

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Chicago Carbon Company
Attn: Christopher N. Bartelt
12308 South New Avenue
Lemont, Illinois 60439

<u>Application No.:</u> 96010074	<u>I.D. No.:</u> 197803AAK
<u>Applicant's Designation:</u>	<u>Date Received:</u> January 23, 1996
<u>Operation of:</u> Petroleum Coke Products	
<u>Date Issued:</u> June 8, 2000	<u>Expiration Date</u> ² : June 8, 2005
<u>Source Location:</u> 12308 South New Avenue, Lemont, Will County	
<u>Responsible Official:</u> Christopher N. Bartelt	

This permit is hereby granted to the above-designated Permittee to OPERATE a petroleum coke product plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:JRC:jar

cc: Illinois EPA, FOS, Region 1
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Chicago Carbon Company (An Affiliate of Unocal)
12308 South New Avenue
Lemont, Illinois 60439
630/257-7751

I.D. No.: 197803AAK
Standard Industrial Classification: 2999, Other

1.2 Owner/Parent Company

Chicago Carbon Company/The Needle Coker Company
12308 South New Avenue
Lemont, Illinois 60439

1.3 Operator

Chicago Carbon Company
12308 South New Avenue
Lemont, Illinois 60439

Christopher N. Bartelt
630/257-7751 X 174

1.4 General Source Description

The Chicago Carbon Company is located at 12308 South New Avenue, Lemont. The source's function is to receive and calcine green (raw) petroleum coke. The plant has two rotary kilns that process two different types of petroleum coke. The calcining or heat treatment of green petroleum coke serves three main purposes: it removes impurities such as water and volatile matter from the coke, it densifies the coke and it converts the coke into an electrically conductive material.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

None

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

Wet Scrubber

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

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

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

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

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

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

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

3.2 Compliance with Applicable Requirements

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

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
1	K-1 Calcining Unit (7312)	April 1970	K-1 Cooler Multiclone (7025) K-1 Pyroscrubber (7009) K-1 Process Baghouse (7309) K-1 Dedust Application (7027)
2	K-2 Calcining Unit (8330)	April 1979	K-2 Cooler Multiclone (8025) K-2 Pyroscrubber (8009) K-2 Process Baghouse (8309) K-2 Dedust Application (8064)
3	1,950 Gallon Gasoline Storage Tank (7153)	May 1985	None
4	Bulk Conveyor System and Truck Loading Process	(K-1 Unit) April 1970 (K-2 Unit) April 1979	Product Handling Baghouses (7040), (7350), (8040), (8454), (8361)
	Barge Loading Process	(Green Coke) April 1970 (Calcined Coke) January 1979	Product Handling Baghouse (7210)
5	Storage Piles	-	-
	Traffic Areas	-	-

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of NO_x, PM, SO₂, VOM, and HAPs emissions.

5.2 Applicable Regulations

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

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

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b.
 - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
 - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
 - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust

suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

- c. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

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

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC

after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	39
Sulfur Dioxide (SO ₂)	3,829
Particulate Matter (PM)	190
Nitrogen Oxides (NO _x)	187
HAP, not included in VOM or PM	32
TOTAL	4,277

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section

502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for Operating Scenarios

N/A

5.6.3 Retention and Availability of Records

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

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

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the

associated emergency conditions report that has been approved by the Illinois EPA;

- v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 306 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 34.72 tons.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

Not applicable.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

a. Seasonal component of the Annual Emissions Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:

i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;

- ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
- iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

None

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 K-1 Calcining Unit (7312)

7.1.1 Description

The K-1 Calcining Unit (7312) processes (calcines) petroleum coke. The coke processed in the K-1 Calcining Unit is petroleum sponge coke. The calcining or heat treatment of green petroleum coke serves three main purposes: it removes impurities such as water and volatile matter from the coke, it densifies the coke and it converts the coke into an electrically conductive material.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
1	K-1 Calcining Unit (7312)	K-1 Cooler Multiclone (7025) K-1 Pyroscrubber (7009) K-1 Process Baghouse (7309) K-1 Dedust Application (7027)

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected calcining unit" for the purpose of these unit-specific conditions, is the process emission unit described in Conditions 7.1.1 and 7.1.2.
- b. The affected calcining unit is subject to the emission limits identified in Condition 5.2.2.
- c. The affected calcining unit is subject to 35 IAC 212.322(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 2) [35 IAC 212.322(a)].

- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].

- e. The affected calcining unit is subject to 35 IAC 218.986(a), which provides that every owner or operator of an emission unit subject to 35 IAC 218 Subpart TT shall employ emission capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit.

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected calcining unit is not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the affected calcining unit is not by definition a fuel combustion emission unit.
- b. The affected calcining unit is not subject to 35 IAC 217.141, emissions of nitrogen oxides from existing fuel combustion emission sources, because the affected calcining unit is not by definition a fuel combustion emission unit.

7.1.5 Operational and Production Limits and Work Practices

- a. The Permittee shall operate the affected calcining unit in accordance with Consent Order 97 CH 5503 and in particular, the following Conditions from Consent Order 97 CH 5503 except as provided in Condition 7.1.5(b):
 - i. The Permittee shall operate in accordance to all activities specifically recommended for implementation from both the engineering investigation and comprehensive review.
 - ii. The Permittee shall use a continuous recording differential pressure gauge to measure the pressure drop across the K-1 process baghouse.
 - iii. The Permittee shall calibrate and maintain the continuous recording differential pressure gauge required in Condition 7.1.5(b)(ii) in good working condition in accordance with the manufacturers' instructions.
 - iv. The Permittee shall at all times have on staff at least one certified opacity reader.
 - v. The Permittee shall observe and record the opacity of any visible emission from the affected calcining unit, during any upset,

breakdown or malfunction of said unit, provided that lighting and atmospheric conditions permit. Such observations and recordings of the opacity of visible emissions shall be made by a certified opacity reader.

- vi. The Permittee shall use an emergency by-pass stack near the inlet to the K-1 process baghouse. In the event the outlet plenum of the K-1 process baghouse goes into high temperature alarm state, the Permittee shall take appropriate corrective action which may include, but not be limited to, the procedure outlined in the Permittee's procedure number 00.2100.00 titled, "7309 Plenum High Temperature Alarm Procedure".
 - vii. The Permittee shall at all times properly operate and maintain the affected calcine unit so as to eliminate the emission of contaminants, including particulate matter, in excess of the regulatory or permitted limits which violate the Act and the Board's Air Pollution regulations.
- b. The Conditions of 7.1.5(a) shall terminate three (3) years after the date of its entry provide all of the following having occurred in accordance with Consent Order 97 CH 5503:
- i. Unocal has achieved compliance with the terms and conditions of Consent Order 97 CH 5503.
 - ii. Thirty (30) days prior to proposed termination, the Permittee has certified in the manner indicated in Section VII.E. of Consent Order 97 CH 5503 that it is in compliance with all requirements of Consent Order 97 CH 5503.
 - iii. The Permittee has paid all penalties due hereunder and no penalties or interest are outstanding or owed the Illinois EPA.
 - iv. The Plaintiff, within forty-five (45) days after receiving the certification pursuant to Section VII.K.b. of Consent Order 97 CH 5503, has not contested the certification. If the Illinois EPA disputes the Permittee's certification, the Consent Order 97 CH 5503 shall remain in effect pending resolution of

the dispute by the parties or Court in accordance with the Dispute Resolution provisions of Section VII.G of Consent Order 97 CH 5503.

7.1.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.1.7 Testing Requirements

Pursuant to 35 IAC 218.988(a), when in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with Condition 7.1.3(e) (see also 35 IAC 218.986), the owner or operator of a VOM emission unit subject to the requirements of 35 IAC 218 Subpart TT shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105.

7.1.8 Monitoring Requirement

Pursuant to 35 IAC 218.105(d)(2)(A)(i), an owner or operator that uses an afterburner to comply with any Section of 35 IAC Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected calcining unit to demonstrate compliance with Conditions 5.5.1, 7.1.3, 7.1.5, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records showing compliance with affected calcining unit in accordance with Consent Order 97 CH 5503.
- b. Records of any required tests as required in Condition 7.1.7.
- c. Records of each afterburner subject to 7.1.8 showing installation, calibration, maintenance, operation in

accordance to vendor specifications at all times when the afterburner is in use.

