

Attention:

Nicor Gas
Attn: Somali Tomczak
1844 Ferry Road
Naperville, Illinois 60563-9600

State of Illinois

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

[Title I and Title V Permit]

Source:

Nicor Gas – Station No. 50
169 North 36th Road
Troy Grove, Illinois 61342

I.D. No.: 099832AAF
Permit No.: 95120023

Permitting Authority:

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



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

[Title I and Title V Permit]

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

ID No.: 099832AAF
Permit No.: 95120023
Statement of Basis No.: 95120023-1410

Date Application Received: September 18, 2006
Date Issued: December 15, 2014
Expiration Date: December 15, 2019
Renewal Submittal Date: 9 Months Prior to December 15, 2019

Source Name: Nicor Gas - Station No. 50
Address: 169 North 36th Road
City: Troy Grove
County: LaSalle
ZIP Code: 61342

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

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

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

REP:MTR:ZM:jws

cc: IEPA, Permit Section
IEPA, FOS, Region 2
Lotus Notes Database

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Section 1 - Source Information

1. uid fuel.

| | |
|---|---|
| <p><u>Source</u></p> <p>Nicor Gas - Station No. 50 169 North 36th Road Troy Grove, Illinois 61342</p> <p><u>Operator</u></p> <p>Nicor Gas 1844 Ferry Road Naperville, Illinois 60563-9600</p> | <p><u>Owner</u></p> <p>Nicor Gas 1844 Ferry Road Naperville, Illinois 60563-9600</p> <p><u>Permittee</u></p> <p>The Owner and Operator of the source as identified in this table.</p> |
|---|---|

2. Contacts

Certified Officials

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

| | <i>Name</i> | <i>Title</i> |
|-----------------------------|--|--|
| <i>Responsible Official</i> | Timothy J. Hermann | Vice President, Storage and Peaking Operations |
| <i>Delegated Authority</i> | No other individuals have been authorized by the IEPA. | N/A |

Other Contacts

| | <i>Name</i> | <i>Phone No.</i> | <i>Email</i> |
|--------------------------|-----------------|------------------|-------------------------|
| <i>Source Contact</i> | Somali Tomczak | 630-388-2837 | stomcza@agresources.com |
| <i>Technical Contact</i> | Claudia Macholz | 630-388-2456 | cmachol@agresources.com |
| <i>Correspondence</i> | Claudia Macholz | 630-388-2456 | cmachol@agresources.com |
| <i>Billing</i> | Claudia Macholz | 630-388-2456 | cmachol@agresources.com |

3. Single Source

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

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

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Section 2 - General Permit Requirements

1. Prohibitions

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

2. Emergency Provisions

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

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

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

3. General Provisions

a. Duty to Comply

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

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

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

c. Duty to Maintain Equipment

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7)(a) of the Act]

d. Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

- i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID No., Permit No., and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

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

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

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

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
 - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
 - B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.
 - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

4. Testing

- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if test methods are not specified by applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the IEPA shall be

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submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7) (a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. **Testing by Owner or Operator:** The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
 - ii. **Testing by the IEPA:** The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7) (b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates maintenance activities were performed and the nature of the preventative maintenance activities.

b. Retention of Records

- i. Records of all monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7) (e) (ii) of the Act]
- ii. Pursuant to Section 39.5(7) (a) of the Act, other records required by this permit, including any logs, plans, procedures, or instructions required to be kept, shall be retained for a period of at least five years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

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

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shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

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

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b), the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after October 16, 2014 (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way

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affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

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

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable CAA requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority as "T1".
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "T1R".
 - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "T1N".
 - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

9. Reopening and Revising Permit

a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or

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termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

b. Reopening and Revision

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

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

c. Inaccurate Application

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

d. Duty to Provide Information

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

10. Emission 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 in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(l) and (o) of the Act]
- b. For purposes of permit renewal, a timely application is one that is submitted no less than nine months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item

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of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

13. Startup, Shutdown and Malfunction

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

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Section 3 - Source Requirements

1. Applicable Requirements

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

a. Fugitive Particulate Matter

i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.

ii. Compliance Method (Fugitive Particulate Matter)

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

b. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

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

c. Asbestos Demolition and Renovation

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

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

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

d. Future Emission Standards

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

2. Applicable Plans and Programs

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

a. Fugitive PM Operating Program

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

b. PM₁₀ Contingency Measure Plan

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM₁₀ Contingency Measure Plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM₁₀ Contingency Measure Plan.

c. Episode Action Plan

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as

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required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.

- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on August 1, 2011, 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 through 244.165.
- v. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

d. Risk Management Plan

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

3. Title I Requirements

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

4. Synthetic Minor Limits

a. i. HAP Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act and Construction Permit 01100063, individual and total HAP emissions from the units at the source shall not exceed the following limits: [T1R]

| <u>Pollutant</u> | <u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> |
|----------------------|------------------|------------------|
| Formaldehyde | 1.6 | 8.4 |
| Toluene | 1.7 | 8.0 |
| Other Individual HAP | 1.0 | 5.0 |
| Combination of HAPs | 4.0 | 22.0 |

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ii. Compliance Method (HAP Requirements)Monitoring

- A. Pursuant to Construction Permit 01100063, compliance with the monthly limits shall be determined on a block-monthly basis. Compliance with the 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]
- B. Pursuant to Section 39.5(7)(b) of the Act, in addition to the requirements in Section 4 of this permit, the total heat content of the fuel fired in the permitted units in Section 4 of this permit shall not exceed 656,591 mmBtu/mo and 4,666,211 mmBtu/yr. These synthetic minor limits will allow the source to remain below major source limits for HAPs pursuant to Condition 3.4(a)(i)(A). Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

Testing

- A. Pursuant to Section 39.5(7)(b) of the Act to verify compliance with Condition 3.4(a)(i)(A) that this source remains an area source of HAPs, the following testing requirements are established:
- I. If, in the previous calendar year, source-wide HAP emissions exceeded the limits in Condition 3.4(a)(i)(A) for an individual HAP or total HAPs, then testing for HAPs shall be conducted on specific emission units as described in a test protocol prepared by the Permittee and submitted to the IEPA. Emission units required to be tested will be determined by the IEPA.
- II. The calculation as to whether the HAP limits specified in Condition 3.4(a)(i)(A) was exceeded shall be based on the records and procedures in Conditions 3.4(a)(ii)(A), 3.4(a)(ii)(D), and 3.4(a)(ii)(E), and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by September 30.
- III. The Permittee also shall comply with all the requirements of Conditions 2.4 and 7.1 for any such tests.

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of individual HAP and combined HAPs emissions on a monthly and annual basis for the emission units covered in Section 4 of this permit to demonstrate compliance with Condition 3.4(a)(i)(A).
- B. Pursuant to Construction Permit 01100063, the Permittee shall keep a file of the potential emissions of individual HAP and total HAPs from each emission unit at the source, with supporting data and calculations. For this purpose, emissions of each unit shall be determined at the maximum hourly rate and continuous operation (8760 hr/yr), and further supplemented to address periods of excess emissions authorized by 35 IAC 201.262. This file shall be revised on at least an annual basis and updated so that it is current. [T1]
- C. If testing is required by Condition 3.4(a)(ii)(C), the Permittee shall keep records of the testing, including the test date, conditions, methodologies,

calculations, test results, and any discrepancies between the test results and applicability determinations of Condition 3.4(a)(ii)(G).

- D. Pursuant to 40 CFR 63.10(b)(3), the Permittee shall keep a record of the applicability determination for 40 CFR Part 63 Subparts YYYY and ZZZZ at the source for a period of five years after the determination. This determination shall include a detailed analysis that demonstrates why the Permittee believes that the source is not subject to 40 CFR Part 63 Subparts YYYY and ZZZZ as a major source for HAPs.

5. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
- I. Requirements in Conditions 3.1(a)(i), 3.1(b), 3.1(c), and 3.1(d).
 - II. Requirements in Conditions 3.2(a), 3.2(b), 3.2(c), and 3.2(d).
 - III. Requirements in Condition 3.4(a)(i)(A).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
- A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

b. Semiannual Reporting

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

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

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

c. Annual Emissions Reporting

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

Section 4 - Emission Unit Requirements

4.1 Turbines (OC5, OC6, OC7, SC24, SC26, SC21, SC22, SC23, and SC25)

1. Emission Units and Operations

| Emission Units | Pollutants Being Regulated | Original Construction Date | Modification/ Reconstruction Date | Air Pollution Control Devices or Measures | Monitoring Devices |
|--|----------------------------|----------------------------|-----------------------------------|---|--------------------|
| Three 9,800 HP output/96.7 mmBtu/hr heat input rate of Natural Gas-Fired Orenda Compressor Turbines (OC5, OC6, and OC7) | PM, SO ₂ , HAPs | Jan. 1965 | N/A | None | None |
| Two 1,275 HP output/10.2 mmBtu/hr heat input rate of Natural Gas-Fired Solar Compressor Turbines (SC24 and SC26) | PM, SO ₂ , HAPs | 1963 | N/A | None | None |
| Four 1,300 HP output/10.2 mmBtu/hr heat input rate of Natural Gas-Fired Solar Compressor Turbines (SC21, SC22, SC23, and SC25) | PM, SO ₂ , HAPs | 1963 | Dec. 2005 | None | None |

2. Applicable Requirements

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

a. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30%, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each turbine in accordance with Method 22 for visible emissions at least once every calendar year in which the equipment operates. If visible emissions greater than 30% are observed, the Permittee shall take corrective action within four hours of such observation. Corrective action may include, but not limited to, shut down of the engine, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within seven days in accordance with Condition 2.4.

Recordkeeping

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

I. Records of 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

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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 four hours of the observation.

II. Records of all Method 9 opacity measurements made in accordance with Condition 4.1.2(a)(ii)(A).

b. i. Sulfur Dioxide (SO₂) Requirements

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

ii. Compliance Method (SO₂ Requirements)

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

c. i. Operational and Production Requirements

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

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

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

d. i. Work Practice Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall, to the extent practicable, maintain and operate the turbines in a manner consistent with safety and good air pollution control practice for minimizing emissions at all times including periods of startup, shutdown, and malfunction.

ii. Compliance Method (Work Practice Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of each turbine and associated auxiliary equipment.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of the following items for the turbines to demonstrate compliance with the applicable requirements above and the source-wide Conditions 3.4(a)(i) and 8.1:

I. Records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description

of any maintenance and repair activities that resulted in a modification or reconstruction of the piece of equipment.

- II. Turbine rating for each turbine, HP.
- III. Operating hours for each turbine, hr/mo and hr/yr.
- IV. Monthly and annual emissions of PM, SO₂, VOM, CO, and NO_x (tons/mo and tons/yr) from the turbines based on fuel consumption and other operating data, and appropriate emission factors, with supporting calculations.

3. Non-Applicability Requirements

- a. The turbines are not subject to the NSPS for Stationary Combustion Turbines, 40 CFR Part 60 Subpart KKKK, either because the turbines commenced construction, modification, or reconstruction prior to February 18, 2005 (for Turbines OC5, OC6, OC7, SC24, and SC26) or their heat input at peak load is less than 10.7 gigajoules (10 mmBtu) per hour (for Turbines SC21, SC22, SC23, and SC25), based on the higher heating value of the fuel, pursuant to 40 CFR 60.4305(a).
- b. The turbines are not subject to the New Source Performance Standards (NSPS) for Stationary Gas Turbines, 40 CFR Part 60 Subpart GG, either because the turbines commenced construction, modification, or reconstruction prior to October 3, 1977 (for Turbines OC5, OC6, OC7, SC24, and SC26) or their heat input at peak load is less than 10.7 gigajoules (10 mmBtu) per hour (for Turbines SC21, SC22, SC23, and SC25), based on the lower heating value of the fuel fired, pursuant to 40 CFR 60.330.
- c. The turbines are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines, 40 CFR Part 63 Subpart YYYY, because these turbines are located at an area source for HAPs.
- d. The turbines are not subject to 35 IAC 212.322, because these turbines do not have a process weight rate as defined in 35 IAC 211.5250 so that such rules cannot reasonably be applied, pursuant to 35 IAC 212.323.
- e. The turbines are not subject to 35 IAC 215.301, because these turbines do not use organic material that would make them subject to 35 IAC 215.301.
- f. The turbines are not subject to 35 IAC 216.121, because these turbines are not a fuel combustion emission unit as defined by 35 IAC 211.2470.
- g. The turbines are not subject to 35 IAC Part 217 Subpart Q, because these turbines are not located in the areas given in 35 IAC 217.386(a)(2).
- h. The turbines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for SO₂, because these turbines do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

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

a. Operational Flexibility Requirements

- i. Pursuant to Sections 39.5(7)(a) of the Act, the Permittee is authorized to make the following physical or operational change with respect to a turbine without prior notification to the IEPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a

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timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- A. The Permittee may refurbish the combustion unit on a turbine or replace it with a similar unit consistent with the Permittee's historic practice with respect to repair of the turbine. This authorization does not extend to changes that are intended to increase the power output of a turbine.

5. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), 4.1.2(c)(i), and 4.1.2(d)(i).
 - II. Requirements in Conditions 4.1.4(a)(i) and 4.1.4(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the information required in Condition 3.5(a)(iii).

4.2 Turbines (DR31 and Mars 41)

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|---|---|-----------------------------------|--|--|---------------------------|
| One 5,700 HP output/51.0 mmBtu/hr heat input rate of Natural Gas-Fired Dresser Rand Turbine (DR31) | PM, SO ₂ , VOM, CO, NO _x , HAPS | Apr. 1995 | Dec. 1996 | None | None |
| One 15,000 HP output/112.0 mmBtu/hr heat input rate of Natural Gas-Fired Solar Mars Turbine (Mars 41) | PM, SO ₂ , VOM, CO, NO _x , HAPS | Dec. 2002 | N/A | Low-NO _x Combustor | None |

2. Applicable Requirements

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

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30%, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each turbine in accordance with Method 22 for visible emissions at least once every calendar year in which the equipment operates. If visible emissions greater than 30% are observed, the Permittee shall take corrective action within four hours of such observation. Corrective action may include, but not limited to, shut down of the engine, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within seven days in accordance with Condition 2.4.

