

217/785-1705

CONSTRUCTION PERMIT
NSPS -- NESHAP SOURCE

PERMITTEE

The University of Illinois Board of Trustees
Attn: David Wilcoxon
506 South Wright Street
Urbana, Illinois 61801

Application No.: 13120041

I.D. No.: 019010ADA

Applicant's Designation: New Boilers

Date Received: December 30, 2013

Date Issued:

Subject: Three Natural Gas/Oil-Fired Boilers

Location: Abbott Power Plant, 1117 South Oak Street, Champaign

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission units and air pollution control equipment consisting of three natural gas- and distillate oil-fired boilers, as described in the above referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s).

If you have any questions on this permit, please call Bob Smet at 217/785-1705.

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

Date Signed: _____

REP:RPS:psj

Attachments

cc: FOS - Region 3, Illinois EPA

Part 1: Project-Wide Conditions

1.1. Effect of Permit

- a. This permit does not relieve the Permittee of the responsibility to comply with all local, state and federal regulations that are part of the applicable Illinois' State Implementation Plan, as well as all other applicable federal, state and local requirements.
- b. In particular, this permit does not relieve the Permittee from the responsibility to carry out practices during the construction of this project, such as application of water or dust suppressant sprays to roadways, as necessary to minimize fugitive dust and prevent an air pollution nuisance from fugitive dust, as prohibited by 35 IAC 201.141.

1.2. Validity of Permit

- a. As provided by 40 CFR 52.21(r)(2):
 - i. For the first new boiler ("new Boiler 3"), unless the Illinois EPA issues an extension upon a satisfactory showing that an extension is justified, this permit shall become invalid if construction of this boiler is not commenced within 12 months after this permit becomes effective, if construction is discontinued for a period of 12 months or more, or if construction is not completed within a reasonable period of time.
 - ii. For the second and third new boilers ("new Boiler 1" and "new Boiler 2"), unless the Illinois EPA issues an extension upon a satisfactory showing that an extension is justified, this permit shall become invalid if construction of the second and third new boilers are not commenced within 12 months after completion of the construction of the first new boiler, or if construction of the second and third boiler is discontinued for a period of 12 months or more, or if construction of this second boiler is not completed within a reasonable period of time.
 - iii. These conditions supersede Standard Condition 1.
- b. For purposes of the above provisions, the definitions of "construction" and "commence" at 40 CFR 52.21 (b)(8) and (9) shall apply, which requires that a source must enter into a binding agreement for on-site construction or begin actual on-site construction. (See also the definition of "begin actual construction," 40 CFR 52.21 (b)(11).)

1.3. Requirements for Existing Boilers 2, 3 And 4

- a. Requirements for Existing Boilers 3 and 4

Prior to beginning construction of the first new boiler, the Permittee shall permanently shutdown existing Boilers 3 and 4.

b. Requirements for Existing Boiler 2

Prior to beginning construction of the second and third new boilers, the Permittee shall permanently shut down existing Boiler 2.

1.4. Good Air Pollution Control Practice

The Permittee shall operate and maintain the affected boilers including associated air pollution control equipment, in a manner consistent with good air pollution control practice, as follows:

- a. At all times, including periods of startup, shutdown, malfunction or breakdown, operate as practicable to minimize emissions.
- b. Conduct routine inspections and perform appropriate maintenance and repairs to facilitate proper functioning of equipment and minimize or prevent malfunctions and breakdowns.
- c. Install, calibrate and maintain required monitoring devices and instrumentation in accordance with good monitoring practices, following the manufacturer's recommended operating and maintenance procedures or such other procedures as otherwise necessary to assure reliable operation of such devices.

1.5. Compliance with Emission Standards And Emission Limits

- a. The emission limits set by this permit apply at all times unless otherwise specified in a particular provision.
- b.
 - i. Unless otherwise provided by applicable rules, emission standards for particulate matter (PM) under applicable regulations that are referenced in the conditions of this permit address only filterable particulate, as would be measured by USEPA Method 5 or other appropriate USEPA Test Methods.
 - ii. Unless otherwise provided by applicable provisions of this permit, emissions limits for PM₁₀ set by this permit address both filterable and condensable particulate. These emission limits for PM₁₀ also serve to address emissions of PM_{2.5}.
- c. When performance or emission testing is conducted, compliance with hourly limits set by this permit shall be determined from the average of the test results, commonly three runs, each nominally one hour in duration.
- d. During periods of operation other than performance testing, compliance with the emission limits set by this permit shall be determined from operating information for emission units, including information for both the amount of material processed and the operational condition of

the units and their control devices, and from appropriate values for emission rates or emission factors that do not understate actual emissions of the units as they were actually operated. For this purpose, for emission units for which performance testing has been conducted, values for emission rates or emissions factors developed from the most recent testing for an emission unit shall be used unless it is determined that this would understate actual emissions of the unit, either as a general matter or for a particular period of operation, in which case alternative rates or factors shall be developed and used consistent with the principles of credible evidence.

- e. i. Except as provided below or unless otherwise specified in a particular provision, compliance with annual limits established by this permit shall be determined from a rolling total of 12 months of data, i.e., from the sum of the data for the current month and data for the preceding 11 months (12 month total), and shall consider all emissions, including emissions during startup, shutdown, and malfunction and breakdown.
- ii. For the first year (12 months) of operation, compliance shall be determined for a cumulative total of monthly data, i.e. from the sum of the data for the current month and data for all preceding months.

1.6. Records for Monitoring Systems And Instrumentation

- a. The Permittee shall keep records of the data measured by required monitoring systems and instrumentation. Unless otherwise provided in a particular condition of this permit, the following requirements shall apply to such recordkeeping:
 - i. For required monitoring systems, data shall be automatically recorded by a central data system, dedicated data logging system, chart recorder or other data recording device. If an electronic data logging system is used, the recorded data shall be the hourly average value of the particular parameter for each hour. During periods when the automatic recording device is out of service, data shall be recorded at least once per shift for periods when the associated emission unit(s) is in service.
 - ii. For required instrumentation, the measured data shall be recorded manually at least once per day, unless otherwise specified, with data and time both recorded, for periods when the associated emission unit(s) are in service, provided however that if data from an instrument is recorded automatically, the above provisions for recording of data from monitoring systems shall apply and manual recording of data is not required.
- b. The Permittee shall keep records for the operation, calibration maintenance and repair of required monitoring systems and instrumentation. These operating records shall, at a minimum,

identify the date and duration of any time when a required monitoring instrument or device was not in operation, with explanation; the performance of manual quality control and quality assurance procedures for the system; and maintenance and repair activities performed for the system.