- d. The combustion chamber temperature of each afterburner subject to 7.1.8.
- e. Yearly fuel consumption of the affected calcining unit.
- f. Yearly throughput of the affected calcining unit.
- g. Percent (%) sulfur in feed.
- h. Yearly emissions of PM, SO₂, NO_x and HAPs from the affected calcining unit.
- i. The Permittee shall maintain records of excess emissions during malfunction and breakdown as allowed in Condition 7.1.11. As a minimum, these records shall include:
 - i. Date and duration of malfunction or breakdown.
 - ii. A full and detailed explanation of the cause for such emissions.
 - iii. The contaminants emitted and an estimate of the quantity of emissions.
 - iv. The measures used to reduce the quantity of emissions and the duration of the occurrence.
 - v. The steps taken to prevent similar malfunctions or breakdown or reduce their frequency and severity.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected calcining unit with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. The owner or operator of a subject VOM emission unit shall notify the Illinois EPA of any violation of the requirements of Condition 7.1.3(e) (see also 35 IAC 218 Subpart TT) by sending a copy of any record showing a violation to the Illinois EPA within 30 days

following the occurrence of the violation [35 IAC 218.991(a)(3)(A)].

- b. Emissions of PM or SO₂ in excess of the limits in Condition 7.1.3(c) or (d) within 30 days of such an occurrence.
- c. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours upon the occurrence of excess emissions due to malfunctions or breakdowns as allowed in Condition 7.1.11. The Permittee shall comply with all reasonable and safe directives of the regional office regarding such malfunctions and breakdowns. Within five (5) working days of such occurrence, the Permittee shall give a written follow-up notice to the Illinois EPA's regional office providing an explanation of the occurrence, the length of time during which operation continued under such conditions, measures taken by the Permittee to minimize excess emissions and correct deficiencies, and when normal operation resumed. [T1]

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

- a. Operation in excess of applicable emission standards for the affected calcining unit is allowed during malfunction or breakdown of the rotary kilns, pyroscrubbers, and waste heat recovery boilers, provided that the feed to the kiln is reduced at a rate to ensure minimum on stream time, and all measures, such as use of off-shift labor is taken to minimize the quantity of air contaminant emissions and length of time during which such operation is continued. [T1]

7.1.12 Compliance Procedures

- a. Compliance provisions addressing Conditions 7.1.3(c), (d), and (e) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of the affected calcining unit.
- b. Compliance with 7.1.8 is demonstrated by the recordkeeping requirements of 7.1.9(c) and (d).
- c. Compliance with the emission limits in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

- i. Emissions from the affected calcining unit for PM, NO_x, and HAPS (HCL):

	Emission Factor
<u>Emission</u>	<u>(lb/ai Ton Feed)</u>
PM	0.9998
NO _x	0.523
HAPS (HCL)	0.1544

These are emission factors determined for the affected calcining unit using stack test emission factors.

Appropriate Emissions (ton) = Throughput (ai ton) x The Appropriate Emission Factor (lb/ai ton feed) ÷ 2000 lb/ton

- ii. Emissions from the affected calcining unit for SO₂:

	Emission Factor
<u>Emission</u>	<u>(lb/ai Ton Feed)</u>
SO ₂	0.8465(S ²) + 5.4053(S) + 2.5305
	Where S = % Sulfur

The emission factor for SO₂ was developed by varying process feed rate and feed sulfur, and monitoring by a continuous SO₂ emission monitor.