Recordkeeping

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

I. Records of 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 four hours of the observation.

II. Records of all Method 9 opacity measurements made in accordance with Condition 4.2.2(a)(ii)(A).

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b. i. Particulate Matter (PM) Requirements

- A. Pursuant to Construction Permit 95030010, hourly and annual PM emissions from the turbine DR31 shall not exceed 0.71 lb/hr and 1.8 tons/yr, respectively. [T1]
- B. Pursuant to Construction Permit 01100063, hourly and annual PM emissions from the turbine Mars 41 (originally EXC1) shall not exceed 0.74 lb/hr and 3.25 tons/yr, respectively. [T1]

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to Construction Permits 95030010 and 01100063, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a file of PM emissions from the turbines with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

c. i. Sulfur Dioxide (SO₂) Requirements

- A. Pursuant to 40 CFR 60.330, the turbines DR31 and Mars 41 are subject to the SO₂ emission limit requirements of the NSPS for Stationary Gas Turbines, 40 CFR Part 60 Subpart GG, because these turbines have a heat input at peak load equal to or greater than 10.7 gigajoules (10 mmBtu) per hour, based on the lower heating value of the fuel fired, which commenced construction, modification, or reconstruction after October 3, 1977 and prior to February 18, 2005.

I. Standard for Sulfur Dioxide

Pursuant to 40 CFR 60.333(b), the Permittee shall not burn in the turbines any fuel which contains sulfur in excess of 0.8% by weight (8,000 ppmw).

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

- C. I. Pursuant to Construction Permit 95030010, emissions of SO₂ from the turbine DR31 shall not exceed 0.03 lb/hr and 0.1 tons/yr. [T1]
- II. Pursuant to Construction Permit 01100063, emissions of SO₂ from the turbine Mars 41 (EXC1) shall not exceed 0.38 lb/hr and 1.67 tons/yr. [T1]

ii. Compliance Method (SO₂ Requirements)

Monitoring

- A. Pursuant to Construction Permits 95030010 and 01100063, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records:
 - I. A file demonstrating that the fuel fired in the turbines meets the definition of "pipeline natural gas" as described in 40 CFR 72.2.
 - II. A file of SO₂ emissions from the turbines with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

d. i. Volatile Organic Material (VOM) Requirements

- A. Pursuant to Construction Permit 95030010, emissions of VOM from the turbine DR31 shall not exceed 0.12 lb/hr and 0.3 tons/yr. [T1]
- B. Pursuant to Construction Permit 01100063, emissions of VOM from the turbine Mars 41 (EXC1) shall not exceed 4.29 lb/hr and 18.83 tons/yr. [T1]

ii. Compliance Method (VOM Requirements)

Monitoring

- A. Pursuant to Construction Permits 95030010 and 01100063, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a file of VOM emissions from the turbines with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

e. i. Carbon Monoxide (CO) Requirements

- A. Pursuant to Construction Permit 95030010, emissions of CO from the turbine DR31 shall not exceed 2.96 lb/hr and 7.5 tons/yr. [T1]
- B. Pursuant to Construction Permit 01100063, emissions of CO from the turbine Mars 41 (EXC1) shall not exceed 13.88 lb/hr and 60.83 tons/yr. [T1]

ii. Compliance Method (CO Requirements)

Monitoring

- A. Pursuant to Construction Permits 95030010 and 01100063, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a file of CO emissions with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

f. i. Nitrogen Oxide (NO_x) Requirements

- A. Pursuant to 40 CFR 60.330, the turbines DR31 and Mars 41 are subject to the NO_x emission limit requirements of the NSPS for Stationary Gas Turbines, 40

CFR Part 60 Subpart GG, for the same reason as described in Condition 4.2.2(c) (i) (A).

I. Standard for Nitrogen Oxides

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

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

Where:

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

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

F = NO_x emission allowance for fuel-bound nitrogen calculated from the nitrogen content of the fuel as follows:

| Fuel-bound Nitrogen (percent by weight) | F (NO _x percent by volume) |
|--|--|
| N<0.015 | 0 |
| 0.015<N≤0.1 | 0.04 (N) |
| 0.1<N≤0.25 | 0.004+0.0067 (N-0.1) |
| N>0.25 | 0.005 |

Where:

N = The nitrogen content of the fuel (percent by weight) determined in according with the methods and procedures in 40 CFR 60.334.

B. Pursuant to Construction Permit 95030010, emissions of NO_x from the turbine DR31 shall not exceed 15.00 lb/hr and 37.8 tons/yr. [T1]

C. Pursuant to Construction Permit 01100063, the following limits of NO_x emissions are established:

I. NO_x emissions from the turbine Mars 41 (EXC1) shall not exceed 0.58 g/BHP-hr. [T1]

II. NO_x emissions from the turbine Mars 41 (EXC1) shall not exceed 16.55 lb/hr and 72.42 tons/yr. [T1]

ii. Compliance Method (NO_x Requirements)

Monitoring

A. Pursuant to Construction Permits 95030010 and 01100063, compliance with the 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]

B. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep on file documentation supporting an F-value of zero being used for the fuel.

Pursuant to 40 CFR 60.334(h)(2), the Permittee shall monitor the nitrogen content of the fuel combusted in each turbine, if the Permittee claims an allowance for fuel bound nitrogen (i.e., if an F-value greater than zero is being or will be used by the Permittee to calculate STD in 40 CFR 60.332).

Testing

- C. Pursuant to 40 CFR 60.335, the following requirements of test methods and procedures are established:
- I. Pursuant to 40 CFR 60.335(a), the Permittee shall conduct the performance tests required in 40 CFR 60.8 for the turbines, using the methods specified in 40 CFR 60.335(a).
 - II. Pursuant to 40 CFR 60.335(b), the Permittee shall determine compliance with the NO_x emission limit of Condition 4.2.2(f)(i)(A) and shall meet the performance test requirements of 40 CFR 60.8 as specified in 40 CFR 60.335(b).
 - III. Pursuant to 40 CFR 60.335(c), the Permittee may use the following as alternatives to the reference methods and procedures specified in 40 CFR 60.335:

Instead of using the equation in 40 CFR 60.335(b)(1), manufacturers may develop ambient condition correction factors to adjust the nitrogen oxides emission level measured by the performance test as provided in 40 CFR 60.8 to ISO standard day conditions.
- D. Pursuant to Section 39.5(7)(b) of the Act and the approval by the IEPA on March 21, 2008, if the Permittee intends to use a previously submitted protocol for the monitoring required in Condition 4.2.2(f)(ii)(B), a statement of intent to use the protocol shall be included with the 30-day test notification of Condition 7.1(b)(i). If the Permittee intends not to use a previously submitted protocol, a new protocol must be submitted 60 days prior to testing in accordance with Condition 7.1(a).

Recordkeeping

- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the performance tests of Condition 4.2.2(f)(ii)(C) and the following items for the turbines:
- I. Identification, type (e.g., lean-burn, gas-fired), and location of each turbine.
 - II. Calendar date of the record.
 - III. Records of the nitrogen content of the fuel combusted in the turbines.
 - IV. The results of all monitoring performed on each turbine and reported deviations.
 - V. The results of all tests performed on each turbine.
 - VI. The plan for performing inspection and maintenance of each turbine, air pollution control equipment, and the applicable monitoring device.
 - VII. A log of inspections and maintenance performed on each turbine's air emissions, monitoring device, and air pollution control device.

These records must include, at a minimum, date, load levels and any manual adjustments, along with the reason for the adjustment (e.g., air to fuel ratio, timing or other settings).

- F. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a file of NO_x emissions from the turbines with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

g. i. Operational and Production Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the turbines.
- B. Pursuant to Construction Permit 95030010, the turbine DR31 shall not be operated for more than 5,040 hr/yr. [T1].
- C. Pursuant to Construction Permit 01100063, rated heat input capacity of the turbine Mars 41(EXC1) shall not exceed 112.5 mmBtu/hr. [T1]
- D. Pursuant to Construction Permit 01100063, the turbine Mars 41(EXC1) shall be equipped, operated and maintained with dry low-NO_x burners. [T1]

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the following items for the turbines:
- I. Type and the amount of fuel used on a monthly and annual basis.
- II. Operating hours for each turbine, hr/mo and hr/yr.
- III. Turbine rating for each unit, HP or mmBtu/hr.
- IV. Presence of the dry low-NO_x burner.

h. i. Work Practice Requirements

- A. Pursuant to 40 CFR 60.11(d), the Permittee shall, to the extent practicable, maintain and operate the turbines in a manner consistent with good air pollution control practice for minimizing emissions at all times including periods of startup, shutdown, and malfunction.

Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the IEPA or USEPA which may include, but not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of each turbine and associated auxiliary equipment.
- B. Pursuant to Sections 39.5(7)(b) and 39.5(7)(d) of the Act, the Permittee must conduct annual calibration and maintenance on each turbine as specified in the source's Maintenance Plan. This calibration and maintenance is

performed for, but is not limited to, fuel pressures, suction and discharge pressures, engine speed, gas and air temperatures, gas meters, air filters and hydraulic pressures.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records to demonstrate compliance with the applicable requirements described above and the source-wide Conditions 3.4(a)(i) and 8.1.
- I. Records of each inspection performed along with a maintenance and repair log for the turbines. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of any maintenance and repair activities that resulted in a modification or reconstruction of any piece of equipment.
- II. Records of annual calibration and maintenance performed on each turbine.

3. Non-Applicability Requirements

- a. The turbines are not subject to the NSPS for Stationary Combustion Turbines, 40 CFR Part 60 Subpart KKKK, either because the turbines commenced construction, modification, or reconstruction prior to February 18, 2005 (for Turbines OC5, OC6, OC7, SC24, and SC26) or their heat input at peak load is less than 10.7 gigajoules (10 mmBtu) per hour (for Turbines SC21, SC22, SC23, and SC25), based on the higher heating value of the fuel, pursuant to 40 CFR 60.4305(a).
- b. The turbines are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines, 40 CFR Part 63 Subpart YYYY, because these turbines are located at a minor source for HAPs.
- c. The turbines are not subject to 35 IAC 212.321, because these turbines do not have a process weight rate as defined in 35 IAC 211.5250 so that such rules cannot reasonably be applied, pursuant to 35 IAC 212.323.
- d. The turbines are not subject to 35 IAC 215.301, because these turbines do not use organic material that would make them subject to 35 IAC 215.301.
- e. The turbines are not subject to 35 IAC 216.121, because these turbines are not a fuel combustion emission unit as defined by 35 IAC 211.2470.
- f. The turbines are not subject to 35 IAC Part 217 Subpart Q, because these turbines are not located in the areas given in 35 IAC 217.386(a)(2).
- g. The turbines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these turbines do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

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

a. Operational Flexibility Requirements

- i. Pursuant to Sections 39.5(7)(a) of the Act, the Permittee is authorized to make the following physical or operational change with respect to a turbine without prior

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notification to the IEPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- A. The Permittee may refurbish the combustion unit on a turbine or replace it with a similar unit consistent with the Permittee's historic practice with respect to repair of the turbine. This authorization does not extend to changes that are intended to increase the power output of a turbine.

5. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), 4.2.2(d)(i), 4.2.2(e)(i), 4.2.2(f)(i), 4.2.2(g)(i), and 4.2.2(h)(i).
 - II. Requirements in Conditions 4.2.4(a)(i) and 4.2.4(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the information required in Condition 3.5(a)(iii).

4.3 Turbines (Mars 51, SC27, and SC28)

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|--|---|-----------------------------------|--|--|---------------------------|
| One 15,000 HP output/112.0 mmBtu/hr heat input rate of Natural Gas-Fired Solar Mars Turbine (Mars 51) | PM, SO ₂ , VOM, CO, NO _x , HAPs | Feb. 2005 | N/A | Low-NO _x Combustor | None |
| Two 10,011 HP output/95.23 mmBtu/hr heat input rate of Natural Gas-Fired Solar Compressor Turbines (SC27 and SC28) | PM, SO ₂ , VOM, CO, NO _x , HAPs | Oct. 2008 | N/A | Lean Pre-mix Low-NO _x Combustion Technology | None |

2. Applicable Requirements

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

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30%, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7) (b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each turbine in accordance with Method 22 for visible emissions at least once every calendar year in which the equipment operates. If visible emissions greater than 30% are observed, the Permittee shall take corrective action within four hours of such observation. Corrective action may include, but not limited to, shut down of the engine, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within seven days in accordance with Condition 2.4.

Recordkeeping

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

I. Records of 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 four hours of the observation.

II. Records of all Method 9 opacity measurements made in accordance with Condition 4.3.2(a) (ii) (A).

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b. i. Particulate Matter (PM) Requirements

- A. Pursuant to Construction Permit 04080010, emissions of PM from the turbine Mars 51 shall not exceed 14.23 lb/hr and 3.25 tons/yr. [T1]
- B. Pursuant to Construction Permit 08060057, emissions of PM from each of the turbines SC27 and SC28 shall not exceed 1.2 lb/hr. Emissions of PM from both turbines SC27 and SC28 combined shall not exceed 8.5 tons/yr. [T1]

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to Construction Permits 04080010 and 08060057, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a file of PM emissions from the turbines with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

c. i. Sulfur Dioxide (SO₂) Requirements

- A. Pursuant to 40 CFR 60.4305, the turbines are subject to the NSPS for Stationary Gas Turbines, 40 CFR Part 60 Subpart KKKK, because these turbines have a heat input at peak load equal to or greater than 10.7 gigajoules (10 mmBtu) per hour, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005.

I. Standard for Sulfur Dioxide

Pursuant to 40 CFR 60.4330(a), the Permittee must comply with the following SO₂ emission limit:

- 1. The Permittee must not cause to be discharged into the atmosphere from the subject stationary combustion turbine any gases which contain SO₂ in excess of 110 nanograms per Joule (ng/J) (0.90 pounds per megawatt-hour (lb/MWh)) gross output; or
- 2. The Permittee must not burn in the turbines any fuel which contains total potential sulfur emissions in excess of 26 ng SO₂/J (0.060 lb SO₂/mmBtu) heat input.

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

- C. I. Pursuant to Construction Permit 04080010, emissions of SO₂ from the turbine Mars 51 shall not exceed 0.38 lb/hr and 1.67 tons/yr. [T1]
- II. Pursuant to Construction Permit 08060057, emissions of SO₂ from each of the turbines SC27 and SC28 shall not exceed 0.6 lb/hr. Emissions of SO₂ from both turbines SC27 and SC28 combined shall not exceed 4.3 tons/yr. [T1]

ii. Compliance Method (SO₂ Requirements)

Monitoring

- A. Pursuant to Construction Permits 04080010 and 08060057, compliance with the 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]
- B. Pursuant to 40 CFR 60.4360, the Permittee must monitor the total sulfur content of the natural gas being fired in the turbines, except as provided in Condition 4.3.2(c)(ii)(C). The sulfur content of the natural gas must be determined using total sulfur methods described in 4.3.2(c)(ii)(D). Alternatively, if the total sulfur content of the natural gas during the most recent performance test was less than half the limit specified in Condition 4.3.2(c)(i)(A)(I), ASTM D4084, D4810, D5504, or D6228, or Gas Processors Association Standard 2377 (incorporated by reference, see 40 CFR 60.17), which measure the major sulfur compounds, may be used.
- C. Pursuant to 40 CFR 60.4365, the Permittee may elect not to monitor the total sulfur content of the natural gas being fired in the turbines as specified in Condition 4.3.2(c)(ii)(B), if the fuel is demonstrated not to exceed potential sulfur emissions of 26 ng SO₂/J (0.060 lb SO₂/mmBtu) heat input for the turbines. The Permittee must use one of the following sources of information to make the required demonstration:
- I. The fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content for natural gas is 20 grains of sulfur or less per 100 standard cubic feet, has potential sulfur emissions of less than 26 ng SO₂/J (0.060 lb SO₂/mmBtu) heat input; or
- II. Representative fuel sampling data which show that the sulfur content of the natural gas does not exceed 26 ng SO₂/J (0.060 lb SO₂/mmBtu) heat input. At a minimum, the amount of fuel sampling data specified in Section 2.3.1.4 or 2.3.2.4 of Appendix D to 40 CFR Part 75 is required.