- c. The Permittee shall maintain a file containing a copy of the specifications for each required monitoring device or instrument and the recommended operating and maintenance procedures for the device as provided by its manufacturer.

1.7: Records for Opacity Measurements

- a. The Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9 for emission units at the affected facility that it conducts or that are conducted on its behalf by individuals who are qualified to make such observations. For each occasion on which such measurements are made, these records shall include the formal report for the measurements if conducted pursuant to this permit or a request from the Illinois EPA, or otherwise the identity of the observer, a description of the measurements that were made, the operating condition of the affected operations, the observed opacity, and copies of the raw data sheets for the measurements.

CONDITION 1.8: RETENTION AND AVAILABILITY OF RECORDS

- a. In response to an Illinois EPA or USEPA request for records, during the course of an inspection of the affected boilers, the Permittee shall provide the following information to the Illinois EPA or USEPA or make such information available for copying:
 - i. Copies of written records kept at the facility during the inspection.
 - ii. Copies of any records retained in an electronic format that are accessible at the facility.
- b. Where a condition requires that a file be kept containing certain information, the file shall be updated as needed to keep the information current. Each new version or update shall be marked with the date that it was prepared and shall become effective on that date unless a later "effective date" is also specified.
- c. The Permittee shall retain all records and logs required by this permit for at least five years from the date of entry (unless a longer retention period is specified by a particular provision), keep the records at a location at the affected facility that is readily accessible to the Illinois EPA and USEPA, and make records available for inspection and copying by the Illinois EPA or USEPA upon request.

CONDITION 1.9: ADDRESSES FOR THE ILLINOIS EPA

- a. Reports and notifications required by this permit shall be sent to the Illinois EPA at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance and Enforcement Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

Telephone: 217/782-5811 Fax: 217/524-4710

- b. A copy of all required reports and notifications, except the Annual Emission Report required by 35 IAC Part 254, shall also be sent to the Illinois EPA Air Regional Field Office at the following address:

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

Telephone: 618/346-5120 Fax: 618/346-5155

CONDITION 1.10: AUTHORIZATION TO OPERATE EMISSION UNITS

- a. Under this permit, each boiler may be operated for a period that ends one year (365 days) after initial startup to allow for equipment shakedown and required emissions testing. This period may be extended by Illinois EPA upon request of the Permittee if additional time is needed to complete shakedown or perform emission testing.
- b. Upon successful completion of required emission testing, the Permittee may continue to operate emission units at the affected facility as allowed by Section 39.5(5) of the Environmental Protection Act.
- c. These conditions supersede Standard Condition 6.

CONDITION 1.11: STANDARD CONDITIONS

Standard conditions for issuance of construction permits, attached hereto, shall apply to this project, unless specifically superseded by other conditions in the permit. (Refer to Attachment 3.)

PART 2.1: UNIT-SPECIFIC CONDITIONS FOR THE BOILERS

2.1.1 Introduction

The three new boilers (the affected boilers) will fire natural gas as their primary fuel and distillate oil as a secondary fuel. The construction of the new boilers will be conducted in separate stages, with the second and third boiler being constructed after the first. The new boilers will replace three existing natural gas- and distillate oil-fired boilers.

2.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit I.D.	Description	Control Measures
Boilers	Three 242.38 mmBtu/hr Natural Gas-Fired Boilers, with Distillate Oil Backup	Low-NOx Combustion

2.1.3-1 Applicable Federal Emission Standards

- a. i. The affected boilers are subject to the federal New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Db (Boiler NSPS), and related requirements of the General Provisions of the NSPS, 40 CFR 60 Subpart A.
- ii. A. Pursuant to the NSPS, 40 CFR 60.44b(a)(1)(ii), as high heat release rate boilers, the NOx emissions of the affected boilers shall not exceed 86 ng/J (0.20 lb/million Btu) heat input on a 30-day rolling average basis, beginning on and after the date on which the initial performance test is completed or is required to be completed under 40 CFR 60.8, whichever date comes first.
- B. As provided by 40 CFR 60.46b(e)(4), unless alternative monitoring is approved by USEPA pursuant to 40 CFR 60.13(i), during periods when performance tests are not being conducted, NOx emissions data collected by monitoring pursuant to 40 CFR 60.48b(g)(1) or (g)(2) shall be used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but not used to determine compliance with this NOx emission standard. A new 30-day rolling average emission rate must be calculated each boiler operating day as the average of all of the hourly NOx emission data from the preceding 30 boiler operating days.

- iii. A. Pursuant to the NSPS, 40 CFR 60.43b(f), when oil or oil in combination with natural gas is fired in the affected boilers, opacity from the affected boilers shall not be greater than 20 percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. An owner or operator of an affected facility that elects to install, calibrate, maintain, and operate a continuous emissions monitoring system (CEMS) for measuring PM emissions according to the requirements of 40 CFR 60 subpart Db and is subject to a federally enforceable PM limit of 0.030 lb/mmBtu or less is exempt from this opacity standard.
- B. As provided by 40 CFR 60.43b(g), this limit applies at all times except during periods of startup, shutdown, or malfunction. However, exceedances during such periods shall be reported as deviations.
- b. i. The affected boilers are affected facilities under the federal National Emission Standard for Hazardous Air Pollutant (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 Subpart JJJJJJ. For each affected boiler, the Permittee must comply with all applicable requirements of this NESHAP, including the following. The Permittee must also comply with applicable requirements of 40 CFR 63 Subpart A, General Provisions, (see 40 CFR 63.11235 and Table 8 of 40 CFR 63 Subpart JJJJJJ for specific applicable general provisions).
- ii. Pursuant to 40 CFR 63.11210(f) and Table 2 of the NESHAP, the Permittee shall complete tune-ups for each affected boiler every five years, as specified in 40 CFR 63.11223 beginning no later than 61 months after the initial startup of the affected boiler.
- iii. Pursuant to 40 CFR 63.11205(a), at all times the Permittee must operate and maintain the affected boilers, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require further efforts to reduce emissions if levels required by this standard have been achieved.

