 60 days of a written request from the Illinois EPA, or the date agreed upon by the Illinois EPA, whichever is later, the Permittee shall have emission tests for CO or formaldehyde, NO_x and VOM for affected engine(s) conducted, as specified in the request, by a qualified independent testing service.

7.1.8 Monitoring Requirements

- a. The operation and opacity of the affected engine shall be formally observed by operating personnel for the affected engine or a member of Permittee's environmental staff on a regular basis to assure that the affected engine is operating properly, which observations shall be made at least every six months.
- b. Pursuant to Section 39.5(7)(a) of the Act, a tune-up of the affected engines shall be performed annually or after 4,000 hours of operation.
- c. Pursuant to 40 CFR 63.6625(b) and the Engine NESHAP, Table 6, Item 10, the Permittee shall install, operate and maintain a continuous parameter monitoring system (CPMS) for each affected system for catalyst inlet temperature, including recording data on a 4-hour rolling average basis.
- d. Pursuant to the Engine NESHAP, Table 6, Item 10, the Permittee shall measure and record the pressure drop across each affected catalyst as least once per month.
- e. The periodic monitoring requirements sufficient to meet 39.5(7)(d)(ii) of the Act are addressed by the operational and production requirements in Condition 7.1.6 and the work practice requirement in Condition 7.1.5.

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected engines pursuant to Section 39.5(7)(b) of the Act:

- a. Engine rating for each affected engine, hp.
- b. Operating hours for each affected engine, hrs/mo and hrs/yr.
- c. Emissions of NO_x, SO₂, PM, CO, and VOM from each affected engines CC23 and EG2, ton/mo and ton/yr.
- d. Emissions of NO_x, SO₂, PM, CO, and VOM from the affected engines, ton/mo and ton/yr.

- e. The Permittee shall keep on file documentation that the natural gas fuel meets the definition of "pipeline natural gas" as described in 40 CFR 72.2.
- f. The Permittee shall maintain the following records to demonstrate good operating practices and procedures for the affected engines, including:
 - i. Records for semi-annual inspections of the affected engines with date and nature of the inspection.
- g. Logs for maintenance and tune up of the affected engines.
- h. Copies of the reports from Condition 7.1.7(a)
- i. The Permittee shall maintain all records required by the Engine NESHAP for each affected engine pursuant to 40 CFR 63.6655, as applicable, including:
 - i. Copy of each notification and report required by the Engine NESHAP.
 - ii. Records related to each malfunction of operation of the air pollution control and monitoring equipment.
 - iii. Records related to performance tests in accordance with 40 CFR 63.10(b)(2)(viii).
 - iv. Records related to maintenance performed on each affected system and monitoring equipment.
 - v. Records of any action taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including any corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
 - vi. Records described in 40 CFR 63.10(b)(2)(vi)-(xi) for each CPMS system.
- j. The Permittee shall maintain records of the following items for each affected engine:
 - i. A file containing:
 - A. The model number, model year and serial number of each engine.
 - B. Data for the maximum hourly emission rates for NO_x, CO, VOM, PM and individual HAP from the engine with the affected system (lbs/hour), with supporting documentation and calculations.

- C. A copy of the operation and maintenance procedures for the affected system recommended by the manufacturer.
- ii. Records of inspection, maintenance and repair logs with dates and the nature of such activities for the affected systems on each affected engine.
- iii. The following operating records:
 - A. Records of the pressure drop of each oxidation catalyst system, recorded at least once per operating month.
 - B. Records of the inlet temperature of each oxidation catalyst, recorded at least once per operating day.
- k. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- l. The Permittee shall keep on file documentation that the natural gas fuel meets the definition of "pipeline natural gas" as described in 40 CFR 72.2.

7.1.10 Reporting Requirements

- a. For the affected engines, the Permittee shall comply with the applicable notification and reporting requirements of the Engine NESHAP, including the requirements under 40 CFR 63.6645 and 63.6650.
- b. The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.
- c. Prompt Reporting
 - i. 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:

- A. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 8.6.1
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 8.6.1.
- 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.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set forth for the affected engines.