Testing

- D. Pursuant to 40 CFR 60.4415, the Permittee must conduct SO₂ performance tests on an annual basis (no more than 14 calendar months following the previous performance test), using the methodologies specified in 40 CFR 60.4415(a)(1), (2), or (3).
- Pursuant to 40 CFR 60.4415(a)(1), if the Permittee choose to periodically determine the sulfur content of the fuel (i.e., natural gas) combusted in the turbines, a representative fuel sample shall be collected following ASTM D5287 (see 40 CFR 60.17). The fuel analyses may be performed either by the Permittee, a service contractor retained by the Permittee, the fuel vendor, or any other qualified agency. Analyze the samples for the total sulfur content of the fuel using ASTM D1072, or alternatively D3246, D4084, D4468, D4810, D6228, D6667, or Gas Processors Association Standard 2377 (see 40 CFR 60.17).
- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall comply with all the testing requirements of Conditions 2.4 and 7.1 of this permit.

Recordkeeping

- F. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records:
 - I. The heat and sulfur content of the fuels fired in the turbines, with supporting documentation.
 - II. Records of the SO₂ performance tests in Condition 4.3.2(c)(ii)(D).
 - III. Records of SO₂ emissions from the turbines with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

d. i. Volatile Organic Material (VOM) Requirements

- A. Pursuant to Construction Permit 04080010, emissions of VOM from the turbine Mars 51 shall not exceed 4.29 lb/hr and 18.83 tons/yr. [T1]
- B. Pursuant to Construction Permits 08060057, emissions of VOM from the turbines SC27 and SC28 shall not exceed the following limits: [T1]

| <u>Affected Turbine(s)</u> | <u>Lb/Hour</u> | | | <u>Tons/Year</u> |
|----------------------------|--------------------------|-----|-----|------------------|
| | <u>Mode of Operation</u> | | | |
| | I | II | III | |
| SC27 or SC28, individual | 2.6 | 5.8 | 8.7 | N/A |
| SC27 and SC28, total | N/A | | | 13.2 |

The hourly emissions from an individual turbine SC27 or SC28 are limited on the base of three different modes of operation: I indicates the mode of standard operation; II indicates the operation in cold weather mode (i.e., ambient temperature less than less than 0°F and 50% load or greater); and III indicates the operation in low-load mode (i.e., less than 50% load) and very cold weather mode (i.e., less than -20°F).

ii. Compliance Method (VOM Requirements)

Monitoring

- A. Pursuant to Construction Permits 04080010 and 08060057, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a file of VOM emissions from the turbines with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

e. i. Carbon Monoxide (CO) Requirements

- A. Pursuant to Construction Permit 04080010, emissions of CO from the turbine Mars 51 shall not exceed 13.88 lb/hr and 60.83 tons/yr. [T1]
- B. Pursuant to Construction Permits 08060057, emissions of CO from the turbines SC27 and SC28 shall not exceed the following limits: [T1]

| <u>Affected Turbine(s)</u> | <u>Lb/Hour</u> | | | <u>Tons/Year</u> |
|----------------------------|-------------------|-------|------|------------------|
| | Mode of Operation | | | |
| SC27 or SC28, individual | I | II | III | N/A |
| | 4.6 | 20.33 | 30.5 | |
| SC27 and SC28, total | N/A | | | 46.1 |

The hourly emissions from individual turbine SC27 or SC28 are limited on the base of three different modes of operation: I indicates the mode of standard operation; II indicates the operation in cold weather mode (i.e., ambient temperature less than less than 0°F and 50% load or greater); and III indicates the operation in low-load mode (i.e., less than 50% load) and very cold weather mode (i.e., less than -20°F).

ii. Compliance Method (CO Requirements)

Monitoring

A. Pursuant to Construction Permits 04080010 and 08060057, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a file of CO emissions from the turbines with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

f. i. Nitrogen Oxide (NO_x) Requirements

A. Pursuant to 40 CFR 60.4305, the turbines are subject to the NSPS for Stationary Gas Turbines, 40 CFR Part 60 Subpart KKKK, because these turbines have a heat input at peak load equal to or greater than 10.7 gigajoules (10 mmBtu) per hour, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005.

I. Standard for Nitrogen Oxides

Pursuant to 40 CFR 60.4320(a), the Permittee must comply with the nitrogen oxides (NO_x) emission standards specified in Table 1 of 40 CFR Part 60 Subpart KKKK as follows:

NO_x emission from new natural gas-fired turbines with a heat input at peak load between 50 mmBtu/hr and 850 mmBtu/hr shall not exceed 25 ppm at 15% O₂ or 150 ng/J of useful output (1.2 lb/MWh).

B. Pursuant to Construction Permit 04080010, emissions of NO_x from the turbine Mars 51 shall not exceed 8.99 lb/hr and 39.4 tons/yr. [T1]

C. Pursuant to Construction Permits 08060057, emissions of NO_x from the turbines SC27 and SC28 shall not exceed the following limits: [T1]

| <u>Affected Turbine(s)</u> | <u>Lb/Hour</u> | | | <u>Tons/Year</u> |
|----------------------------|-------------------|------|------|------------------|
| | Mode of Operation | | | |
| SC27 or SC28, individual | I | II | III | N/A |
| | 4.5 | 14.1 | 40.1 | |
| SC27 and SC28, total | N/A | | | 32.0 |

The hourly emissions from individual turbine SC27 or SC28 are limited on the base of three different modes of operation: I indicates the mode of standard operation; II indicates the operation in cold weather mode (i.e., ambient temperature less than less than 0°F and 50% load or greater); and III indicates the operation in low-load mode (i.e., less than 50% load) and very cold weather mode (i.e., less than -20°F).

ii. Compliance Method (NO_x Requirements)

Monitoring

- A. Pursuant to Construction Permits 04080010 and 08060057, compliance with the 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]

Testing

- B. Pursuant to 40 CFR 60.4340(a), the Permittee must perform annual performance tests in accordance with 40 CFR 60.4400 to demonstrate continuous compliance for NO_x. If the NO_x emission result from the performance test is less than or equal to 75% of the NO_x emission limit for the turbine, the Permittee may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75% of the NO_x emission limit for the turbine, the Permittee must resume annual performance tests.
- C. Pursuant to 40 CFR 60.4400, the Permittee must comply with the following requirements for the NO_x performance tests:
- I. Pursuant to 40 CFR 60.4400(a), the Permittee shall conduct the NO_x performance tests for the turbines on an annual basis (no more than 14 calendar months following the previous performance test), using the methods and procedures described therein.
- II. Pursuant to 40 CFR 60.4400(b), the performance test must be done at any load condition within plus or minus 25% of 100% of peak load. The Permittee may perform testing at the highest achievable load point, if at least 75% of peak load cannot be achieved in practice. The Permittee must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes.
- III. Pursuant to 40 CFR 60.4400(b)(4), compliance with the NO_x emission limit in Condition 4.3.2(f)(i)(A) must be demonstrated at each tested load level. Compliance is achieved if the three-run arithmetic average NO_x emission rate at each tested level meets the emission limit in Condition 4.3.2(f)(i)(A).
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee also shall comply with all the testing requirements of Conditions 2.4 and 7.1 of this permit.

Recordkeeping

- F. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records:
- I. The NO_x performance tests performed for the turbines, including, at a minimum, the test protocol and the test report.

II. The NO_x emissions from the turbines with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

g. i. Operational and Production Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the affected turbines.
- B. Pursuant to Construction Permit 04080010, for the turbine Mars 51, the rated heat input capacity shall not exceed 112.0 mmBtu/hr. [T1]
- C. Pursuant to Construction Permit 08060057, for the turbines SC27 and SC28, the following operational and requirements are established: [T1]
 - I. The rated output of each turbine shall not exceed 10,011 HP, at ISO conditions.
 - II.
 - 1. The turbines shall not operate for more than 14,220 engine-hours per year, total.
 - 2. The turbines shall not operate for more than 4,535 engine-hours per year, total, in cold weather mode (i.e., ambient temperature less than less than 0°F and 50 percent load or greater).
 - 3. The turbines shall not operate for more than 1,590 engine-hours per year, total, in low-load mode (i.e., less than 50% load) and very cold weather mode (i.e., less than -20°F).

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b), the Permittee shall maintain records of the following items for the affected turbines:
 - I. Type and the amount of fuel used on a monthly and annual basis.
 - II. Turbine ratings, HP or mmBtu/hr.
 - III. An operating log including the operating hours for each affected turbine (hr/mo, hr/yr) with mode of operation, i.e. standard, cold weather, or very cold weather.

h. i. Work Practice Requirements

- A. Pursuant to 40 CFR 60.4333, the Permittee must operate and maintain the affected turbines, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of each turbine and associated auxiliary equipment.

Recordkeeping

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

3. Non-Applicability Requirements

- a. The turbines are not subject to the New Source Performance Standards (NSPS) for Stationary Gas Turbines, 40 CFR Part 60 Subpart GG, because these turbines are subject to the NSPS for Stationary Combustion Turbines, 40 CFR Part 60 Subpart KKKK, pursuant to 40 CFR 60.4305(b).
- b. The turbines are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines, 40 CFR Part 63 Subpart YYYY, because these turbines are located at a minor source for HAPs.
- c. The turbines are not subject to 35 IAC 212.321, because these turbines do not have a process weight rate as defined in 35 IAC 211.5250 so that such rules cannot reasonably be applied, pursuant to 35 IAC 212.323.
- d. The turbines are not subject to 35 IAC 215.301, because these turbines do not use organic material that would make them subject to 35 IAC 215.301.
- e. The turbines are not subject to 35 IAC 216.121, because these turbines are not a fuel combustion emission unit as defined by 35 IAC 211.2470.
- f. The turbines are not subject to 35 IAC Part 217 Subpart Q, because these turbines are not located in the areas given in 35 IAC 217.386(a)(2).
- g. The turbines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these turbines do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

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

a. Start-up, Shutdown, and Malfunction Breakdown Requirements

i. Authorization for State Requirements

A. Start-up Requirements

Pursuant to 35 IAC 201.149, 201.161, 201.262 and Construction Permit 08060057, the Permittee is authorized to operate the turbines SC27 and SC28 in violation of the applicable opacity standards in Condition 4.3.2(a)(i)(A) during startup subject to the following provisions, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups:

- I. This authorization only extends for a period of up to 12 minutes following initial firing of fuel during each startup event. As provided by 35 IAC 201.265, this authorization does not shield the Permittee from enforcement for any such violation and shall only

constitute a prima facie defense to such an enforcement action provided that the Permittee has fully complied with all associated terms and conditions.

- II. To minimize startup emissions, the duration of startups, and the frequency of startups, the Permittee shall conduct startup of the turbines SC27 and SC28 in accordance with the manufacturer's written instructions or other written instructions prepared and maintained on site and which shall include, at a minimum, review of the operational condition of turbines prior to initiating startup of the turbine and review of the operating parameters of turbines during each startup to make appropriate adjustments to the startup to reduce or eliminate excess emissions.
- III. Any startup that does not meet the requirements of Conditions 4.3.4(a)(i)(A)(I) and (II) shall be considered a deviation so that the reporting requirements in Condition 3.5 shall apply. The report shall include a description of the deviation, the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of steps taken to reduce emissions and future occurrences.

ii. Compliance Method (Start-up Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, in addition to compliance with all applicable requirements in Section 7.5 of this permit, the Permittee shall maintain the following records:
 - I. Records of the Source's established startup procedures for the subject turbines.
 - II. Records for each startup of the subject turbines, including date and description of startup, e.g., startup following scheduled maintenance outage.
 - III. The total number of startups, malfunctions, and breakdowns per month and per year.
 - IV. Manufacturer's data for the turbine including emissions guarantees, horsepower or rated heat input capacity (mmBtu/hour), and operating and maintenance procedures suggested by the manufacturer.

b. Operational Flexibility Requirements

- i. Pursuant to Construction Permit 08040057, the following operation flexibility requirements are established for the turbines SC27 and SC28: [T1]
 - A. This permit authorizes installation of manufacturer supplied replacement turbine or turbine components for the turbines, that takes place either as part of scheduled maintenance of the turbine or in the event of malfunction or unscheduled outage and subsequent repairs. This authorization does not address activities for which a construction permit is not required, such as routine preventive maintenance, minor replacement of turbine components, or activities that do not involve, either directly or indirectly, emission-related components or activities that do not involve, either directly or indirectly, emission-related components or assemblies of the turbines.
 - B. This authorization is limited to activities that can be accommodated by the original installation of an affected turbine and that are performed in

conjunction with an ongoing program of maintenance, repair, and replacement, so as to not constitute a modification of the turbine with respect to the PSD or NSPS. The replacement turbine or turbine components must be in good operating condition and come from either the manufacturer or authorized dealer/service provider. This authorization does not extend to installation of a replacement turbine that is a different make and model than the original turbine or to activities that are intended to, or would have the result of, increasing the design capacity of the affected turbine.