2.1.3-2 Applicable State Emission Standards

- a. Pursuant to 35 IAC 212.123(a), the emissions of smoke or other particulate matter from each affected boiler shall not have an opacity greater than 30 percent, except as provided in 35 IAC 212.123(b).

- b. When an affected boiler is fired on distillate oil, it is subject to 35 IAC 212.206, which provides that the emissions of particulate matter (PM) from the affected boilers due to firing of oil shall not exceed 0.10 lb per mmBtu of actual heat input.
- c. When an affected boiler is fired on distillate oil, it is subject to 35 IAC 214.122(b)(2), which provides that the emissions of sulfur dioxide (SO₂) from the affected boilers due to firing of oil shall not exceed 0.30 lb of SO₂ per mmBtu of actual heat input.
- d.
 - i. Pursuant to 35 IAC 216.121, the emission of CO from the affected boilers shall not exceed 200 ppm, corrected to 50 percent excess air.
 - ii. Malfunction and Breakdown Provisions

In the event of a malfunction or breakdown of an affected boiler, the Permittee is authorized to continue operation of the affected boiler in violation of the applicable state emission standards in Condition 2.1.3-2(d) (35 IAC 216.121). This authorization is made pursuant to 35 IAC 201.262 and is subject to the following requirements:

- A. This authorization only allows such continued operation as necessary to prevent risk of injury to personnel or severe damage to equipment, provided however, that operation shall not continue solely for the economic benefit of the owner or operator of the plant. As provided by 35 IAC 201.265, this authorization does not shield the Permittee from enforcement for any such violation and shall only constitute a prima facie defense to such an enforcement action.
- B. Upon occurrence of excess emissions due to malfunction or breakdown, the Permittee shall as soon as practicable, repair the affected boiler or remove the affected boiler from service, so that excess emissions cease unless shutting down the affected boiler would lead to a greater amount of emissions during subsequent startup than would be caused by continuing to run the affected boiler for a short period until repairs can be made.
- C. The Permittee shall fulfill applicable recordkeeping and reporting requirements of Conditions 2.1.9(d) and 2.1.10(b) with respect to malfunctions and breakdowns.

- D. Following notification to the Illinois EPA of a malfunction or breakdown that resulted in 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.

Note: These provisions are subject to review and revision when the CAAPP permit for the source is revised to address the affected boilers and each time the CAAPP permit is subsequently renewed.

iii. Startup

- A. The Permittee is authorized to operate an affected boiler in violation of the applicable state emission standards in Conditions 2.1.3-2(d) (35 IAC 216.121) during startup, pursuant to 35 IAC 201.262.
- B. The Permittee shall conduct startup of an affected boiler in accordance with the manufacturer's written instructions or other written instructions prepared by the Permittee and maintained on site that are specifically developed to minimize excess emissions from startups and that include, at a minimum, the following measures;
 - 1. Review of the operational condition of an affected boiler prior to initiating startup of an affected boiler; and
 - 2. Review of the operational parameters of the affected boiler during each startup as necessary to make appropriate adjustments to the startup to reduce or eliminate excess emissions.
- C. The Permittee shall fulfill applicable recordkeeping requirements of Condition 2.1.9(e).

Note: These provisions are subject to review and revision when the CAAPP permit for the source is revised to address the affected boilers and each time the CAAPP Permit is subsequently renewed.

2.1.4 Non-Applicability Provisions

- a. i. This permit is issued based on the affected boilers not being subject to the SO₂ emission standards and SO₂ continuous emissions monitoring requirements of the NSPS, 40 CFR 60.42b and 60.47b(a). This is because very low sulfur oil (as defined in 40 CFR 60.41b) and gaseous fuel

is being fired in the affected boilers so these requirements do not apply pursuant to 40 CFR 42b(k)(2) and 60.47b(f).

- ii. Pursuant to 40 CFR 60.45b(j), the owner or operator of an affected facility that only combusts very low sulfur oil, natural gas, or a mixture of these fuels is not subject to the compliance and performance testing requirements of 40 CFR 60.45b if the owner or operator obtains fuel receipts as described in 40 CFR 60.49b(r).
 - iii. This permit is issued based on the affected boilers not being subject to the PM emission standard of the NSPS, 40 CFR 60.43b(h)(1). This is because the fuel oil combusted in the affected boilers will contain less than 0.3 percent sulfur by weight so this standard does not apply pursuant to 40 CFR 60.43b(h)(5).
 - iv. This permit is issued based on the affected boilers not being subject to requirements for continuous opacity monitoring system (COMS) under the NSPS, 40 CFR 60.48b(a). This is because the fuel meets the criteria under 40 CFR 60.48b(j)(2), i.e., the affected boilers burn only liquid (excluding residual oil) or gaseous fuels with potential SO₂ emissions rates of 26 ng/J (0.060 lb/mmBtu) or less and does not use a post-combustion technology to reduce SO₂ or PM emissions. The Permittee must maintain fuel records of the sulfur content of the fuels burned, as described under 40 CFR 60.49b(r).
- b.
- i. This permit is issued based on the affected boilers not being subject to the PM emission limit of the NESHAP pursuant to 40 CFR 63.11210(e). In particular, the affected boilers combust only oil that contains no more than 0.50 weight percent sulfur or a mixture of 0.50 weight percent sulfur with a fuel not subject to a PM limit under this NESHAP and do not use post-combustion technology to reduce SO₂ or PM emissions, and the Permittee must monitor and keep records on a monthly basis of the type of fuel combusted.
 - ii. This permit is issued based on tune-ups only being required every five years under the NESHAP pursuant to 40 CFR 63.11201 because oxygen trim systems, as defined by 40 CFR 63.11237, must be used to maintain an optimum air-to-fuel ratio.
- c. The affected boilers are not subject to the provisions of Title IV of the federal Clean Air Act (Acid Program) because the affected boilers do not qualify as a utility unit or an electrical generating unit for the purpose of these provisions.