SO₂ Emissions (ton) = Throughput (ai ton) * [0.8465(S²) + 5.4053(S) + 2.5305] (lb/ai ton feed) ÷ 2000 lb/ton

7.2 K-2 Calcining Unit (8330)

7.2.1 Description

The K-2 Calcining Unit (8330) processes (calcines) one type of petroleum coke. The coke processed in the K-2 Calcining Unit is petroleum needle coke. The calcining or heat treatment of green petroleum coke serves three main purposes: it removes impurities such as water and volatile matter from the coke, it densifies the coke and it converts the coke into an electrically conductive material.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
2	K-2 Calcining Unit (8330)	K-2 Cooler Multiclone (8025) K-2 Pyroscrubber (8009) K-2 Process Baghouse (8309) K-2 Dedust Application (8064)

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected calcining unit" for the purpose of these unit-specific conditions, is the process emission unit described in Conditions 7.2.1 and 7.2.2.
- b. The affected calcining unit is subject to the emission limits identified in Condition 5.2.2.
- c. The affected calcining unit is subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].

- e. The affected calcining unit is subject to 35 IAC 218.986(a), which provides that every owner or operator of an emission unit subject to 35 IAC 218 Subpart TT shall employ emission capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit.

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected calcining unit is not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the affected calcining unit is not by definition a fuel combustion emission unit.
- b. The affected calcining unit is not subject to 35 IAC 217.141, emissions of nitrogen oxides from existing fuel combustion emission sources, because the affected calcining unit is not by definition a fuel combustion emission unit.

7.2.5 Operational and Production Limits and Work Practices

- a. The affected calcining unit may only process needle coke.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected calcining unit is subject to the following:

- a. Emissions of SO₂ while processing needle coke shall not exceed 1,140 tons/year. This limit is based on the allowable emissions under 35 IAC 214.304, for the maximum operating rates, with refinery fuel gas as the supplementary fuel in the pyroscrubber and 8.760 hours of operation per year. [T1]
- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].
- c. The above limitations were established in Permit 83080001, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification

pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.2.7 Testing Requirements

Pursuant to 35 IAC 218.988(a), when in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with Condition 7.2.3(e) (see also 35 IAC 218.986), the owner or operator of a VOM emission unit subject to the requirements of 35 IAC 218 Subpart TT shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105.

7.2.8 Monitoring Requirement

Pursuant to 35 IAC 218.105(d)(2)(A)(i), an owner or operator that uses an afterburner to comply with any Section of 35 IAC Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected calcining unit to demonstrate compliance with Conditions 5.5.1, 7.2.3, 7.2.5, and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of any required tests as required in Condition 7.2.7.
- b. Records of each afterburner subject to 7.2.8 showing installation, calibration, maintenance, operation in accordance to vendor specifications at all times when the afterburner is in use.
- c. The combustion chamber temperature of each afterburner subject to 7.2.8.
- d. Yearly fuel consumption of the affected calcining unit.
- e. Yearly throughput of the affected calcining unit.

- f. Yearly emissions of VOM, PM, SO₂, NO_x and HAPs from the affected calcining unit.
- g. The Permittee shall maintain records of excess emissions during malfunction and breakdown as allowed in Condition 7.2.11. As a minimum, these records shall include:
 - i. Date and duration of malfunction or breakdown.
 - ii. A full and detailed explanation of the cause for such emissions.
 - iii. The contaminants emitted and an estimate of the quantity of emissions.
 - iv. The measures used to reduce the quantity of emissions and the duration of the occurrence.
 - v. The steps taken to prevent similar malfunctions or breakdown or reduce their frequency and severity.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected calcining unit with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. The owner or operator of a subject VOM emission unit shall notify the Illinois EPA of any violation of the requirements of Condition 7.2.3(e) (see also 35 IAC 218 Subpart TT) by sending a copy of any record showing a violation to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.991(a)(3)(A)].
- b. Emissions of PM or SO₂ in excess of the limits in Condition 7.2.3(c), (d), or 7.2.6 within 30 days of such an occurrence.
- c. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours upon the occurrence of excess emissions due to malfunctions or breakdowns as allowed in Condition 7.2.11. The Permittee shall comply with all reasonable and safe directives of the regional office regarding such malfunctions and breakdowns. Within

five (5) working days of such occurrence, the Permittee shall give a written follow-up notice to the Illinois EPA's regional office providing an explanation of the occurrence, the length of time during which operation continued under such conditions, measures taken by the Permittee to minimize excess emissions and correct deficiencies, and when normal operation resumed. [T1]