- C. This authorization does not address activities for which a construction permit is not required, such as routine preventive maintenance, minor replacement of turbine components or assemblies, or activities that do not involve, either directly or indirectly, emission-related components or activities that do not involve, either directly or indirectly, emission-related components or assemblies of the turbine.
- D. I. This authorization does not relax or otherwise revise any requirements and conditions that apply to the operation of the affected turbines, including applicable emission limits, monitoring, testing, recordkeeping, and reporting requirements of this permit, which shall continue to apply to the affected turbine.
II. This authorization also does not excuse the Permittee from any new regulatory requirements that are adopted and applicable to the affected turbine
- E. The Permittee shall expeditiously have performance testing conducted on an affected turbine following replacement of the turbine, as required pursuant to the NSPS, 40 CFR 60 Subpart A and KKKK, if requested by the IEPA or USEPA.
- F. I. The Permittee shall maintain following records at the source for the replacement activities authorized by this permit:
 - 1. A file containing the paperwork for original and replacement turbine or turbine components, including documentation for turbine model numbers, manufacturers date, serial numbers, and copies of the specifications for replacements.
 - 2. Details of activities performed pursuant to this permit including, date that the turbine is removed from the service and the date the turbine is returned to service.II. Notwithstanding the provisions of the CAAPP permit, the records required by Condition 4.3.4(b)(i)(F) shall be retained for at least five years after the date that the turbine is permanently removed from the service.
- G. The Permittee shall notify the IEPA prior to carrying out activities pursuant to this Condition 4.3.4(b). This notification shall be submitted at least 15 days in advance or as soon as it is practicable to do so, e.g., in the event of turbine failure. This notification shall include:
 - I. A description of the activities that are to be performed and the expected schedule for the activities.
 - II. A confirmation that the activities fall within the authorization provided by this permit, the replacement is or will be in good operating conditions, and the outage of a turbine will not prevent or interfere with compliance with applicable requirements for control of emissions, with supporting information.

- H. The authorization provided by Condition 4.3.4(b) for each affected turbine will terminate when the turbine is permanently removed from service or 30 days after notification from the IEPA that this authorization is being terminated, whichever occurs first. As related to the replacement activities authorized by this permit, this condition supersedes Standard Condition 1 in Standard Conditions for Construction/Development Permits issued by the IEPA (APC-166).

5. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.3.2(a)(i), 4.3.2(b)(i), 4.3.2(c)(i), 4.3.2(d)(i), 4.3.2(e)(i), 4.3.2(f)(i), 4.3.2(g)(i), and 4.3.2(h)(i).
- II. Requirements in Conditions 4.3.4(a)(i) and 4.3.4(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the information required in Condition 3.5(a)(iii).

4.4 Engines

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|--|---|-----------------------------------|--|--|---------------------------|
| Two 1,000 HP output/8.0 mmBtu/hr heat input rate of Natural Gas-Fired SI 2SLB Engines for Cooper Compressors #3 and #4 (CC3 and CC4) | PM, SO ₂ , VOM, CO, NO _x , HAPs | Jan. 1960 | N/A | None | None |
| One 500 HP output/4.0 mmBtu/hr heat input rate of Natural Gas-Fired SI 4SRB Engine for Station Generator #2 (SG2) | PM, SO ₂ , VOM, CO, NO _x , HAPs | Apr. 1994 | N/A | None | None |
| One 310 HP output/2.5 mmBtu/hr heat input rate of Natural Gas-Fired SI 4SRB Engine for Station Generator #3 (SG3) | PM, SO ₂ , VOM, CO, NO _x , HAPs | Jun. 1982 | N/A | None | None |
| Three 225 HP output/1.8 mmBtu/hr heat input rate of Natural Gas-Fired SI 4SRB Engine for Station Generators #5, #6, and #7 (CG5, CG6, and CG7) | PM, SO ₂ , VOM, CO, NO _x , HAPs | Jan. 1965 | N/A | None | None |
| One 814 HP output/6.1 mmBtu/hr heat input rate of Natural Gas-Fired SI 4SLB Engine for Station Generator #4 (SG4) | PM, SO ₂ , VOM, CO, NO _x , HAPs | Dec. 2002 | Sep. 2004 | None | None |
| One 637 HP output/5.9 mmBtu/hr heat input rate of Natural Gas-Fired SI 4SLB Engine for Station Generator #1 (SG1) | PM, SO ₂ , VOM, CO, NO _x , HAPs | Sep. 2005 | 2007 | None | None |

2. Applicable Requirements

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

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30%, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each engine in accordance with Method 22 for visible emissions at least once every calendar year in which the equipment operates. If visible emissions greater than 30% are observed, the Permittee shall take corrective action within four hours of such observation. Corrective action may include, but 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

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up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within seven days in accordance with Condition 2.4.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records:
 - I. Records of 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 four hours of the observation.
 - II. Records of all Method 9 opacity measurements made in accordance with Condition 4.4.2(a)(ii)(A).

b. i. Sulfur Dioxide (SO₂) Requirements

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

ii. Compliance Method (SO₂ Requirements)

- A. The periodic monitoring requirements sufficient to meet Section 39.5(7)(d)(ii) of the Act are addressed by the operational and production requirements in Condition 4.4.2(f) and the work practice requirements in Condition 4.4.2(g).

c. i. Volatile Organic Material (VOM) Requirements

- A. Pursuant to Construction Permit 05060044, emissions of VOM from the engine SG1 shall not exceed 0.83 grams/BHP-hr and 4.3 tons/yr. [T1]
- B. Pursuant to Construction Permit 01100063, emissions of VOM from the engine SG4 shall not exceed 0.15 lb/hr and 0.52 tons/yr. [T1]

ii. Compliance Method (VOM Requirements)

Monitoring

- A. Pursuant to Construction Permits 05060044 and 01100063, for the engines SG1 and SG4, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a file of VOM emissions from the affected engines with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

d. i. Carbon Monoxide (CO) Requirements

- A. Pursuant to Construction Permit 05060044, emissions of CO from the engine SG1 shall not exceed 1.46 grams/BHP-hr and 7.7 tons/yr. [T1]
- B. Pursuant to Construction Permit 01100063, emissions of CO from the engine SG4 shall not exceed 3.84 lb/hr and 13.45 tons/yr. [T1]

ii. Compliance Method (CO Requirements)

Monitoring

- A. Pursuant to Construction Permits 05060044 and 01100063, for engines SG1 and SG4, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a file of CO emissions from the affected engines with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

e. i. Nitrogen Oxide (NO_x) Requirements

- A. Pursuant to Construction Permit 05060044, emissions of NO_x from the engine SG1 shall not exceed 5.94 grams/BHP-hr and 31.2 tons/yr. [T1]
- B. Pursuant to Construction Permit 01100063, the following NO_x emission limits are established: [T1]
 - I. Hourly emissions of NO_x from the engine SG4 shall not exceed 1.4 gr/BHP-hr.
 - II. Emissions of NO_x from the engine SG4 shall not exceed 2.07 lb/hr and 7.24 tons/yr.
 - III. These requirements shall not take effect until the advanced fuel/air controls have been installed.
- C. Pursuant to Section 39.5(7)(a) of the Act and Permit 95120023, emissions of NO_x from the engines SG1, SG2, and SG3 shall not exceed 39.0 tons/yr. [T1]

ii. Compliance Method (NO_x Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(b) of the Act, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a file of NO_x emissions from the affected engines with supporting calculations on a monthly and annual basis, tons/mo and tons/yr.

f. i. Operational and Production Requirements

- A. Pursuant to 40 CFR 63.6585, the affected engines are subject to the NESHAP for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63 Subpart ZZZZ, because they are operated at an area source of HAP emissions.
- B. Pursuant to 40 CFR 63.6603(a), the Permittee must comply with the requirements in Table 2d to 40 CFR Part 63 Subpart ZZZZ as follows:
- I. For the existing non-emergency, non-black start 2SLB stationary RICE CC3 and CC4, the Permittee must comply with the requirements specified in Item 6 of Table 2d to 40 CFR Part 63 Subpart ZZZZ as follows:
1. Change oil and filter every 4,320 hours of operation or annually, whichever comes first, except that the Permittee has elected the option of utilizing an oil analysis program to extend the oil change period requirement described in Condition 4.4.2(f)(i)(E);
 2. Inspect spark plugs every 4,320 hours of operation or annually, whichever comes first, and replace as necessary; and
 3. Inspect all hoses and belts every 4,320 hours of operation or annually, whichever comes first, and replace as necessary.
- II. For the existing non-emergency, non-black start 4SLB remote stationary RICE SG1 and SG4, the Permittee must comply with the requirements specified in Item 8 of Table 2d to 40 CFR Part 63 Subpart ZZZZ as follows:
1. Change oil and filter every 2,160 hours of operation or annually, whichever comes first, except that the Permittee has elected the option of utilizing an oil analysis program to extend the oil change period requirement described in Condition 4.4.2(f)(i)(E);
 2. Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary; and
 3. Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.
- III. For the existing non-emergency, non-black start 4SRB stationary RICE (≤ 500 HP) SG2, SG3, CG5, CG6, and CG7, the Permittee must comply with the requirements specified in Item 10 of Table 2d to 40 CFR Part 63 Subpart ZZZZ as follows:
1. Change oil and filter every 1,440 hours of operation or annually, whichever comes first, except that the Permittee has elected the option of utilizing an oil analysis program to extend the oil change period requirement described in Condition 4.4.2(f)(i)(E);
 2. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and
 3. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.

- C. Pursuant to 40 CFR 63.6603(f), the Permittee must evaluate the status of the affected engines SG1 and SG4 every 12 months to meet the definition of remote stationary RICE in 40 CFR 63.6675. The Permittee must keep records of the initial and annual evaluation of the status of these engines. If the evaluation indicates that they no longer meet the definition of remote stationary RICE in 40 CFR 63.6675, the Permittee must comply with all of the requirements for existing non-emergency SI 4SLB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE within 1 year of the evaluation.
- D. Pursuant to 63.6625(e), the Permittee must operate and maintain the stationary RICE CC3, CC4, SG2, SG3, CG5, CG6, and CG7 according to the manufacturer's emission-related written instructions or develop the Permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practice for minimizing emissions.
- E. Pursuant to 63.6625(j), the Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement of Conditions 4.4.2(f)(i)(B)(I)(1), 4.4.2(f)(i)(B)(II)(1), and 4.4.2(f)(i)(B)(III)(1). The oil analysis must be performed at the same frequency specified for changing the oil in Conditions 4.4.2(f)(i)(B)(I)(1), 4.4.2(f)(i)(B)(II)(1), and 4.4.2(f)(i)(B)(III)(1). The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.
- F. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the affected engines.
- G. I. Pursuant to Construction Permit 05060044, the affected engine SG1 shall not be operated more than 7,500 hr/yr. [T1]
- II. Pursuant to Construction Permit 01100063, the affected engine SG4 shall only be operated for 7,000 hr/yr. [T1]
- ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to 40 CFR 63.6660, the following recordkeeping requirements are established:
- I. The Source's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).

- II. As specified in 40 CFR 63.10(b)(1), the Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
 - III. The Permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1).
- B. Pursuant to 40 CFR 63.6655 and Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the following items for the engines:
- I. Records of all such required maintenance performed on the air pollution control as specified in Condition 4.4.2(f)(i)(B).
 - II. Records of the initial and annual evaluation of the status of the affected engines in Condition 4.4.2(f)(i)(C).
 - III. Records of the maintenance conducted on the affected engines as those specified in Condition 4.4.2(f)(i)(D).
 - IV. Reports of the oil analysis (if chosen) described in Condition 4.4.2(f)(i)(E).
 - V. The type and the amount of fuel used on a monthly and annual basis.
 - VI. Operating hours of each engine, hr/mo and hr/yr.

g. i. Work Practice Requirements

- A. Pursuant to 40 CFR 63.6605, the Permittee must, at all times, operate and maintain any affected engines, including associated auxiliary equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.
- B. Pursuant to 40 CFR 63.6640(a), the Permittee must continuously comply with the following work practices as required in Item 9(a)(i) and (ii) of Table 6 to 40 CFR Part 63 Subpart ZZZZ:
 - I. The Permittee shall operate and maintain each affected engine according to the manufacturer's emission-related operation and maintenance instructions; or
 - II. The Permittee shall develop and follow the Permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform quarterly inspections of each engine and associated auxiliary equipment.

Recordkeeping

- B. Pursuant to 40 CFR 63.6655, the Permittee must keep records of the following items for the engines:

- I. A copy of each notification and report that the Permittee submitted to comply with 40 CFR Part 63 Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that the Permittee submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).
 - II. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
 - III. Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).
 - IV. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process to its normal or usual manner of operation.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee also shall keep records of the following items:
- I. Records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of any maintenance and repair activities that resulted in a modification or reconstruction of the piece of equipment.
 - II. Records of monthly and annual PM, and SO₂ emissions with supporting calculations for the engines to demonstrate compliance with Condition 8.1.

3. Non-Applicability Determinations

- a. The engines are not subject to the New Source Performance Standards (NSPS) for Stationary Spark Ignition Combustion Engines, 40 CFR Part 60 Subpart JJJJ, because these engines commenced construction, modification, or reconstruction prior to June 12, 2006 pursuant to 40 CFR 60.4230(a)(4).
- b. The engines are not subject to 35 IAC 212.321 or 212.322, because these engines do not have a process weight rate as defined in 35 IAC 211.5250 so that such rules cannot reasonably be applied, pursuant to 35 IAC 212.323.
- c. The engines are not subject to 35 IAC 215.301, because the engines do not use organic material that would make them subject to 35 IAC 215.301.
- d. The engines are not subject to 35 IAC 216.121, because the engines are not fuel combustion emission units as defined by 35 IAC 211.2470.
- e. The engines are not subject to 35 IAC Part 217 Subpart Q, because neither are these engines listed in Appendix of 35 IAC Part 217, nor located in the areas given in 35 IAC 217.386(a)(2).
- f. The engines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for all pollutants, because these engines do not use an add-on control device to achieve compliance with an emission limitation or standard.

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4. Other Requirements

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

a. Start-up, Shutdown, and Malfunction Breakdown Requirements

i. Authorization for State Requirements

A. Start-up Requirements

Pursuant to 35 IAC 201.149, 201.161, and 201.262, the Permittee is authorized to operate the engines during startup with opacity in violation of Condition 4.4.2(a)(i)(A) (30 percent opacity) during startup, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups. This authorization is subject to the following:

- I. This authorization only extends for a period of up two-hours following initial firing of natural gas during each event for the engine.
- II. The Permittee shall take the following measures to minimize startup emissions, the duration of startups, and the frequency of startups:

Implement established startup procedures, including preheating of the engine prior to startup when sufficient time is available.
- III. The Permittee shall comply with all applicable requirements in Section 7.5 of this permit.

5. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.4.2(a)(i), 4.4.2(b)(i), 4.4.2(c)(i), 4.4.2(d)(i), 4.4.2(e)(i), 4.4.2(f)(i), and 4.4.2(g)(i).
 - II. Requirements in Condition 4.4.4(a)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the information required in Condition 3.5(a)(iii).

b. Federal Reporting

- i. Pursuant to 40 CFR 63.6645(a), the Permittee must submit all of the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b) through (e), (g), and (h).
- ii. Pursuant to 40 CFR 63.6640(b), the Permittee must report each instance in which the Permittee did not meet each applicable emission limitation or operating limitation in Table 2d to 40 CFR Part 63 Subpart ZZZZ. These instances are deviations from the emission and operating limitations under 40 CFR Part 63 Subpart ZZZZ. These deviations must be reported according to the requirements in 40 CFR 63.6650.
 - A. Pursuant to 40 CFR 63.6650(c), the Compliance report must contain the information of the following items:
 - I. Company name and address.
 - II. Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - III. Date of report and beginning and ending dates of the reporting period.
 - IV. If the Permittee had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the Permittee during a malfunction of an affected engine to minimize emissions in accordance with 40 CFR 63.6605(b), including actions taken to correct a malfunction.
 - V. If there are no deviations from any emission or operating limitations that apply to the Permittee, a statement that there were no deviations from the emission or operating limitations during the reporting period.
 - VI. If there were no periods during which the continuous monitoring system (CMS), if any including CEMS and CPMS, was out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.
 - B. Pursuant to 40 CFR 63.6650(d), for each deviation from an emission or operating limitation that occurs for a stationary RICE where the Permittee is not using a CMS to comply with the emission or operating limitations in 40 CFR Part 63 Subpart ZZZZ, the Compliance report must contain the information in Condition 4.4.5(b)(ii)(A)(I) through (IV) above and the information of the following items:
 - I. The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
 - II. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

4.5 Dehydration Units

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|---|---|-----------------------------------|--|--|---------------------------|
| One National TEG Dehydration Unit Vapor Vent #1 at the main station (VV1 - Reboiler 5) | PM, SO ₂ , VOM, HAPs | 1960 | 2005 | Flare Stack #3 (FS3) | None |
| One Parkersburg TEG Dehydration Unit Vapor Vent #2 at the main station (VV2 - Reboiler 2) | PM, SO ₂ , VOM, HAPs | 1959 | 2004 | FS2 | None |
| One BS & B TEG Dehydration Unit Vapor Vent #3 at the main station (VV3 - Reboiler 3) | PM, SO ₂ , VOM, HAPs | 1964 | 2005 | FS3 | None |
| One Delta TEG Dehydration Unit Vapor Vent #4 at the main station (VV4 - Reboiler 4) | PM, SO ₂ , VOM, CO, NO _x , HAPs | 1960 | 2006 | FS2 | None |
| One Tulpro TEG Dehydration Unit Vapor Vent #5 at the main station (VV5 - Reboiler 1) | PM, SO ₂ , VOM, HAPs | 1994 | N/A | FS1 | None |
| One National TEG Dehydration Unit Vapor Vent #1 at the main station (VV6 - Reboiler 9) | PM, SO ₂ , VOM, CO, NO _x , HAPs | 2002 | N/A | FS4 | None |
| One TEG Dehydration Unit Vapor Vent #1 at the north station (VV1N - Reboiler 8) | PM, SO ₂ , VOM, HAPs | 1994 | N/A | FS1N | None |
| One TEG Dehydration Unit Vapor Vent #2 at the north station (VV2N - Reboiler 7) | PM, SO ₂ , VOM, HAPs | 2004 | N/A | FS2N | None |
| One TEG Dehydration Unit Vapor Vent #3 at the north station (VV3N - Reboiler 6) | PM, SO ₂ , VOM, HAPs | 1995 | 1999 | FS2N | None |
| One TEG Dehydration Unit Vapor Vent #4 at the north station (VV4N - Reboiler 10) | PM, SO ₂ , VOM, CO, NO _x , HAPs | 2002 | N/A | FS3N | None |

2. Applicable Requirements

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

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30%, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each TEG dehydration unit in accordance with Method 22 for visible emissions at least once every calendar year in which the equipment operates. If visible emissions greater

than 30% are observed, the Permittee shall take corrective action within four hours of such observation. Corrective action may include, but not limited to, shut down of the unit and the associated reboiler, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within seven days in accordance with Condition 2.4.

Recordkeeping

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

I. Records of 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 four hours of the observation.

II. Records of all Method 9 opacity measurements made in accordance with Condition 4.5.2(a)(ii)(A).

b. i. Sulfur Dioxide (SO₂) Requirements

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

ii. Compliance Method (SO₂ Requirements)

A. The periodic monitoring requirements sufficient to meet Section 39.5(7)(d)(ii) of the Act are addressed by the operational and production requirements in Condition 4.5.2(d) and the work practice requirements in Condition 4.5.2(e).

c. i. Volatile Organic Material (VOM) Requirements

A. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission source, except as provided in 35 IAC 215.302, 215.303, 215.304.

B. I. Pursuant to Construction Permit 01100063, emissions of VOM from each of the flares FS4/VV6 (i.e., the flare connected to the vapor vent of the TEG dehydration unit VV6) and FS3N/VV4N shall not exceed 2.1 lb/hr. Emissions of VOM from the two combined shall not exceed 9.20 tons/yr. [T1]

II. Pursuant to Construction Permit 05060044, emissions of VOM from the flare FS2/VV4 shall not exceed 1.5 tons/mo and 8.85 tons/yr. [T1]

III. Pursuant to FESOP Permit 95040140, emissions of VOM from each of the flares FS1N/VV1N, FS2N/VV2N, and FS2N/VV3N shall not exceed 3.2 lb/hr and 10.8 tons/yr. [T1]

C. Pursuant to Section 39.5(7)(a) of the Act and Permit 95120023, emissions of VOM from all the TEG dehydration units except from FS2/VV4, FS4/VV6, and FS3N/VV4N shall not exceed 39.0 tons/yr. [T1]

ii. Compliance Method (VOM Requirements)

Monitoring

- A. Pursuant to Construction Permits 05060044 and 01100063, compliance with the 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]
- 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 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. Inputs to the model shall be representative of actual operating conditions of the TEG dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1).

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each calculation of VOM emissions performed on a monthly and annual basis, tons/mo and tons/yr. These records shall include, at a minimum: date the calculations were performed, the input parameters used, and the emissions from the TEG dehydration units with supporting documentation.
- D. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the TEG dehydration units are subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.7 and Table 7.7.1, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Owner or Operator shall maintain the monitoring, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

d. i. Carbon Monoxide (CO) Requirements

- A. I. Pursuant to Construction Permit 01100063, emissions of CO from each of the flares FS4/VV6 (i.e., the flare connected to the vapor vent of the TEG dehydration unit VV6) and FS3N/VV4N shall not exceed 0.4 lb/hr. Emissions of CO from the two combined shall not exceed 1.75 tons/yr. [T1]
- II. Pursuant to Construction Permit 05060044, emissions of CO from the flare FS2/VV4 shall not exceed 2.0 tons/mo and 11.7 tons/yr. [T1]
- III. Pursuant to Construction Permit 00110027, emissions of CO from each of the flares FS1/VV5, FS2/VV2, and FS3/VV1&VV3 shall not exceed 0.37 lb/hr and 1.62 tons/yr. [T1]

ii. Compliance Method (CO Requirements)

Monitoring

- A. Pursuant to Construction Permits 05060044 and 01100063, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each calculation of CO emissions performed on a monthly and annual basis, tons/mo and tons/yr. These records shall include, at a minimum: date the calculations were performed, the input parameters used, and the emissions from the TEG dehydration units with supporting documentation.

e. i. Nitrogen Oxide (NO_x) Requirements

- A. I. Pursuant to Construction Permit 01100063, emissions of NO_x from each of the flares FS4/VV6 (i.e., the flare connected to the vapor vent of the TEG dehydration unit VV6) and FS3N/VV4N shall not exceed 0.14 lb/hr. Emissions of NO_x from the two combined shall not exceed 0.64 tons/yr. [T1]
- II. Pursuant to Construction Permit 05060044, emissions of NO_x from the flare FS2/VV4 shall not exceed 0.1 tons/mo and 0.11 tons/yr. [T1]
- III. Pursuant to Construction Permit 00110027, emissions of NO_x from each of the flares FS1/VV5, FS2/VV2, and FS3/VV1&VV3 shall not exceed 0.08 lb/hr and 0.35 tons/yr. [T1]

ii. Compliance Method (NO_x Requirements)

Monitoring

- A. Pursuant to Construction Permits 05060044 and 01100063, compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each calculation of NO_x emissions performed on a monthly and annual basis, tons/mo and tons/yr. These records shall include, at a minimum: date the calculations were performed, the input parameters used, and the emissions from the TEG dehydration units with supporting documentation.

f. i. Operational and Production Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the reboilers of each TEG dehydration unit.

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the type of fuel fired in the reboiler of each TEG dehydration unit.

g. i. Work Practice Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the TEG dehydration units in a manner consistent with safety and good air pollution control practice for minimizing emissions.
- B. At all times, the Permittee shall, to the extent practicable, maintain and operate the flares in a manner consistent with good air pollution control

practice for minimizing emissions. For this purpose, the control efficiency of flare stacks is established as follows:

- I. Pursuant to the previously issued CAAPP Permit, the control efficiency of FS1/VV5, FS3/VV1&VV3, FS1N/VV1N, and FS2N/VV2N&VV3N shall achieve at least 85%. [T1]
 - II. Pursuant to Construction Permit 01100063, the control efficiency of FS4/VV6 and FS3N/VV4N shall achieve at least 98%. [T1]
 - III. Pursuant to Construction Permit 05060044, the control efficiency of FS2/VV2&VV4 shall achieve at least 98%. [T1]
 - C. Pursuant to Construction Permit 01100063, the maximum rated firing capacity of Reboilers #9 and #10 (associated with TEG units VV6 and VV4N) shall not exceed 1.0 mmBtu/hr. [T1]
 - D. Pursuant to Construction Permit 01100063, Reboiler #9 and #10 on VV6 and VV4N shall be designed to comply with a NO_x emission rate of 0.12 pounds per mmBtu.
- ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7)(a) of the Act, the Permittee shall continuously monitor the pilot flames on each flare by installing the pilot flame detection device to demonstrate that the flares operate at all times when the dehydration units are in operation.
- B. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of each dehydration unit and associated auxiliary equipment.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, and a description of any maintenance and repair activities that resulted in a modification or reconstruction of the piece of equipment.
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee also shall maintain the following records:
 - I. A file that includes:
 - 1. Design NO_x emission rate for each TEG unit associated reboiler.
 - 2. Maximum design capacity of the flares in mmBtu/hr heat input from the waste gas and pilot flame fuel.
 - II. The presence of the pilot flame detection devices and their maintenance or replacements if necessary.
 - III. Logs of maintenance of the flares, which demonstrate proper operation as required by Condition 4.5.2(g)(i)(B).

- IV. Records of monthly and annual emissions with supporting calculations of PM, and SO₂ from the affected reboilers and dehydration units to demonstrate compliance with Conditions 3.4(a)(i) and 8.1.

3. Non-Applicability Determinations

- a. The TEG dehydration units are not subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Natural Gas Transmission and Storage Facilities, 40 CFR 63 Subpart HHH, because these units are located in an existing local distribution company that transmits and stores natural gas.
- b. The TEG dehydration units are not subject to 35 IAC 212.321 or 212.322, because these units do not have a process weight rate as defined in 35 IAC 211.5250 so that such rules cannot reasonably be applied, pursuant to 35 IAC 212.323.
- c. The reboilers associated with the TEG dehydration units are not subject to 35 IAC 216.121, emissions of CO from fuel combustion emission units, because the heat input of each reboiler is less than 10 mmBtu/hr.

4. Other Requirements

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

a. Start-up, Shutdown, and Malfunction Breakdown Requirements

i. Authorization for State Requirements

A. Malfunction Breakdown Requirements

Pursuant to 35 IAC 201.149, 201.161, and 201.262, the source is authorized to continue operation of the TEG dehydration units without the flare in violation of the applicable requirements of Conditions 4.5.2(a)(i)(A), 4.5.2(b)(i)(A), 4.5.2(c)(i)(A) and (B), 4.5.2(d)(i)(A), and 4.5.2(e)(i)(A) during malfunction breakdown of the flare.

The Permittee shall comply with all applicable requirements in Section 7.6 of this permit.

- B. The Permittee shall remove the TEG dehydration units from service or repair the flare as soon as practicable. This shall be accomplished within three days unless the Permittee obtains an extension, from the Regional Office of the IEPA. The request for such extension must document that the flare is unavailable and specify a schedule of actions taken that will assure the feature(s) will be repaired or remove the affected dehydration units from services as soon as possible.

- C. The Permittee shall reduce operation of the TEG dehydration units to the extent that natural gas may reasonably be supplied from the Permittee's other storage fields.

5. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from

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applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

- I. Requirements in Conditions 4.5.2(a)(i), 4.5.2(b)(i), 4.5.2(c)(i), 4.5.2(d)(i), 4.5.2(e)(i), 4.5.2(f)(i), and 4.5.2(g)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the information required in Condition 3.5(a)(iii).

4.6 Heating Boilers (HB1, HB2, and HB3)

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|---|-----------------------------------|-----------------------------------|--|--|---------------------------|
| One 3.12 mmBtu/hr Natural Gas-Fired Boiler (HB1) | PM, HAPs | Pre-1995 | N/A | None | None |
| Two 2.52 mmBtu/hr Natural Gas-Fired Boilers (HB2 and HB3) | PM, HAPs | Pre-1995 | N/A | None | None |

2. Applicable Requirements

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

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30%, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each boiler in accordance with Method 22 for visible emissions at least once every calendar year in which the equipment operates. If visible emissions greater than 30% are observed, the Permittee shall take corrective action within four hours of such observation. Corrective action may include, but not limited to, shut down of the boiler, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within seven days in accordance with Condition 2.4.

Recordkeeping

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

I. Records of 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 four hours of the observation.

II. Records of all Method 9 opacity measurements made in accordance with Condition 4.6.2(a)(ii)(A).

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- b. i. Operational and Production Requirements
- A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the affected heating boilers.
- ii. Compliance Method (Operational and Production Requirements)
- Recordkeeping
- A. Pursuant to Section 39.5(7)(b), the Permittee shall maintain records of the type of fuel fired in the affected heating boilers.
- c. i. Work Practice Requirements
- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the affected heating boilers in a manner consistent with safety and good air pollution control practice for minimizing emissions.
- ii. Compliance Method (Work Practice Requirements)
- Monitoring
- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform quarterly inspections of the affected heating boilers and associated auxiliary equipment if in operation during that quarter.
- Recordkeeping
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, and a description of any maintenance and repair activities that resulted in a modification or reconstruction of the piece of equipment.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of monthly and annual emissions with supporting calculations of PM, SO₂, VOM, CO, and NO_x from the boilers to demonstrate compliance with Conditions 3.4(a)(i) and 8.1.