- d. This permit is issued based on the affected boilers not being subject to the requirements of 35 IAC 217 Subpart U, pursuant to 35 IAC 217.454(a). This is because the maximum design heat inputs of the affected boilers are each less than 250 mmBtu/hour.

2.1.5 Operational Limits

- a. The nominal rated heat input capacity of each affected boiler shall not exceed 243 mmBtu/hour for natural gas and 229 mmBtu/hour for oil.
- b. Natural gas and low-sulfur oil shall be the only fuels fired in the affected boilers.
- c. The annual usages of fuel by the affected boilers, combined, shall not exceed the following limits:
 - i. Natural gas: 4,005 million scf/year.
 - ii. Oil: 200,000 gallons/year.
- d. i. The sulfur content of the fuel oil burned in the affected boilers shall not be greater than 0.3 percent by weight (30-day rolling average).

Note: This limit is established pursuant to 40 CFR 60.42b(k)(2) to exempt the affected boilers from the SO₂ emissions limit set in 40 CFR 60.42b(k)(1) because the distillate oil will meet the NSPS definition of "low sulfur oil."

- ii. Pursuant to 40 CFR 60.45b(j), compliance with the SO₂ emission limit or the fuel oil sulfur limit may be determined based on a certification from the fuel supplier as provided by 40 CFR 60.49b(r)(1).

2.1.6 Emission Limits

- a. The emissions of the affected boilers shall not exceed the following limits. The hourly NO_x limit shall apply as a 30-day rolling average basis, using the methodology of the NSPS. For pollutants other than for NO_x, hourly limits shall apply as a three hour average or based on the results of stack tests (average of two or three test runs, each nominally one-hour duration).

Pollutant	Emission Limits			Combined Total Tons/Year
	Individual Boiler			
	lb/hour		lb/mmBtu	
	Gas	Oil		

NOx	9.70	16.0	0.0409	82.7
CO	9.70	18.28	-	82.8
PM ¹	0.46	3.26	-	4.1
PM ₁₀ ² /PM _{2.5} ²	0.58	3.89	-	5.1
VOM	1.21	1.14	-	10.3
SO ₂	0.14	69.54	-	5.5

¹ PM only includes filterable particulate as measured by USEPA Method 5 or other appropriate USEPA Method for PM.

² PM₁₀ and PM_{2.5} include both filterable and condensable particulate.

b. Notwithstanding the above:

- i. If an affected boiler fires oil during gas curtailments and/or gas supply interruptions for more than 8 hours during a 30-day rolling period, the average NOx emissions of the boiler during the gas curtailments and/or interruptions shall not exceed 0.070 lb/mmBtu and the emissions during such gas curtailments and/or interruptions shall not be considered in determining compliance with the NOx limit in Condition 2.1.6(a) (i) (i.e., 0.0409 lb/mmBtu), during such 30-day period.
- ii. If an affected boiler combusts gas and oil at the same time, emissions of pollutants other than NOx shall not exceed an hourly limit (E) that is calculated from the amount of each fuel that is burned, as follows:

$$E = F_g \times L_g + F_o \times L_o$$

where:

E = Alternative limit, in pounds/hour;

F_g and F_o are the fractions of the heat input to the boiler from gas and oil, respectively, where F_g + F_o = 1;

L_g and L_o are the hourly limits for gas and oil, respectively.

2.1.7-1 Requirements for Performance Testing

- a. i. Pursuant to 40 CFR 60.8 and 60.46b(c) and (e), for each affected boiler for emissions of NOx, the Permittee shall comply with the applicable requirements of the NSPS for performance testing using the continuous system for monitoring NO_x under 40 CFR 60.48b:
 - A. Pursuant to 40 CFR 60.46b(e)(1), for the initial test required by 40 CFR 60.8, NOx from the boiler

shall be monitored for 30 successive boiler operating days and the 30-day average emission rate is used to determine compliance with the NOx emission standard under the NSPS, 60 CFR 60.44b. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period.

- B. Pursuant to 40 CFR 60.46b(e)(4), following the date on which the initial test under 40 CFR 60.8 is completed, the Permittee shall upon request from the Illinois EPA or USEPA determine compliance with the NOx standard in 40 CFR 60.44b through the use of a 30-day performance test.
- ii. For the purpose of this performance testing, a predictive emission monitoring system (PEMS) that has been shown by the Permittee to meet the requirements of 40 CFR 60 Subpart A and Appendix B, Performance Specification 16 is considered to be a continuous system for monitoring NOx under 40 CFR 60.48b if either: 1) The requirements of Condition 2.1.8-2 of this permit are fulfilled; 2) The use of such PEMS is approved by the Illinois EPA in a new or revised permit pursuant to 40 CFR 60.48b(g)(2) and 60.49b(c); or 3) The use of such PEMS is approved by the USEPA pursuant to 40 CFR 60.13(i).

2.1.7-2 Requirements for Emission Testing

- a. i. A. Within one year after beginning routine operation of the first affected boiler, the Permittee shall have emission tests conducted for the boiler for emissions of CO, VOM, PM, PM₁₀ and PM_{2.5}, as specified below, at its expense by a qualified testing service while the boiler is firing natural gas and operating in the maximum load range and other representative operating conditions.
- B. Notwithstanding the above, testing for CO is not required if the affected boilers are equipped with instrumentation for CO that can be used to provide emission data for the boilers in pounds/hour and ppm at 50 percent excess air.
- ii. In addition to the testing required above, the Permittee shall have emission testing performed for the affected boiler(s) CO, VOM, PM₁₀ and/or PM_{2.5}, as specified by the Illinois EPA in the request, within 90 days of a written request by the Illinois EPA or such later date agreed to by the Illinois EPA.