7.1.12 Compliance Procedures

- a. Compliance with Conditions 7.1.3 is demonstrated by the work practices of 7.1.5, testing of 7.1.7, monitoring of 7.1.8, recordkeeping and reporting requirements described in Subsection 7.1.
- b. Compliance with the emission limits in Conditions 5.6 and 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9
- c. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.2 TEG Dehydration Units

7.2.1 Description

These triethylene glycol (TEG) dehydration units are process emission units used primarily to separate products and remove contaminants from the natural gas.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Reboiler 4 (VV1)	TEG Dehydration Unit	Flare #1
Reboiler 5 (VV2)	TEG Dehydration Unit	Flare #1
Reboiler 6 (VV3)	TEG Dehydration Unit	Flare #2
Reboiler 7 (VV1-G)	TEG Dehydration Unit	Flare #1G
Reboiler 8 (VV2-G)	TEG Dehydration Unit	Flare #1G
Reboiler 9 (VV3-G)	TEG Dehydration Unit	Flare #2G
Reboiler 10 (VV4-G)	TEG Dehydration Unit	Flare #2G
Reboiler 1 (VV1-A)	TEG Dehydration Unit	Flare #1A
Reboiler 2 (VV2-A)	TEG Dehydration Unit	Flare #1A
Reboiler 3 (VV3-A)	TEG Dehydration Unit	Flare #2A

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected TEG dehydration units" for the purpose of these unit-specific conditions, are TEG dehydration units as described in Conditions 7.2.1 and 7.2.2.
- b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.
- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].
- d. 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 source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart G shall apply only to photochemically reactive material [35 IAC 215.301].
- e. Subject to the following terms and conditions, the Permittee is authorized to continue operation of the affected TEG dehydration units in violation of the applicable state standards in 35 IAC 215.301 in the event of a malfunction or breakdown of the affected units and applicable control practices. This authorization is

provided pursuant to 35 IAC 201.149, 201.261 and 201.262, as the Permittee has applied for such authorization in its application, generally explaining why such continued operation would be required to provide essential service or to prevent risk of injury to personnel or severe damage to equipment, and describing the measures that will be taken to minimize emissions from any malfunctions and breakdowns. This authorization supersedes the general prohibition in Condition 9.2.3 against continued operation in such circumstances.

- i. This authorization only allows such continued operation as necessary to provide essential service or to prevent risk of injury to personnel or severe damage to equipment and does not extend to continued operation solely for the economic benefit of the Permittee [35 IAC 201.262].
- ii. Upon occurrence of excess emissions due to malfunction or breakdown, the Permittee shall remove from service and repair the emission unit(s) so that any violation of the applicable requirements cease.
- iii. The Permittee shall fulfill the applicable recordkeeping and reporting requirements of Conditions 7.2.9(d) and 7.2.10(b), respectively. For these purposes, time shall be measured from the start of a particular incident. The absence of excess emissions for a short period shall not be considered to end the incident if excess emissions resume. In such circumstances, the incident shall be considered to continue until corrective actions are taken so that excess emissions cease or the Permittee takes the affected emission unit(s) out of service.
- iv. Following notification to the Illinois EPA of a malfunction or breakdown with excess emissions, the Permittee shall comply with all reasonable directives of the Illinois EPA with respect to such incident, pursuant to 35 IAC 201.263.
- v. This authorization does not relieve the Permittee from the continuing obligation to minimize excess emissions during malfunction or breakdown. As provided by 35 IAC 201.265, an authorization in a permit for continued operation with excess emissions during malfunction and breakdown does not shield the Permittee from enforcement for any such violation and only constitutes a prima facie defense to such an enforcement action provided that the Permittee has fully complied with all terms and conditions connected with such authorization.

7.2.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected TEG dehydration units not being subject to the requirements of 35 IAC 212.321 or 212.322, because due to the unique nature of these units, a process weight rate cannot be set so that such rules cannot reasonably be applied.
- b. The affected dehydration units are not subject to National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart HHH: Natural Gas Transmission and Storage Facilities, because the affected TEG dehydration units are located in an existing local distribution company that transmit and store natural gas.
- c. The affected TEG dehydration units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because they do not use an add-on control device to achieve compliance with any emission limitation or standard.
- d. The affected TEG dehydration units are not subject to NESHAP 40 CFR Part 63 Subpart JJJJJJ: Area Sources: Industrial/Commercial/Institutional Boilers because they do not combust solid fossil fuels, biomass, or liquid fuels.