3. Non-Applicability Determinations

- a. The heating boilers are not subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc, because these boilers were constructed or reconstructed before June 9, 1989 pursuant to 40 CFR 60.40c(a).
- b. The heating boilers are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR Part 63 Subpart JJJJJJ, because these boilers are gas-fired pursuant to 40 CFR 63.11195(e).
- c. The heating boilers are not subject to 35 IAC 212.206 because these boilers do not use liquid fuel.
- d. The heating boilers are not subject to 35 IAC 214.161 because these boilers do not use liquid fuel.

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- e. The heating boilers are not subject to 35 IAC 215.301 and 215.302, because these provisions shall not apply to fuel combustion emission sources, pursuant to 35 IAC 215.303.
- f. The heating boilers are not subject to 35 IAC 216.121 because these boilers are less than 10 mmBtu/hr.
- g. The heating boilers are not subject to 35 IAC 217.141 because the actual heat input of each of these boilers is less than 250 mmBtu/hr and these boilers are not located in the Chicago or St. Louis (Illinois) major metropolitan areas.
- h. The heating boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

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

5. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.6.2(a)(i), 4.6.2(b)(i), and 4.6.2(c)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the information required in Condition 3.5(a)(iii).

4.7 Storage Tanks

1. Emission Units and Operations

| Emission Units | Pollutants Being Regulated | Original Construction Date | Modification/ Reconstruction Date | Air Pollution Control Devices or Measures | Monitoring Devices |
|--|----------------------------|----------------------------|-----------------------------------|---|--------------------|
| One 30,000 gallon methanol storage tank (M1) | VOM, HAPs | 1960 | N/A | None | None |
| One 2,000 gallon gasoline storage tank (UG1) | VOM, HAPs | 2002 | N/A | None | None |
| One 20,000 gallon methanol storage tank (M2) | VOM, HAPs | 2002 | N/A | None | None |
| Two 300 gallon methanol tanks | VOM, HAPs | Various | N/A | None | None |

2. Applicable Requirements

For the emission units in Condition 4.7.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Volatile Organic Material (VOM) Requirements

- A. Pursuant to 35 IAC 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to the provisions of 35 IAC 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2).
- B. Pursuant to 35 IAC 215.583(a)(1), 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 tank is equipped with a submerged loading pipe.

ii. Compliance Method (VOM Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b), the Permittee shall maintain records of the following items for the affected storage tanks:
 - I. The presence of the submerged loading pipe or the submerged loading fill.
 - II. The VOM emissions from each storage tank based on the materials stored, the tank throughputs, and the applicable emission factors and formulas with supporting calculations, ton/yr.

b. i. Work Practice Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the storage tanks in a manner consistent with safety and good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7)(b) of the Act, at a minimum, the Permittee shall perform annual inspections of the storage tanks and their associated auxiliary equipment.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections noting the presence of the submerged loading pipe, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall also maintain the following records for the affected storage tanks:
- I. Design information for the affected storage tanks showing the presence of permanent submerged loading pipe or the use of submerged loading fill when loading of volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) or loading of gasoline.
 - II. Maintenance and repair records for the affected storage tanks, as related to the repair or replacement of the loading pipe.
 - III. Identification and throughput of each material stored in the affected storage tanks, gal/yr.

3. Non-Applicability Determinations

- a. The storage 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 capacities of UG1 and two small methanol tanks are less than 75 cubic meters (19,813 gallons), M1 was constructed prior to July 23, 1984, and Methanol stored in M2 has a maximum true vapor pressure, 13.02 kilopascals, less than 15.0 kilopascals, pursuant to 40 CFR 60.110b(a) and (b).
- b. The storage tanks are not subject to 35 IAC 215.121, because the capacity of each of these tanks is less than 151 cubic meters (40,000 gallons).
- c. The affected storage tanks are not subject to 35 IAC 215.122(a), because the through-put loading of each of these tanks is less than 151 cubic meters (40,000 gallons) per day.
- d. The storage tanks are not subject to 35 IAC 215.583(a)(2), because these tanks are not located in any of the following counties: Boone, Cook, DuPage, Kane, Lake, Madison, McHenry, Peoria, Rock Island, St. Clair, Tazewell, Will or Winnebago, pursuant to 35 IAC 215.583(b).
- e. The storage tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these tanks do not use an add-on control device to achieve compliance with an emission limitation or standard.

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4. Other Requirements

For the emission units in Condition 4.7.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. Operational Flexibility Requirements

- i. Pursuant to Sections 39.5(7)(a) of the Act, the Permittee is authorized to make the following physical or operational change with respect to the affected storage tanks without prior notification to the IEPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:
 - A. Changes to components related to either the submerged loading pipe or submerged fill, including addition of new components and repair and replacement of components.
 - B. Changes in the material stored in the affect storage tanks, provided the affected storage tanks continue to comply with the Conditions 4.7.2(a)(i) and 4.7.2(b)(i).

5. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.7.2(a)(i) and 4.7.2(b)(i).
 - B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the information required in Condition 3.5(a)(iii).

Section 5 - Additional Title I Requirements

1. Construction Permits

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

2. Construction Permits - (Equipment Not Yet Built)

The Permittee shall comply with all applicable requirements of Condition 7.9 for all appropriate emission unit(s) identified in Condition 7.9 pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act. The Permittee shall certify compliance with the applicable requirements of Condition 7.9 as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new requirements in accordance to Condition 2.9 when the equipment is constructed.

Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

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

2. Insignificant Activities in 35 IAC 201.210(a)

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

| Insignificant Activity | Number of Units | Insignificant Activity Category |
|--|-----------------|----------------------------------|
| Facility Roads | N/A | 35 IAC 201.210(a)(1) and 201.211 |
| Blas Booth | 1 | 35 IAC 201.210(a)(2) or (a)(3) |
| Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4). | 13 | 35 IAC 201.210(a)(4) |
| Storage tanks < 10,000 gallon with annual throughput < 100,000 gallon (not storing gasoline or any material listed as a HAP). | 9 | 35 IAC 201.210(a)(10) |
| Storage tanks of virgin or refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oil. | 7 | 35 IAC 201.210(a)(11) |

3. Insignificant Activities in 35 IAC 201.210(b)

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

4. Applicable Requirements

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

- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 or 212.322 (see Conditions 7.2(a) and (b)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 8 lb/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

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nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.

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

5. Compliance Method

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

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

6. Notification Requirements for Insignificant Activities

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

a. Notification 7 Days in Advance

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

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

b. Notification Required at Renewal

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

c. Notification Not Required

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

Section 7 - Other Requirements

1. Testing

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

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

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

2. PM Process Weight Rate Requirements

a. New Process Emission Units - 35 IAC 212.321

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 PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM 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 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation: [35 IAC 212.321(b)]

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

Where:

P = Process weight rate (tons/hr)
E = Allowable emission rate (lb/hr)

A. Process weight rates of less than 450 tons/hr:

A = 2.54
B = 0.53

B. Process weight rates greater than or equal to 450 tons/hr:

A = 24.8
B = 0.16

iii. Limits for New Process Emission Units [35 IAC 212.321(c)]:

| <u>P</u> <u>(Tons/hr)</u> | <u>E</u> <u>(Lb/hr)</u> | <u>P</u> <u>(Tons/hr)</u> | <u>E</u> <u>(Lb/hr)</u> |
|------------------------------|----------------------------|------------------------------|----------------------------|
| 0.05 | 0.55 | 25.00 | 14.00 |
| 0.10 | 0.77 | 30.00 | 15.60 |
| 0.20 | 1.10 | 35.00 | 17.00 |
| 0.30 | 1.35 | 40.00 | 18.20 |
| 0.40 | 1.58 | 45.00 | 19.20 |
| 0.50 | 1.75 | 50.00 | 20.50 |
| 0.75 | 2.40 | 100.00 | 29.50 |
| 1.00 | 2.60 | 150.00 | 37.00 |
| 2.00 | 3.70 | 200.00 | 43.00 |
| 3.00 | 4.60 | 250.00 | 48.50 |
| 4.00 | 5.35 | 300.00 | 53.00 |
| 5.00 | 6.00 | 350.00 | 58.00 |
| 10.00 | 8.70 | 400.00 | 62.00 |
| 15.00 | 10.80 | 450.00 | 66.00 |
| 20.00 | 12.50 | 500.00 | 67.00 |

b. Existing Process Emission Units - 35 IAC 212.322

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

i. No person shall cause or allow the emission of PM 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 PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c)). See Condition 7.2(b)(iii) below. [35 IAC 212.322(a)]

ii. Interpolated and extrapolated values of the data in 35 IAC 212.322(c) shall be determined by using the equation: [35 IAC 212.322(b)]

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

Where:

P = Process weight rate (tons/hr)
E = Allowable emission rate (lb/hr)

A. Process weight rates of less than 450 tons/hr:

A = 4.10
B = 0.67
C = 0

B. Process weight rates greater than or equal to 450 tons/hr:

A = 55.0
B = 0.11
C = -40.0

iii. Limits for Existing Process Emission Units: [35 IAC 212.322(c)]

| <u>P</u> <u>(Tons/hr)</u> | <u>E</u> <u>(Lb/hr)</u> | <u>P</u> <u>(Tons/hr)</u> | <u>E</u> <u>(Lb/hr)</u> |
|------------------------------|----------------------------|------------------------------|----------------------------|
| 0.05 | 0.55 | 25.00 | 35.40 |
| 0.10 | 0.87 | 30.00 | 40.00 |
| 0.2 | 1.40 | 35.00 | 41.30 |
| 0.30 | 1.83 | 40.00 | 42.50 |
| 0.40 | 2.22 | 45.00 | 43.60 |
| 0.50 | 2.58 | 50.00 | 44.60 |
| 0.75 | 3.38 | 100.00 | 51.20 |
| 1.00 | 4.10 | 150.00 | 55.40 |
| 2.00 | 6.52 | 200.00 | 58.60 |
| 3.00 | 8.56 | 250.00 | 61.00 |
| 4.00 | 10.40 | 300.00 | 63.10 |
| 5.00 | 12.00 | 350.00 | 64.90 |
| 10.00 | 19.20 | 400.00 | 66.20 |
| 15.00 | 25.20 | 450.00 | 67.70 |
| 20.00 | 30.50 | 500.00 | 69.00 |

3. 40 CFR 60 Subpart A Requirements (NSPS)

a. 40 CFR 60 Subparts A and GG - NSPS for Stationary Gas Turbines

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

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

b. 40 CFR 60 Subparts A and KKKK - NSPS for Stationary Gas Turbines

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

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

4. 40 CFR 63 Subpart A Requirements (NESHAP)

a. 40 CFR 63 Subparts A and ZZZZ - NESHAP for Internal Combustion Engines

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

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

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

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

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

| General Provision Citation | General Provision Applicable? | Subject of Citation | Explanation (if required) |
|----------------------------|--|---|---|
| 40 CFR 63.8(g) | Yes | Data reduction | Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at 40 CFR 40 CFR 63.6635 and 63.6640 |
| 40 CFR 63.9(a) | Yes. | Applicability and State delegation of notification requirements | |
| 40 CFR 63.9(b)(1)-(5) | Yes | Initial notifications | Except that 40 CFR 63.9(b)(3) is reserved. |
| | Except that 40 CFR 63.9(b) only applies as specified in 40 CFR 63.6645 | | |
| 40 CFR 63.9(c) | Yes | Request for compliance extension | Except that 40 CFR 63.9(c) only applies as specified in 40 CFR 63.6645 |
| 40 CFR 63.9(d) | Yes | Notification of special compliance requirements for new sources | Except that 40 CFR 63.9(d) only applies as specified in 40 CFR 63.6645 |
| 40 CFR 63.9(e) | Yes | Notification of performance test | Except that 40 CFR 63.9(e) only applies as specified in 40 CFR 63.6645 |
| 40 CFR 63.9(f) | No | Notification of visible emission (VE)/opacity test | Subpart ZZZZ does not contain opacity or VE standards |
| 40 CFR 63.9(g)(1) | Yes | Notification of performance evaluation | Except that 40 CFR 63.9(g) only applies as specified in 40 CFR 63.6645 |
| 40 CFR 63.9(g)(2) | No | Notification of use of COMS data | Subpart ZZZZ does not contain opacity or VE standards |
| 40 CFR 63.9(g)(3) | Yes | Notification that criterion for alternative to RATA is exceeded | If alternative is in use |
| | Except that 40 CFR 63.9(g) only applies as specified in 40 CFR 63.6645 | | |
| 40 CFR 63.9(h)(1)-(6) | Yes | Notification of compliance status | Except that notifications for sources using a CEMS are due 30 days after completion of performance evaluations. 40 CFR 63.9(h)(4) is reserved |
| | | | Except that 40 CFR 63.9(h) only applies as specified in 40 CFR 63.6645 |
| 40 CFR 63.9(i) | Yes | Adjustment of submittal deadlines | |
| 40 CFR 63.9(j) | Yes | Change in previous information | |
| 40 CFR 63.10(a) | Yes | Administrative provisions for recordkeeping/reporting | |
| 40 CFR 63.10(b)(1) | Yes | Record retention | Except that the most recent 2 years of data do not have to be retained on site |
| 40 CFR 63.10(b)(2)(i)-(v) | No | Records related to SSM | |

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

| General Provision Citation | General Provision Applicable? | Subject of Citation | Explanation (if required) |
|-------------------------------|-------------------------------|---|---|
| 40 CFR 63.10(b)(2)(vi)-(xi) | Yes | Records | |
| 40 CFR 63.10(b)(2)(xii) | Yes | Record when under waiver | |
| 40 CFR 63.10(b)(2)(xiii) | Yes | Records when using alternative to RATA | For CO standard if using RATA alternative |
| 40 CFR 63.10(b)(2)(xiv) | Yes | Records of supporting documentation | |
| 40 CFR 63.10(b)(3) | Yes | Records of applicability determination | |
| 40 CFR 63.10(c) | Yes | Additional records for sources using CEMS | Except that 40 CFR 63.10(c)(2)-(4) and (9) are reserved |
| 40 CFR 63.10(d)(1) | Yes | General reporting requirements | |
| 40 CFR 63.10(d)(2) | Yes | Report of performance test results | |
| 40 CFR 63.10(d)(3) | No | Reporting opacity or VE observations | Subpart ZZZZ does not contain opacity or VE standards |
| 40 CFR 63.10(d)(4) | Yes | Progress reports | |
| 40 CFR 63.10(d)(5) | No | Startup, shutdown, and malfunction reports | |
| 40 CFR 63.10(e)(1) and (2)(i) | Yes | Additional CMS Reports | |
| 40 CFR 63.10(e)(2)(ii) | No | COMS-related report | Subpart ZZZZ does not require COMS |
| 40 CFR 63.10(e)(3) | Yes | Excess emission and parameter exceedances reports | Except that 40 CFR 63.10(e)(3)(i)(C) is reserved |
| 40 CFR 63.10(e)(4) | No | Reporting COMS data | Subpart ZZZZ does not require COMS |
| 40 CFR 63.10(f) | Yes | Waiver for recordkeeping/reporting | |
| 40 CFR 63.11 | No | Flares | |
| 40 CFR 63.12 | Yes | State authority and delegations | |
| 40 CFR 63.13 | Yes | Addresses | |
| 40 CFR 63.14 | Yes | Incorporation by reference | |
| 40 CFR 63.15 | Yes | Availability of information | |

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5. Startup Requirements

a. Startup Provisions

Pursuant to 35 IAC 201.149, 201.261, and 201.262, the source is authorized to operate in violation of the applicable requirements (as referenced in Section 4.3.4(a) of this CAAPP permit) during startup. The source has applied for such authorization in its application, generally describing the efforts that will be used "...to minimize startup emissions, duration of individual starts, and frequency of startups." As provided by 35 IAC 201.265, authorization in this CAAPP permit for excess emissions during startup does not shield the source from enforcement for any violation of applicable emission standard(s) that occurs during startup and only constitutes a prima facie defense to such an enforcement action provided that the source has fully complied with all terms and conditions connected with such authorization.