- b. i. Applicable USEPA test methods and procedures shall be used for testing emissions of the affected boilers, including the following methods unless another method is approved by the Illinois EPA.

Carbon Monoxide*	Method 10
Volatile Organic Material	Method 18, 25 and/or 25A
PM	Method 5 or 5I
PM ₁₀ /PM _{2.5} (filterable)	Method 201A or Method 5**
PM ₁₀ /PM _{2.5} (condensable)	Method 202 or Method 5***

* Testing for CO is not required if the affected boilers are equipped with instrumentation for CO that can be used to provide emission data for the boilers in pounds/hour and ppmv at 50 percent excess air.

** Testing may be conducted using USEPA Method 5 if the Permittee reports all PM emissions measured by this method as filterable PM₁₀ and PM_{2.5}, in which case testing using USEPA Method 201A need not be performed.

*** Testing may be conducted using USEPA Method 5 if the Permittee reports all particulate material collected in the back half of the sampling train with this method as condensable particulate, in which case testing using Method 202 need not be performed.

- ii. If visible emissions are normally present during the operation of the affected boilers, the Permittee shall have observations of the opacity of the emissions of the affected boilers conducted in accordance with USEPA Method 9 during this emission testing.
- c. The Permittee shall submit a test plan to the Illinois EPA at least 60 days prior to this testing.
- d. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification for the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.
- e. The Final Report for these tests shall be promptly submitted to the Illinois EPA and in no case later than 60 days after the completion of the testing, and shall include as a minimum:

- i. A summary of results that includes measured emission rates, emission rates in the terms of the applicable limits (e.g., lbs/hour and lbs/mmBtu), and whether compliance was demonstrated with applicable limits.
 - ii. Description of test methods and procedures used, including description of sampling train, analysis equipment, and test schedule.
 - iii. Detailed description of operating conditions during the period of testing, including operating parameters of the boilers (e.g., heat input, and oxygen content in the flue gas leaving the boilers).
 - iv. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - v. Monitored emissions of NOx during the period of testing.
 - vi. Opacity data if opacity observations were conducted during the period of testing.
- f. Copies of emission test reports shall be retained for at least five years after the date that an emission test is superseded by a more recent test.

2.1.7-3 Requirements for Opacity Observations

- a. Pursuant to 40 CFR 60.11 and 60.46b(d), to determine compliance with the opacity limit in 40 CFR 60.43b, the Permittee shall have an initial performance test conducted for each affected boiler as required under 40 CFR 60.8, and shall conduct subsequent performance tests as requested by the Illinois EPA, using the applicable procedures and methods specified in 40 CFR 60.46b(d).
- b. The Permittee shall submit a written report for these observations which report shall be submitted within 30 days of the date of observations. This report shall include:
 - i. Date and time of observations.
 - ii. Name and employer of qualified observer.
 - iii. Copy of current Method 9 certification.
 - iv. Description of weather observation conditions during observations.
 - v. Description of the operating conditions of the boilers.

- vi. Raw data.
- vii. Opacity determinations.
- viii. Conclusions.

2.1.8-1 Requirements for Operational Monitoring

- a. For each affected boiler, the Permittee shall install, operate, and maintain monitors to measure and record fuel consumption.
- b. For each affected boiler, the Permittee shall install, operate, and maintain monitor(s) to measure and record steam output.

2.1.8-2 Requirements for Monitoring of NOx Emissions

- a. For the affected boiler, the Permittee shall conduct continuous monitoring for emissions of NOx using one of the following systems:
 - i. Option 1: A Continuous Emissions Monitoring System (CEMS).
 - ii. Option 2: A Predictive Emission Monitoring System (PEMS) as further addressed by Conditions 2.1.8-2(c).
 - iii. Option 3: A Predictive Emission Monitoring System (PEMS) that has been approved by USEPA pursuant to 40 CFR 60.13(i).

Note: This permit does not address monitoring for NOx in accordance with an operational monitoring plan that does not involve a PEMS. This is because monitoring for NOx must be conducted with either a CEMS or PEMS.

- b. The Permittee shall fulfill applicable requirements of the NSPS for this continuous monitoring system, including the following unless alternative requirements are approved by USEPA pursuant to 40 CFR 60.13(i). For this purpose, pursuant to 40 CFR 60.13(b), the continuous monitoring system shall be installed and operational prior to conducting the initial performance test for NOx under 40 CFR 60.8. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the monitoring devices.
 - i. Applicable notification requirements, including 40 CFR 60.7(a)(5), 60.8(d) and 60.49b(b).

- ii. Applicable operational requirements, including 40 CFR 60.13(e) and 60.48b(c), which provides that a continuous monitoring system shall be operated during all periods of operation of an affected facility except for continuous monitoring system breakdowns and repairs. Data is to be recorded during calibration checks, and zero and span adjustment.
 - iii. Applicable recordkeeping requirements, including 40 CFR 60.49b(g).
 - iv. Applicable reporting requirements, including 40 CFR 60.7(c), (d) and/or (e) and 60.49b(h).
- c. The Permittee may conduct continuous emissions monitoring for NOx emissions of the affected boilers with a PEMS that addresses compliance with both NSPS and permit limits for NOx emissions and that meets USEPA Performance Specification 16 (PS 16), in 40 CFR Part 60 Appendix B, (including successful completion of all the required certification testing and evaluations under PS 16), provided that:
- i. The initial performance test for the NOx emissions of the affected boiler is conducted with the PEMS; and
 - ii. With the report for this performance test that is submitted to the Illinois EPA, the Permittee also submits a PEMS monitoring system report demonstrating fulfillment of PS 16 and a copy of the initial PEMS Plan required by Condition 2.1.8-2(d)(ii).

Note: This permit addresses use of PEMS as it would be a form of operational monitoring, as provided for by applicable provisions of the NSPS, 40 CFR 60.48b(g)(2) and 60.49b(c), and use of a PEMS was proposed in the application. If the initial performance test for NOx is conducted with a CEMS, this permit does not provide for use of a PEMS.