7.2.5 Operational and Production Limits and Work Practices

- a. Pursuant to Section 39.5(7), pipeline quality natural gas shall be the only fuel fired in the flares.
- b. Pursuant to Section 39.5(7), at all times, the Permittee shall to the extent practicable, maintain and operate the flare, in a manner consistent with good air pollution control practice for minimizing emissions. For this purpose control efficiency of the flare shall achieve at least 85 percent [T1].
- c. Pursuant to Section 39.5(7)(a), the flares shall comply with 40 CFR 60.18.
- d. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the triethylene glycol dehydration units in a manner consistent with safety and good air pollution control practice for minimizing emissions.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected TEG dehydration units subject to the following:

- a. Emissions from the affected TEG dehydration units shall not exceed the following limits:

<u>Pollutant</u>	<u>(Tons/Year)</u>
VOM	39.0

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations are being established Permit 95120024 pursuant to Title I of the CAA 40 CFR 52.21, Prevention of Significant Deterioration (PSD) [T1]

7.2.7 Testing Requirements

None.

7.2.8 Monitoring Requirements

- a. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the triethylene glycol dehydration units in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the triethylene glycol dehydration unit(s), maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 8.6.2.
- b. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform calculations of emissions from the triethylene glycol dehydration units using GRI-GLYCalc™, version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual at least once every calendar year. Inputs to the model shall be representative of actual operating conditions of the triethylene glycol dehydration units and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1).
- c. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform quarterly inspections per

manufacturer's instructions of the triethylene glycol dehydration units when the unit is in operation.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected TEG dehydration units to demonstrate compliance with Conditions 5.6.1 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Emissions of VOM from the affected TEG dehydration units including parameters used and pertinent supporting data as described in Condition 7.2.12, ton/mo and ton/yr.
- b. Maximum design capacity of the flare, mmBtu/hr.
- c. Log of maintenance of the flare, which demonstrate proper operation as required in Condition 7.2.5.
- d. Pursuant to Section 39.5(7)(b) of the Act and 35 IAC 201.263, the source shall maintain records of continued operation in violation of the applicable requirements during malfunction or breakdown shall include at a minimum:
 - i. Malfunction breakdown procedures that include the following at a minimum:
 - A. Estimates of typical emissions during malfunction or breakdown.
 - B. Reasonable steps that will be taken to minimize emissions, duration, and frequency of malfunction or breakdown.
 - ii. Date and duration of the malfunction or breakdown.
 - iii. A detailed explanation of the malfunction or breakdown.
 - iv. An explanation why the emission unit(s) continued operation.
 - v. The measures used to reduce the quantity of emissions and the duration of the event.
 - vi. The steps taken to prevent similar malfunctions or breakdowns and reduce their frequency and severity.
 - vii. An explanation of whether emissions during malfunction or breakdown were above typical emissions in the malfunction or breakdown procedures and whether emissions exceeded any applicable requirements.

- e. The Permittee shall keep on file documentation that the natural gas fuel meets the definition of "pipeline natural gas" as described in 40 CFR 72.2.
- f. The Permittee shall maintain the following records to demonstrate good operating practices and procedures for the affected TEG dehydration units, including:
 - i. Pursuant to Section 39.5(7)(b) of the Act and Condition 7.2.8(c), the Permittee shall keep records of inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date inspections were performed, identification of equipment being inspected, and a description of any maintenance and repair activities that resulted in a modification or reconstruction of the piece of equipment as described in Condition 7.2.8(c).
 - ii. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each calculation of emissions performed. These records shall include, at a minimum: date the calculations were performed, the input parameters used, and the emissions from the triethylene glycol dehydration units with supporting documentation.
 - iii. Hours of operation of the triethylene glycol dehydration units, hr/month and hr/year.
- g. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
 - i. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9 if such a test is required by Condition 7.2.8.

7.2.10 REPORTING REQUIREMENTS

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. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 8.6.1.
 - ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 8.6.1.
 - 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.** Pursuant to Sections 39.5(7)(b) and (f) of the Act and 35 IAC 201.263, the source shall provide the following notification and reports to the IEPA, Compliance Section and Regional Field Office concerning continued operation in violation of the applicable requirements during malfunction or breakdown:
- i. Prompt Reporting

When continued operation for more than one hour of the affected TEG dehydration units in violation of the applicable requirements during malfunction or breakdown:

 - A. The source shall notify the IEPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunction or breakdown.
 - B. Upon achievement of compliance, the source shall give a written follow-up notice within 15 days to the IEPA, Air Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation was necessary, the length of time during which operation continued under such conditions, the measures taken by the source to minimize and correct deficiencies with chronology, and when the repairs were

completed or when the unit(s) was taken out of service.