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

b. Monitoring - Recordkeeping

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

- i. A copy of the most recent startup procedures that contains at a minimum:
 - A. Estimate of excess opacity at startup.
 - B. Estimates of excess emissions for pollutants at startup.
 - C. Reasonable steps that will be used to minimize opacity or startup emissions, duration of individual starts, and frequency of startups.
- ii. Records for each individual startup that contains at a minimum:
 - A. Date, time, duration, and description of the startup.
 - B. Whether the most recent startup procedures were performed. If not performed, an explanation why the procedures were not performed.
 - C. Whether normal operation was achieved in the allowed duration (as referenced in Section 4.3.4(a) of this CAAPP permit). If not achieved, an explanation why normal operation was not achieved in the allowed duration.
 - D. An explanation of whether opacity or startup emissions during the startup exceeded the estimates in the startup procedures and whether opacity or startup emissions exceeded any applicable standard or limit not authorized to be violated during startup.

c. Monitoring - Reporting

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

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i. Prompt Reporting

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

ii. Semiannual Reporting

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

6. Malfunction Breakdown Requirements

a. Malfunction Breakdown Provisions

Pursuant to 35 IAC 201.149, 201.161, and 201.262, the source is authorized to continue operation in violation of the applicable requirements (as referenced in Section 4.5.4(b) of the CAAPP permit) during malfunction or breakdown. The source has applied for such authorization in its application, generally describing "such continued operation is necessary to prevent injury to persons or severe damage to equipment; or that such continued operation is required to provide essential services; provided, however, that continued operation solely for the economic benefit of the source shall not be sufficient for granting of permission." As provided by 35 IAC 201.265, authorization in this CAAPP permit for continued operation during malfunction or breakdown does not shield the source from enforcement for any violation of applicable emission standard(s) that occurs during malfunction or breakdown and only constitutes a prima facie defense to such an enforcement action provided that the source has fully complied with all terms and conditions connected with such authorization.

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

b. Monitoring - Recordkeeping

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

- i. A malfunction breakdown plan that includes the following at a minimum:
 - A. Estimate of typical opacity during malfunction or breakdown.
 - B. Estimates of typical emissions during malfunction or breakdown.
 - C. Reasonable steps that will be taken to minimize opacity and 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 opacity and 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 opacity and emissions during malfunction or breakdown were above typical emissions in the malfunction or breakdown procedures and whether opacity and emissions exceeded any applicable requirements.

c. Monitoring - Reporting

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

i. Prompt Reporting

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

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

ii. Semiannual Reporting

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

- A. A listing of all malfunctions and breakdowns, in chronological order, that includes: the date, time, and duration of each incident; and identity of the affected operation(s) involved in the incident.
- B. Dates of the notices and reports required by Prompt Reporting requirements of 7.6(c)(i) above.
- C. The aggregate duration of all incidents during the reporting period.
- D. If there have been no such incidents during the reporting period, this shall be stated in the report.

7. Compliance Assurance Monitoring (CAM) Requirements

a. CAM Provisions

i. Proper Maintenance

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

ii. Continued Operation

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

iii. Response to Excursions or Exceedances

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

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

b. Monitoring - Monitoring

Pursuant to 40 CFR 64.7(a), the source shall comply with the monitoring requirements of the CAM Plans as described in 7.7(e) below, pursuant to 40 CFR Part 64 as submitted in the source's CAM plan application.

c. Monitoring - Recordkeeping

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

d. Monitoring - Reporting

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

i. Semiannual Reporting

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

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

e. CAM Plans

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

| Table | Emission Unit Section | PSEU Designation | Pollutant |
|-------|-----------------------|-----------------------|-----------|
| 7.7.1 | 4.5 | TEG Dehydration Units | VOM |

Table 7.7.1 - CAM Plan

| | |
|------------------------|---|
| Emission Unit Section: | 4.5 |
| PSEU Designation: | TEG dehydration units, flare controlled |
| Pollutant: | VOM |

| Indicators: | #1) Flare operation | #2) |
|---|---|-----|
| General Criteria | | |
| The Monitoring Approach Used to Measure the Indicators: | Continuous monitoring of the pilot flame using a computerized data acquisition, feedback, and control system to demonstrate the flare operates at all times the dehydration unit is in operation. This is known as a pilot flame detection device. The pilot flame detection device includes an automated restart of the flare pilot to minimize time the flare flame is down. During periods of low temperature the alarm control system occasionally gives false alarms; therefore, following any alarm signaling a flare pilot absence, an operator will visually inspect the flare pilot light. After the operator has confirmed the presence or absence of the flare flame, the operator will record the results of the visual inspection and clear the system alarm or take action as needed to shut down the unit, relight the flame or continue operation pursuant to 35 IAC 201.262. | |
| The Indicator Range Which Provides a Reasonable Assurance of Compliance: | Indicator provides data regarding presence or absence of flame. | |
| Quality Improvement Plan (QIP) Threshold Levels: | Not applicable at this time. | |
| Performance Criteria | | |
| The Specifications for Obtaining Representative Data: | The pilot flame detection device was installed as specified by the manufacturer, and installation was performed by a qualified professional. | |
| Verification Procedures to Confirm the Operational Status of the Monitoring: | Manufacturer's recommendations regarding periodic testing/checks for the proper installation and operations of the pilot flame detection device will be followed. | |
| Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data: | Calibration, maintenance, and operation of the pilot flame detection device will be conducted in accordance with manufacturer specifications. | |
| The Monitoring Frequency: | Continuous when the unit is operating. | |
| The Data Collection Procedures That Will Be Used: | Alarmed signal of pilot flame outage is sent to the control panel and recorded. Records of alarms and the results of the operator's visual inspection will be recorded after every alarm. | |
| The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred: | There is no averaging period since the flare pilot flame is either present or absent. | |

8. Construction Permits

The Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. Construction Permit #13070016 (Equipment Not Yet Constructed) [T1]

Permit is hereby granted to Nicor Gas - Troy Grove - Station No. 50 to construct emission source(s) and/or air pollution control equipment consisting of a thermal oxidizer for the process vent from Dehydrator Unit VV6, as described in the application No. 13070016 submitted on July 12, 2013. This Permit is subject to Standard Conditions for Construction/Development Permits issued by the IEPA (APC-166) and the following special conditions:

- i. A. This permit authorizes installation of a thermal oxidizer (the affected oxidizer) for control of process emissions from the vent on the Reboiler #9 in Dehydration Unit VV6 (the affected unit). The affected oxidizer would replace the flare that currently controls process emissions from this unit.
- B. This permit does not authorize any increase in the capacity of the affected unit.
- ii. This permit does not change applicable emission standards or recordkeeping or reporting requirements for the affected unit, as addressed in the current CAAPP permit for the source, Permit 95120023.
- iii. The Permittee shall maintain and operate the affected unit and associated control equipment, in a manner consistent with good air pollution control practice for minimizing emissions at all times, including periods of startup, shutdown, and malfunction.
- iv. This permit is issued based on this project, i.e., installation of a thermal oxidizer on the affected unit, not being a major modification for purposes of federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. This is because the affected oxidizer will provide equal or better control of emissions of volatile organic material (VOM). The emissions of other regulated NSR pollutants from the affected oxidizer will not be significant.
- v. A. Natural gas shall be the only fuel fired in the affected oxidizer.
- B. The rated capacity of the fuel burners in the affected oxidizer shall not exceed 2 mmBtu/hr, total.
- C. At all times, the Permittee shall, to the extent practicable, maintain and operate the affected unit with the affected oxidizer, in a manner consistent with good air pollution control practice for minimizing emissions.
- vi. Within 90 days of a written request from the IEPA, or the date agreed upon by the IEPA, whichever is later, the Permittee shall have conducted performance testing of the affected oxidizer for VOM control efficiency by a qualified independent testing service during representative operating conditions.
- vii. The Permittee shall install, operate and maintain instrumentation of the affected oxidizer for the temperature in the combustion chamber. If data from this instrument is not automatically recorded on at least an hourly average basis, the Permittee shall record the measured temperature at least once per operating day.
- viii. A. The Permittee shall maintain a copy of the performance specification for the affected oxidizer (VOM destruction efficiency) and recommendations for operation and maintenance of the affected oxidizer provided by the manufacturer.

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- B. The Permittee shall maintain a file for the capacity of the burner(s) on the affected oxidizer, with supporting documentation, if this data is not provided on the name plate for the oxidizer or the burner(s).
- C. The Permittee shall maintain following records for the affected unit and the affected oxidizer:
 - I. Inspection and maintenance records for the oxidizer, including the date of inspection and maintenance performed, with description of activity(-ies) performed.
 - II. Identification of any period when the affected unit is not operated with the affected oxidizer, with explanation.
- D. All records and logs 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 IEPA 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 IEPA or USEPA request for records during the course of a source inspection.
- ix. A. The Permittee shall notify the IEPA when the existing flare on the affected unit is permanently removed from service.
 - B. If there is any deviation from the requirements of this permit, the Permittee shall submit a report to the IEPA, within 30 days after the deviation or such other time period specified in the source's CAAPP permit. The report shall include a description of the deviation, the probable cause of the deviation, the corrective actions taken and any actions taken to prevent future occurrences.
- x. Two copies of all reports, notifications, and correspondence required by this permit shall be sent to:

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

Tel: 217/782-5811 Fax: 217/782-6348

and one copy shall be sent to IEPA's regional office at the following address:

Illinois Environmental Protection Agency
Division of Air Pollution Control
5407 N. University St.
Peoria, Illinois 61614

Tel: 309-693-5461 Fax: 309-693-5467

- xi. The Permittee may operate the affected unit with the affected oxidizer pursuant to this construction permit until a renewed or revised CAAPP permit is issued for the source that addresses this oxidizer. This condition supersedes Standard Condition 6 in Standard Conditions for Construction/Development Permits issued by the IEPA (APC-166).

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b. Construction Permit #11110038 (Equipment Not Yet Constructed) [T1]

Permit is hereby granted to Nicor Gas - Troy Grove - Station No. 50 to construct oxidation catalytic converter systems on two existing engines (SG1 and SG4), as described in the application No. 11110038 submitted on November 17, 2011. This Permit is subject to Standard Conditions for Construction/Development Permits issued by the IEPA (APC-166) and the following special conditions:

i. Introduction

- A. This permit authorizes installation of oxidation catalytic converter systems (the affected systems) on two existing Caterpillar engines (the affected engines) to reduce emissions of CO and HAPs from the affected engines. The affected systems would be installed to comply with the applicable requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63 Subpart ZZZZ (the Engine NESHAP), and the general provisions established in 40 CFR 63 Subpart A.
- B. This permit does not authorize any increase to the capacity or the potential emissions from the affected engines.

ii. Applicable Requirements

- A. This permit does not relax or revise any requirements and conditions that currently apply to the affected engines, including applicable emission standards and limits and applicable monitoring, testing, recordkeeping, and reporting requirements in the current Clean Air Act Permit Program (CAAPP) permit for the source, Permit No. 95120023.
- B. 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 engines, the Permittee shall:
 - 1. Reduce CO emissions by at least 93 percent, as specified in Table 2d, Item 8(b) of the Engine NESHAP; or
 - 2. 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.

iii. Non-applicability Provisions

- A. This permit is issued based on this project, i.e., the installation of the affected systems on the affected engines being an emissions control project, whose primary purpose is to reduce HAP emissions and comply with the Engine NESHAP.
- B. This permit is issued based on the affected engines not being subject to requirements of the Engine NESHAP for major source of HAPs because the source is an "area source", as defined by 40 CFR 63.6585(c). This is because potential emissions of any single HAP from the source is less than 10 tons/yr and total combined HAP emissions is less than 25 tons/yr. (Refer to Construction Permit 01100063, which limits the HAP emissions from the source to below major source thresholds.)

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C. The IEPA has determined that this project, as described in the application, will not constitute a modification of the affected engines under the federal New Source Performance Standards, 40 CFR 60, because the affected systems have the primary function of reducing emissions and therefore, are not considered a modification pursuant to 40 CFR 60.14(e)(5).

iv. Operating Limits and Requirements.

A. Pursuant to the Engine NESHAP:

I. Pursuant to 40 CFR 63.6603(a) and Table 2b of the Engine NESHAP, the Permittee shall operate each affected engine and affected system as follows:

1. The pressure drop across the system shall not vary by more than 2 inches of water at 100% load and shall be maintained within 10% from the pressure drop across the system measured during the initial performance test; and
2. Operate the engine such that the inlet temperature to the oxidation system is maintained between 450 and 1350°F.

II. For each affected engine, the Permittee shall comply with the applicable requirement of 40 CFR 63.6625(h) related to startup of engines, including minimizing duration of startups and the time spent at idle.

III. As the affected engines are subject to the Engine NESHAP:

1. 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.
2. 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).

IV. Pursuant to 40 CFR 63.6605(b) and 40 CFR 63.6(e)(1), prior to the effective compliance date for the affected engines under the Engine NESHAP, the Permittee may operate the affected engines without the affected catalyst systems, as may be necessary to facilitate shakedown and commissioning. During such period, the Permittee shall still operate the affected engines in accordance with good air pollution control practice.

v. Testing Requirements

A. I. For each affected 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. Notwithstanding 5(a)(i), 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:

1. The test must have been conducted using the same methods specified in the Engine NESHAP and these methods must have been followed correctly.
 2. The test must not be older than 2 years.
 3. The test must be reviewed and accepted by the IEPA or USEPA.
 4. 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.
- B. 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.