- d. When conducting NOx monitoring for the affected boiler with a PEMS, the Permittee shall:
- i. Fulfill applicable requirements of PS-16 for the design and operation of a PEMS, including applicable requirements of Section 6.1 (PEMS Design), Section 6.2 (Recordkeeping), Section 8.4 (Reporting), Section 8.5 (Reevaluating Your PEMS) and Sections 9 (Quality Control).
 - ii. Implement the PEMS in accordance with a written PEMS plan developed and maintained by the Permittee that, at a minimum, describes the PEMS and identifies the operating parameters of the boiler that are needed to determine the NOx emissions of the boiler and verify compliance with

applicable standards and emission limits for NOx. The Permittee shall notify the Illinois EPA of any significant changes to the PEMS Plan, providing a description of the change, the reason for the change and the expected effects on the PEMS.

- iii. Operate and maintain continuous monitors for the steam load of the boiler and other operating parameters of the boiler as specified in the PEMS Plan. These parametric monitoring systems shall be operated during all periods of operation of the boiler except for monitoring system breakdowns and repairs, consistent with 40 CFR 60.48b(c).
- iv. Report deviations from the PEMS Plan and the above requirements to the Illinois EPA as deviations from monitoring or permit requirements.

2.1.9 Recordkeeping Requirements

- a.
 - i. For the affected boilers, the Permittee shall comply with all applicable recordkeeping requirements of the NSPS, including 40 CFR 60.7(b) and (f) and 60.49b(d) and (g).
 - ii. For the affected boilers, the Permittee shall comply with all applicable recordkeeping requirements of the NESHAP, including 40 CFR 63.9 and 63.10, and 63.11225.
- b. The Permittee shall maintain a file or other records containing the following information for the affected boilers:
 - i. The manufacturer's specifications for the affected boilers including emissions guarantees and rated heat input capacity (mmBtu/hour).
 - ii. The operating and maintenance procedures for the affected boilers recommended by the manufacturer.
- c. The Permittee shall keep the following operating records for the affected boilers:
 - i. Daily records of fuel usage and monthly records of annual capacity factor for each affected boiler, as required by 40 CFR 60.49b(d).
 - ii. Records for the total usage of oil by the affected boilers (gallons/calendar year).
 - iii. Records identifying periods when oil was fired in each boiler with reason, e.g., operational testing to verify readiness or actual interruption or curtailment of the natural gas supply.

- iv. Records of steam output of each boiler (pounds/month and pounds/year).
 - v. An inspection, maintenance and repair log, including date and nature of activity.
- d. The Permittee shall maintain the following records for each occurrence when operation of an affected boiler continued during a malfunction or breakdown that acted to increase emissions or affect emission compliance, including the following information:
- i. Date and duration of malfunction or breakdown.
 - ii. A description of the malfunction or breakdown.
 - iii. The corrective actions used to reduce the quantity of emissions and the duration of the occurrence.
 - iv. If excess emissions occurred:
 - A. An explanation why continued operation of the affected boiler was necessary.
 - B. The preventive measures planned or taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity.
 - C. An estimate of the magnitude of excess emissions during the occurrence.
- e. The Permittee shall maintain an operating log or other similar records for the affected boilers that includes the information specified in Condition 3.2(a).
- f. The Permittee shall maintain the following records related to the emissions of each affected boiler:
- i. A file containing a demonstration that the emissions of the boiler when operating normally will comply with the applicable hourly emission limits in 2.1.6(a)(i) for pollutants other than NO_x, with supporting documentation, which information shall be kept current.
 - ii. Records of NO_x emissions and other related information as needed to verify compliance with the alternative emission limit for NO_x in Condition 2.1.6(a)(ii).
 - iii. Records of the emissions of NO_x, CO, PM, PM₁₀, PM_{2.5}, VOM and GHG, as CO₂e (tons/month and tons/year), with supporting calculations.

- g. The Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9 for the affected boilers that it conducts or that are conducted at its behest. For each occasion on which such measurements are made, these records shall include the formal report for the measurements if conducted pursuant to Condition 2.1.7-3 or otherwise the identity of the observer, a description of the measurements that were made, the operating condition of the affected boilers, the observed opacity, and copies of the raw data sheets for the measurements.
- h. Unless otherwise specified, all records required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

2.1.10 Reporting Requirements

- a.
 - i. For the affected boilers, the Permittee shall comply with all applicable notification and reporting requirements of the NSPS, including 40 CFR 60.7(a), (c), (d) and (e) and 60.49b(b).
 - ii. For the affected boilers, the Permittee shall comply with all applicable reporting requirements of the NESHAP, including 40 CFR 63.9 and 63.10, and 63.11225.
- b.
 - i. Pursuant to 35 IAC 201.263, the Permittee shall immediately report to the Illinois EPA, Regional Office, by telephone or fax upon continued operation of the affected boiler during a malfunction or breakdown of the boiler that has been accompanied by a violation of 35 IAC 216.121.
 - ii. The Permittee shall submit a written follow-up report to the Illinois EPA within five business days providing a detailed explanation of the event and explanation why continued operation of the affected boiler was necessary, the length of time during which operation continued under such conditions, the measures by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed or the affected boiler was taken out of service.

PART 3: GENERAL PERMIT CONDITIONS

CONDITION 3.1: GENERAL REQUIREMENTS FOR EMISSION TESTING

- a.
 - i. Except as provided below, by Condition 3.1(a)(ii), at least 60 days prior to the actual date of emission testing required by this permit, a written test plan shall be submitted to the Illinois EPA for review. This plan shall describe the specific procedures for testing and shall include at a minimum:
 - A. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - B. The specific conditions, e.g., operating rate and control device operating conditions, under which testing shall be performed including a discussion of why these conditions will be representative and the means by which the operating parameters will be determined.
 - C. The specific determinations of emissions that are intended to be made, including sampling and monitoring locations.
 - D. The test method(s) that will be used, with the specific analysis method if the method can be used with different analysis methods.
 - ii. As provided by 35 IAC 283.220(d), the Permittee need not submit a test plan for emissions testing that will be conducted in accordance with the procedures used for previous tests accepted by the Illinois EPA or the previous test plan submitted to and approved by the Illinois EPA, provided that the Permittee's notification for testing, as required below, contains the information specified by 35 IAC 283.220(d)(1)(A), (B) and (C).
- b.
 - i. The Permittee shall notify the Illinois EPA prior to performing emissions testing required by this permit to enable the Illinois EPA to observe the tests. Notification for the expected date of testing shall be submitted a minimum of 30 days prior to the expected date, and identify the testing that will be performed. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of testing. Notwithstanding 40 CFR 60.8(d), the Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.