- C. If compliance is not achieved within 5 working days of the occurrence, the source shall submit interim status reports to the IEPA, Air Compliance Section and Regional Field Office, within 5 days of the occurrence and every 14 days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete or the emission unit(s) will be taken out of service.

ii. Semiannual Reporting

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

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

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with Conditions 7.2.3(c) and (d) is demonstrated by proper operating conditions of the affected TEG dehydration units.
- b. Compliance with the emission limits in Conditions 5.5 and 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

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

7.3 Storage Tanks

7.3.1 Description

Two methanol storage tanks (each 12,000 gallons) and one gasoline storage tank (2,000 gallons) are located at the facility for onsite use. All three tanks are equipped with submerged filling.

Note: This narrative description is for informational purposes only and is not enforceable.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Underground Gasoline Storage Tank	2,000 Gallon Gasoline Storage Tank	Submerged Loading Pipe
Methanol1	12,000 gallon methanol storage tank	Submerged Loading Pipe
Methanol2	12,000 gallon methanol storage tank	Submerged Loading Pipe

7.3.3 Applicable Provisions and Regulations

- a. The "affected tanks" for the purpose of these unit-specific conditions, are the tanks described in Conditions 7.3.1 and 7.3.2.
- b. Pursuant to 35 IAC 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or submerged fill.
- c. Pursuant to 35 IAC 215.583(a) & (b), no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing facility unless the gasoline storage tank is equipped with a submerged loading pipe.

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected 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 Kb, because the affected storage tanks do not utilize storage vessels with a capacity greater than or equal to 75 cubic meters (m³) (19812.9 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or

modification is commenced after July 23, 1984, pursuant to 40 CFR 60.110(b)(a).

- b. i. The affected tanks are not subject to 35 IAC 215.121, because the affected tanks do not utilize any stationary tank, reservoir or other container of more than 151 cubic meters (40,000 gal) capacity, pursuant to 215.121(a).
- ii. The affected storage tanks are not subject to 35 IAC 215.122(a), because the affected storage tanks do not have a through-put of greater than 151 cubic meters per day (40,000 gal/day) into any railroad tank car, tank truck or trailer, pursuant to 35 IAC 215.122(a).
- c. The affected tanks are not subject to 35 IAC 215.583(a)(2), 215.583(c), and 215.283(d), pursuant to 35 IAC 215.583(b)(4), because the tank is located in an attainment area.
- d. The affected tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.
- e. The affected tanks are not subject to 35 IAC 215.301, because the tanks do not use organic material that would make them subject to 35 IAC 215.301

7.3.5 Control Requirements and Work Practices

- a. The affected gasoline storage tank shall only be used for the storage and dispensing of gasoline.
- b. The affected methanol storage tanks shall only be used for the storage of methanol.

7.3.6 Production and Emission Limitations

Production and emission limitations are not set for the affected tanks.

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform annual inspections of the affected tanks and associated auxiliary equipment and check their ability to

comply with the applicable equipment requirements of condition 7.3.3 (b) & (c).

7.3.9 Recordkeeping Requirements

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

- a. Information for the affected storage tanks showing the presence of a permanent submerged loading pipe.
- b. Maintenance and repair records for the affected storage tanks, specifically as related to the repair or replacement of the loading pipe.
- c. The throughput of the affected tank, gal/mo and gal/yr;

7.3.10 Reporting Requirements

Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected storage tanks with the permit requirements specified in Conditions 7.3.3 and 7.3.5 within 30 days of such occurrence as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected storage tanks.

7.3.12 Compliance Procedures

For the affected storage tanks, compliance with the applicable standards of Condition 7.3.3 is addressed by the work practices, testing, monitoring, recordkeeping and reporting requirements described in Section 7.3 of this permit.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after March 22, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

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

- a. The changes do not violate applicable requirements;

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

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the

Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

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

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234
 - iii. Illinois EPA - Air Permit Section (MC 11)

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

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

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for

determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions

that exceeded the emission limitations, standards, or regulations in this permit.

- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.2 Attachment 2 Emissions of Particulate Matter from Process Emission Units

- a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].
- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

where:

P = Process weight rate; and
 E = Allowable emission rate; and,

A. Up to process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

B. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

iii. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>T/hr</u>	<u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

$$E = C + A(P)^B$$

where:

P = Process weight rate; and
E = Allowable emission rate; and,

A. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

B. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

iii. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

10.3 Attachment 3 - Guidance on Revising This Permit

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

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

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

1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

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

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

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

3. Significant Permit Modification

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

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

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

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

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

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

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

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

10.4 Guidance on Renewing This Permit

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

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

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

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

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

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

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

Mail renewal applications to:

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

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