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

vi. Operational Monitoring Requirements

- A. 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.
- B. Pursuant to the Engine NESHAP, Table 6, Item 10, the Permittee shall measure and record the pressure drop across each affected system at least once per month.

vii. Recordkeeping Requirements

- A. The Permittee shall maintain all applicable records required by the Engine NESHAP for each affected engine and system, including the records required by 40 CFR 63.8(e) and 40 CFR 63.6655.
- B. The Permittee shall maintain the following records for each affected engine and system:
 - I. A file containing:
 1. The manufacturer and model of each affected system.

2. Data for the maximum hourly emission rates for individual HAP and total HAPs from the engine (lb/hour), with supporting documentation and calculations.
 3. A copy of the operation and maintenance procedures for the affected system recommended by the manufacturer.
- II. A log or other records for inspection, maintenance and repair activities, with dates and description of such activities.
 - III. If an affected engine is designated a "limited use" engine by the Permittee, records for the actual operating hours of the engine in each calendar year.
- C. The Permittee shall maintain records for the actual HAP emissions of the affected engines and the source (tons/mo and tons/yr), with supporting data and calculations.

viii. Retention of Records

- A. Unless a longer retention period is specified by the NESHAP for particular records, records and logs required by this permit shall be retained at a readily accessible location at either the source or the Permittee's main office in Illinois for at least five years from the date of entry and shall be made available for inspection and copying by the IEPA 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 IEPA request for records during the course of a source inspection.

ix. Notification and 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. If there is a deviation of the requirements of this permit, not otherwise addressed pursuant to the reporting requirements of the Engine NESHAP, the Permittee shall submit a report to the IEPA within 30 days after deviation. The report shall include a description of the deviation, the probable cause of the deviation, the corrective actions taken and any actions taken to prevent future occurrences.

x. Addresses for Notification and Reporting

- A. Two copies of all reports, notifications, and correspondence required by this permit shall be sent to:

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

Tel: 217-782-5811 Fax: 217-782-6348

and one copy shall be sent to:

Nicor Gas - Station No. 50
I.D. No.: 099832AAF
Permit No.: 95120023

Date Received: 09-18-2006
Date Issued: 12-15-2014

Illinois Environmental Protection Agency
Division of Air Pollution Control
5407 North University Street
Peoria, Illinois 61614

Tel: 309-693-5476

xi. Authorization for Operation

- A. The Permittee may operate the affected engines with the affected systems pursuant to this construction permit until the CAAPP permit for the source is renewed or revised to address these systems. This condition supersedes Standard Condition 6 in Standard Conditions for Construction/Development Permits issued by the IEPA (APC-166).

Section 8 - State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

| <i>Pollutant</i> | | <i>Tons/Year</i> |
|--------------------------------|--------------------|------------------|
| Volatile Organic Material | (VOM) | 37.73 |
| Sulfur Dioxide | (SO ₂) | 1.83 |
| Particulate Matter | (PM) | 7.99 |
| Nitrogen Oxides | (NO _x) | 317.39 |
| HAP, not included in VOM or PM | (HAP) | 18.28 |
| Total | | 383.22 |

Attachment 1 - List of Emission Units at This Source

| Section | Emission Units | Description |
|---------|---|---|
| 4.1 | OC5 | 9,800 HP output/96.7 mmBtu/hr heat input rate of Natural Gas-Fired Turbine for Orenda Compressor #5 |
| | OC6 | 9,800 HP output/96.7 mmBtu/hr heat input rate of Natural Gas-Fired Turbine for Orenda Compressor #6 |
| | OC7 | 9,800 HP output/96.7 mmBtu/hr heat input rate of Natural Gas-Fired Turbine for Orenda Compressor #7 |
| | SC21 | 1,300 HP output/10.2 mmBtu/hr heat input rate of Natural Gas-Fired Turbine for Solar Compressor #21 |
| | SC22 | 1,300 HP output/10.2 mmBtu/hr heat input rate of Natural Gas-Fired Turbine for Solar Compressor #21 |
| | SC23 | 1,300 HP output/10.2 mmBtu/hr heat input rate of Natural Gas-Fired Turbine for Solar Compressor #21 |
| | SC24 | 1,275 HP output/10.2 mmBtu/hr heat input rate of Natural Gas-Fired Turbine for Solar Compressor #24 |
| | SC25 | 1,300 HP output/10.2 mmBtu/hr heat input rate of Natural Gas-Fired Turbine for Solar Compressor #21 |
| | SC26 | 1,275 HP output/10.2 mmBtu/hr heat input rate of Natural Gas-Fired Turbine for Solar Compressor #26 |
| 4.2 | DR31 | 5,700 HP output/51.0 mmBtu/hr heat input rate of Natural Gas-Fired Dresser Rand Turbine |
| | Mars41 | 15,000 HP output/112.0 mmBtu/hr heat input rate of Natural Gas-Fired Solar Mars Turbine #1 |
| 4.3 | Mars51 | 15,000 HP output/112.0 mmBtu/hr heat input rate of Natural Gas-Fired Solar Mars Turbine #2 |
| | SC27 | 10,011 HP output/91.3 mmBtu/hr heat input rate of Natural Gas Fired Turbine for Solar Compressor #27 |
| | SC28 | 10,011 HP output/91.3 mmBtu/hr heat input rate of Natural Gas Fired Turbine for Solar Compressor #28 |
| 4.4 | CC3 | 1,000 HP output/8.0 mmBtu/hr heat input rate of Natural Gas-Fired SI 2SLB Engine for Cooper Compressor #3 |
| | CC4 | 1,000 HP output/8.0 mmBtu/hr heat input rate of Natural Gas-Fired SI 2SLB Engine for Cooper Compressor #4 |
| | SG2 | 500 HP output/4.0 mmBtu/hr heat input rate of Natural Gas-Fired SI 4SRB Engine for Station Generator #2 |
| | SG3 | 310 HP output/2.5 mmBtu/hr heat input rate of Natural Gas-Fired SI 4SRB Engine for Station Generator #3 |
| | SG4 | 814 HP output/6.1 mmBtu/hr heat input rate of Natural Gas-Fired SI 4SLB Engine for Station Generator #4 |
| | CG5 | 225 HP output/1.8 mmBtu/hr heat input rate of Natural Gas-Fired SI 4SRB Engine for Station Generator #5 |
| | CG6 | 225 HP output/1.8 mmBtu/hr heat input rate of Natural Gas-Fired SI 4SRB Engine for Station Generator #6 |
| | CG7 | 225 HP output/1.8 mmBtu/hr heat input rate of Natural Gas-Fired SI 4SRB Engine for Station Generator #7 |
| | SG1 | 637 HP output/5.9 mmBtu/hr heat input rate of Natural Gas-Fired SI 4SLB Engine for Station Generator #1 |
| 4.5 | VV1 | National TEG Dehydration Unit Vapor Vent #1 at the main station |
| | VV2 | Parkersburg TEG Dehydration Unit Vapor Vent #2 at the main station |
| | VV3 | BS & B TEG Dehydration Unit Vapor Vent #3 at the main station |
| | VV4 | Delta TEG Dehydration Unit Vapor Vent #4 at the main station |
| | VV5 | Tulpro TEG Dehydration Unit Vapor Vent #5 at the main station |
| | VV6 | National TEG Dehydration Unit Vapor Vent #1 at the main station |
| | VV1N | TEG Dehydration Unit Vapor Vent #1 at the north station |
| | VV2N | TEG Dehydration Unit Vapor Vent #2 at the north station |
| | VV3N | TEG Dehydration Unit Vapor Vent #3 at the north station |
| VV4N | TEG Dehydration Unit Vapor Vent #4 at the north station | |

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| <i>Section</i> | <i>Emission Units</i> | <i>Description</i> |
|----------------|-----------------------|--|
| 4.6 | HB1 | 3.12 mmBtu/hr Natural Gas-Fired Boiler |
| | HB2 | 2.52 mmBtu/hr Natural Gas-Fired Boiler |
| | HB3 | 2.52 mmBtu/hr Natural Gas-Fired Boiler |
| 4.7 | M1 | 30,000 Gallon Methanol Storage Tank |
| | - | 300 Gallon Methanol Tank |
| | - | 300 Gallon Methanol Tank |
| 4.7 | UG1 | 2,000 Gallon Gasoline Storage Tank |
| | M2 | 20,000 Gallon Methanol Storage Tank |

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Attachment 2 - Acronyms and Abbreviations

| | |
|------------------|--|
| acfm | Actual cubic feet per minute |
| ACMA | Alternative Compliance Market Account |
| Act | Illinois Environmental Protection Act [415 ILCS 5/1 et seq.] |
| AP-42 | Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711 |
| ATU | Allotment trading unit |
| BACT | Best Available Control Technology |
| BAT | Best Available Technology |
| Btu | British Thermal Units |
| CAA | Clean Air Act [42 U.S.C. Section 7401 et seq.] |
| CAAPP | Clean Air Act Permit Program |
| CAIR | Clean Air Interstate Rule |
| CAM | Compliance Assurance Monitoring |
| CEMS | Continuous Emission Monitoring System |
| CFR | Code of Federal Regulations |
| CISWI | Commercial Industrial Solid Waste Incinerator |
| CO | Carbon monoxide |
| CO ₂ | Carbon dioxide |
| COMS | Continuous Opacity Monitoring System |
| CPMS | Continuous Parameter Monitoring System |
| dscf | Dry standard cubic foot |
| dscm | Dry standard cubic meter |
| ERMS | Emissions Reduction Market System |
| °F | Degrees Fahrenheit |
| GHG | Green house gas |
| GACT | Generally Acceptable Control Technology |
| gr | Grains |
| HAP | Hazardous air pollutant |
| Hg | Mercury |
| HMIWI | Hospital medical infectious waste incinerator |
| hp | Horsepower |
| hr | Hour |
| H ₂ S | Hydrogen sulfide |
| I.D. No. | Identification number of source, assigned by IEPA |
| IAC | Illinois Administrative Code |
| ILCS | Illinois Compiled Statutes |
| IEPA | Illinois Environmental Protection Agency |
| ISO | International Organization for Standardization |
| kw | Kilowatts |
| LAER | Lowest Achievable Emission Rate |

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| | |
|-------------------|--|
| lbs | Pound |
| m | Meter |
| MACT | Maximum Achievable Control Technology |
| M | Thousand |
| MM | Million |
| mo | Month |
| MSDS | Material Safety Data Sheet |
| MSSCAM | Major Stationary Sources Construction and Modification (Non-attainment New Source Review) |
| MW | Megawatts |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NO _x | Nitrogen oxides |
| NSPS | New Source Performance Standards |
| NSR | New Source Review |
| PB | Lead |
| PEMS | Predictive Emissions Monitoring System |
| 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 |
| PM _{2.5} | Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods |
| ppm | Parts per million |
| ppmv | Parts per million by volume |
| ppmw | Parts per million by weight |
| PSD | Prevention of Significant Deterioration |
| PSEU | Pollutant-Specific Emission Unit |
| psia | Pounds per square inch absolute |
| PTE | Potential to emit |
| RACT | Reasonable Available Control Technology |
| RMP | Risk Management Plan |
| scf | Standard cubic feet |
| SCR | Selective catalytic reduction |
| SIP | State Implementation Plan |
| SO ₂ | Sulfur dioxide |
| T1 | Title I - identifies Title I conditions that have been carried over from an existing permit |
| T1N | Title I New - identifies Title I conditions that are being established in this permit |
| T1R | Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit |
| USEPA | United States Environmental Protection Agency |
| VOM | Volatile organic material |

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Attachment 3 - Contact and Reporting Addresses

| | |
|---|---|
| <p style="text-align: center;">IEPA Compliance Section</p> <p style="text-align: center;">IEPA Stack Test Specialist</p> <p style="text-align: center;">IEPA Air Quality Planning Section</p> <p style="text-align: center;">IEPA Air Regional Field Operations Regional Office #2</p> <p style="text-align: center;">IEPA Permit Section</p> | <p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Regional Office #2 412 SW Washington Street, Suite D Peoria, Illinois 61602</p> <p>Phone No.: 309/672-3022</p> <p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506</p> <p>Phone No.: 217/785-1705</p> |
| <p style="text-align: center;">USEPA Region 5 - Air Branch</p> | <p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604</p> <p>Phone No.: 312/353-2000</p> |

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Attachment 4 - Example Certification by a Responsible Official

| SIGNATURE BLOCK | |
|---|--------------------|
| NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE. | |
| I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H)) | |
| AUTHORIZED SIGNATURE: | |
| BY: _____ | _____ |
| AUTHORIZED SIGNATURE | TITLE OF SIGNATORY |
| _____ | _____/_____/_____ |
| TYPED OR PRINTED NAME OF SIGNATORY | DATE |

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STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

STANDARD CONDITIONS
FOR
OPERATING PERMITS

May, 1993

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

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

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 with applicable local laws, ordinances and regulations.
2. 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 ground for revocation under 35 Ill. Adm. Code 201.166.
3.
 - a. The Permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Illinois EPA and unless a new permit or revision of the existing permit(s) is issued for such modification.
 - b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.
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 emission 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 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 facilities;
 - c. Does not take into consideration or attest to the structural stability of any unit or part of the project; and
 - d. 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.
6. The facilities covered by this permit shall be operated in such a manner that the disposal of air contaminants collected by the equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.
 7. The Permittee shall maintain all equipment covered under this permit in such a manner that the performance of such equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.
 8. The Permittee shall maintain a maintenance record on the premises for each item of air pollution control equipment. This records shall be made available to any agent of the Environmental Protection Agency at any time during normal working hours and/or operating hours. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.
 9. No person shall cause or allow continued operation during malfunction, breakdown or startup of any emission source or related air pollution control equipment if such operation would cause a violation of an applicable emission standard or permit limitation. Should a malfunction, breakdown or startup occur which results in emissions in excess of any applicable standard or permit limitation, the Permittee shall:
 - a. Immediately report the incident to the Illinois EPA's Regional Field Operations Section Office by telephone, telegraph, or other method as constitutes the fastest available alternative, and shall comply with all reasonable directives of the Illinois EPA with respect to the incident;
 - b. Maintain the following records for a period of no less than two (2) years:
 - i. Date and duration of malfunction, breakdown, or startup,
 - ii. Full and detailed explanation of the cause,
 - iii. Contaminants emitted and an estimate of quantity of emissions,
 - iv. Measures taken to minimize the amount of emissions during the malfunction, breakdown or startup, and
 - v. Measures taken to reduce future occurrences and frequency of incidents.
 10. If the permit application contains a compliance program and project completion schedule, the Permittee shall submit a project completion status report within thirty (30) days of any date specified in the compliance program and project completion schedule or at six month intervals, whichever is more frequent.
 11. The Permittee shall submit an Annual Emission Report as required by 35 Ill. Adm. Code 201.302 and 35 Ill. Adm. Code Part 254.