- ii. This notification shall also identify the parties that will be performing testing and the set or sets of operating conditions under which testing will be performed.
- c. Three copies of the Final Reports for emission tests shall be forwarded to the Illinois EPA within 30 days after the test results are compiled and finalized but not later than 90 days after the date of testing. At a minimum, the Final Report for testing shall contain the following.
 - i. General information
 - ii. A tabular summary of results which includes:
 - Process rates (e.g., gas usage rate or firing rate)
 - Measured emission rates for different pollutants tested
 - Emission factor, calculated using the average test results in the terms of the applicable limits, for example, in units of lbs pollutant emitted per mmBtu
 - Compliance demonstrated - Yes/No
 - iii. Description of test method(s) and procedures, including a description of sampling points, sampling train, analysis equipment, and test schedule;
 - iv. Detailed description of test conditions, including:
 - Pertinent process information (e.g., usage of fuel and composition.)
 - Control equipment information (i.e., monitored data and other relevant operating parameters during testing).
 - v. Data and calculations, including copies of all raw data sheets and records of laboratory analysis, sample calculations, and data on equipment calibration.
 - vi. The results of all quality control evaluations, with a copy of all qualified data.
- d. Records of the initial performance test, including operating parameters monitored during the test, shall be kept for the life of the unit. Records of subsequent tests shall be maintained for a minimum of five years.

CONDITION 3.2: GENERAL REQUIREMENTS FOR "LOGS" OR SIMILAR RECORDS

- a. Operating logs or other similar records required by this permit shall, at a minimum, include the following information related to the affected boilers:
 - i. Information identifying periods when a boiler was not in service.
 - ii. Information for each startup of the boiler, including times for key steps during startup, any unusual occurrences during the startup, and any deviations from the established startup procedures.
 - iii. For periods when a boiler is in service and operating normally, relevant process and control system information to generally confirm normal operation.
 - iv. For periods when a boiler is in service and is not operating normally, identification of each such period, with detailed information describing the operation of the unit(s), the potential consequences for additional emissions from the unit(s), the potential of any excess emissions from the affected unit(s), the actions taken to restore normal operation, and any actions taken to prevent similar events in the future.
 - v. Other information as may be appropriate to show that the boilers are operated in accordance with good air pollution control practices.
- b. Inspection, maintenance and repair logs or other similar information required by this permit shall, at a minimum, include the following information related to the boilers and associated control measures:
 - i. Identification of equipment, with date, time, responsible employee and type of activity.
 - ii. For inspections, a description of the inspection, findings, and any recommended actions, with reason.
 - iii. For maintenance and repair activity, a description of actions taken, reason for action (e.g., preventative measure or corrective action as a result of inspection), probable cause for requiring maintenance or repair if not routine or preventative, and the condition of equipment following completion of the activity.
 - iv. Other information as may be appropriate to show that the emission unit or group of related emission units is maintained in accordance with good air pollution control practices, including prompt repair of defects that interfere with effective control of emissions.

- c. The logs required by this permit may be kept in manual or electronic form, and may be part of a larger information database maintained by the Permittee provided that the information required to be kept in a log is readily accessible.

CONDITION 3.3: GENERAL REQUIREMENTS FOR RECORDKEEPING FOR DEVIATIONS

Except as specified in a particular provision of this permit or in a subsequent CAAPP Permit for the plant, records for deviations from applicable requirements shall include at least the following information: the date, time and estimated duration of the deviation; a description of the deviation; the manner in which the deviation was identified, if not readily apparent; the probable cause for deviation, if known, including a description of any equipment malfunction or breakdown associated with the deviation; information on the magnitude of the deviation, including actual emissions or performance in terms of the applicable standard if measured or readily estimated; confirmation that standard procedures were followed or a description of any event-specific corrective actions taken; and a description of any preventative measures taken to prevent future occurrences, if appropriate.

CONDITION 3.4: GENERAL REQUIREMENTS FOR REPORTING OF DEVIATIONS

- a. The Permittee shall include the following information in records and reports for deviations:
 - i. Identity of the deviation, with date, time, duration and description.
 - ii. Describe the effect of the deviation on compliance, with an estimate of the excess emissions that accompanied the deviation, if any.
 - iii. Describe the probable cause of the deviation and any corrective actions or preventive measures taken.
- b.
 - i. Unless otherwise specified in a particular condition of this permit, if deviation(s) from requirements of this permit occurs during a reporting period, a compliance report shall be submitted no later than 45 days after the end of the reporting period. This report shall also provide a listing of all deviations for which immediate or 30-day reporting was required, but need not include copies of the previously submitted information.
 - ii. If there is a deviation of the requirements of this permit, not otherwise addressed pursuant to the reporting requirements established in this permit, the Permittee shall submit a report to the Illinois EPA within 30 days after deviation. The report shall include a description of the deviation, the

probable cause of the deviations, the corrective actions that were taken and any actions taken to reduce future occurrences.

- c.
 - i. For the purpose of determining whether a deviation must be reported prior to a periodic compliance report, a deviation shall be considered to continue even if operation of an emission unit is interrupted if the deviation is still present when operation of the unit is resumed.
 - ii. When this permit requires immediate notification, such notification shall be provided by telephone and followed by facsimile or e-mail transmittal of a narrative report.
- d. Upon issuance of a CAAPP permit for the affected facility, the provisions of the CAAPP permit with respect to reporting of deviations will supersede the requirements of this permit for reporting of deviations.

ATTACHMENTS

ATTACHMENT 1:

TABLE 1 - SUMMARY OF PERMITTED EMISSIONS OF THE AFFECTED BOILERS

Pollutant	Boilers (Each)			Annual Limits ¹
	Natural Gas		Distillate Oil	Total
	Lb/Hour	Tons/Year	Tons/Year	Tons/Year
NOx	9.70	42.5	0.98	82.7
PM ²	0.46	2.02	0.20	4.1
PM ₁₀ /PM _{2.5} ³	0.58	2.55	0.24	5.1
CO	9.70	42.5	1.12	82.8
VOM	1.21	5.3	0.07	10.3
SO ₂	0.14	0.6	4.26	5.5
Individual HAP ⁴	0.43	1.9	0.01	3.6
Total HAPs	0.45	2.0	0.02	3.8

¹ Annual Limits are based on the requested limit of 4,005 mscf per year of gas usage shared by the three new boilers plus the requested shared distillate oil limit of 2000,000 gallons per year.

² PM emissions only include filterable particulate as measured by USEPA Method 5 or other appropriate USEPA Test Method.

³ PM₁₀ and PM_{2.5} emissions include both filterable and condensable particulate.

⁴ Highest individual HAP is Hexane for natural gas combustion and formaldehyde for distillate oil combustion.

ATTACHMENT 2: EVALUATIONS OF CHANGES IN EMISSIONS

Table 2.1: Project Emissions - Phase 1 (Tons/Year)

Emission Unit	NOx	CO	VOM	SO ₂	PM/PM ₁₀ /PM _{2.5} ^a
Boiler #3	43.5	43.6	5.4	4.9	2.9/2.8/2.8
Significance Threshold:	40	100	40	40	25/15/10
Greater Than Significant?	Yes	No	No	No	No

Notes:

- a. PM, PM₁₀ and PM_{2.5} emissions include condensable particulate, as well as filterable particulate.

Table 2.2: Analysis of Changes in Emissions with Phase 1 (Tons/Year)

Component	Netting	For Information Only (not netting)			
	NOx	CO	VOM	SO ₂	PM/PM ₁₀ /PM _{2.5}
Project Emissions					
New Boiler #3	43.5	43.6	5.4	4.9	2.5/3.2/3.2
Contemporaneous Increases and Decreases in Emissions ^a					
Increases					
	-	-	-	-	-
Decreases ^c					
Existing Boilers 3 and 4	22.8	30.0	2.0	2.7	0.28/0.72/0.60
Emission Change ^d					
Significance Threshold:	40	100	40	40	25/15/10
Greater Than Significant?	No	No	No	No	No

Notes:

- a. For Phase I, this permit relies upon contemporaneous decreases for emissions of NOx.
- b. This netting analysis is based on the contemporaneous time period for this project beginning in Jan 2004, which is ten years before December 2013, when the application was received.
- c. The contemporaneous decreases in emissions are the actual emissions from the existing Boilers 3 and 4, which will be demolished before on-site construction begins new Boiler 3.
- d. The change in emissions is the difference between the past emissions and the potential emissions of the new boilers. As shown, UIUC's application indicates that there will not be a significant increase or net increase for any PSD pollutant.

Table 2.3: Overall Project Emissions (Phase 1 and Phase 2^a) (Tons/Year)

Emission Unit(s)	NO _x	CO	VOM	SO ₂	PM/PM ₁₀ /PM _{2.5} ^a
New Boilers 1, 2 and 3	82.7	82.8	10.3	5.5	4.1/5.1/5.1
Significance Threshold:	40	100	40	40	25/15/10
Greater Than Significant?	Yes	No	No	No	No/No/No

Notes:

- a. The construction of the second boiler, Boiler 1 and third boiler, Boiler 2, will not commence until after Phase 1 is completed.
- b. PM, PM₁₀, and PM_{2.5} emissions include condensable particulate, as well as filterable particulate.

Table 2.4 Analysis of Changes in Emissions with the Project (Tons/Year)

Component	Netting ^a	For Information Only (not netting)			
	NOx	CO	VOM	SO ₂	PM/PM ₁₀ /PM _{2.5}
Project Emissions					
	82.7	82.8	10.3	5.5	4.1/5.1/5.1
Contemporaneous Increases and Decreases in Emissions					
Increases					
	-	-	-	-	-
Decreases^b					
Existing Boilers 3 and 4	22.8	30.0	2.0	2.7	0.28/0.72/0.60
Existing Boiler 2	20.4	26.8	1.9	16.1	0.13/0.33/0.27
Subtotal	43.2	56.8	3.9	18.8	0.41/1.05/0.87
Emission Change^c					
Significance Threshold:	40	100	40	40	25/15/10
Greater Than Significant?	No	No	No	No	No/No/No

Notes:

- a. For the overall project, Phases 1 and 2, this permit relies upon contemporaneous decreases for emissions of NOx, PM₁₀ and PM_{2.5}.
- b. The contemporaneous decreases in emissions are the actual emissions from Boilers 2, 3 and 4, which will all be demolished before on-site construction begins on Phase 2.
- c. As shown, the application indicates that there will not be significant increases or net increase in emissions for any PSD pollutant.

ATTACHMENT 3: STANDARD PERMIT CONDITIONS

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits, which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Illinois EPA and a supplemental written permit issued.
4. The Permittee shall allow any duly authorized agent of the Illinois EPA upon the presentation of credentials, at reasonable times:
 - a. To enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. To have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. To inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. To obtain and remove samples of any discharge or emissions of pollutants, and
 - e. To enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

5. The issuance of this permit:
 - a. Shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located;
 - b. 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 proposed facilities;
 - c. Does not release the Permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations;
 - d. Does not take into consideration or attest to the structural stability of any units or parts of the project; and
 - e. 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 proposed equipment or facility.
- 6a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Illinois EPA before the equipment covered by this permit is placed into operation.
- b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
7. The Illinois EPA may file a complaint with the Board for modification, suspension or revocation of a permit.
 - a. Upon discovery that the permit application contained misrepresentations, misinformation or false statement or that all relevant facts were not disclosed, or
 - b. Upon finding that any standard or special conditions have been violated, or
 - c. Upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.