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

- a. Operation in excess of applicable emission standards for the affected calcining unit is allowed during malfunction or breakdown of the rotary kilns, pyroscrubbers, and waste heat recovery boilers, provided that the feed to the kiln is reduced at a rate to ensure minimum on stream time, and all measures, such as use of off-shift labor is taken to minimize the quantity of air contaminant emissions and length of time during which such operation is continued. [T1]

7.2.12 Compliance Procedures

- a. Compliance provisions addressing Condition 7.2.3(c), (d), and (e) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of the affected calcining unit.
- b. Compliance with 7.1.8 is demonstrated by the recordkeeping requirements of 7.1.9(c) and (d).
- c. Compliance with the emission limits in Conditions 5.5.1 and 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

Emission factors for the affected calcining unit:

	Emission Factor
<u>Emission</u>	<u>(lb/ai Ton Feed)</u>
PM	0.1138
VOM	0.4204
NO _x	1.4495
SO ₂	2.5243
HAPs (HCL)	0.1517

These are emission factors determined for the affected calcining unit using stack test emission factors.

Appropriate Emissions (ton) = Throughput (ai ton) x The Appropriate Emission Factor (lb/ai ton feed) ÷ 2000 lb/ton

7.3 Unit 3 - Storage Tank

7.3.1 Description

The source operates a gasoline tank.

7.3.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
3	1,950 Gallon Gasoline Storage Tank (7153)	None

7.3.3 Applicability Provisions

- a. An "affected tank", for the purpose of these unit-specific conditions, is a storage tank described in Conditions 7.3.1 and 7.3.2.
- b. No person shall cause or allow the loading of any organic material in any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108, or unless such tank is a pressure tank as described in 35 IAC 218.121(a) or is fitted with a recovery system as describe in 35 IAC 218.122(b)(2) [35 IAC 218.122(b)]. Exception: If no odor nuisance exists then the limitation of 35 IAC 215.122(b) shall only apply when the tank is used to store a volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) [35 IAC 218.122(d)].
- c. The affected tank is subject to 35 IAC 218.583(c), which provides no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing operation unless:
 - i. The tank is equipped with a submerged loading pipe [35 IAC 218.583(a)(1)]; and
 - ii. The vapors displaced from the storage tank during filling are processed by a vapor control system that includes one or more of the following:

- A. A vapor collection system that meets the requirements of Condition 7.3.5(c) (see also 35 IAC 218.583(d)(4)) [35 IAC 218.583(a)(2)(A)]; or
 - B. A refrigeration-condensation system or any other system approved by the Illinois EPA and approved by the USEPA as a SIP revision, that recovers at least 90 percent by weight of all vaporized organic material from the equipment being controlled [35 IAC 218.583(a)(2)(B)]; and
 - C. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 IAC 218.584(b) or (d) [35 IAC 218.583(a)(2)(C)]; and
- iii. All tank vent pipes are equipped with pressure/vacuum relief valves with the pressure/vacuum relief valve shall be set to resist a pressure of at least 3.5 inches water column and to resist a vacuum of no less than 6.0 inches water column [35 IAC 218.583(a)(3)].
- d. The affected tank are subject to 35 IAC 218.585, which provides that:
- i. No person shall sell, offer for sale, dispense, supply, offer for supply, or transport for use in Illinois gasoline whose Reid vapor pressure exceeds the applicable limitations set forth in Conditions 7.3.3(d)(ii) and (d)(iii) (see also 35 IAC 218.585(b) and (c)) during the regulatory control periods, which shall be May 1 to September 15 for retail outlets, wholesale purchaser-consumer, operations, and all other operations [35 IAC 218.585(a)].
 - ii. The Reid vapor pressure of gasoline, a measure of its volatility, shall not exceed 9.0 psi (62.07 kPa) during the regulatory control period in 1990 and each year thereafter [35 IAC 218.585(b)].
 - iii. The Reid vapor pressure of ethanol blend gasoline shall not exceed the limitations for gasoline set forth in Condition 7.3.3(d)(ii) (see also 35 IAC 218.585(b)) by more than 1.0

psi (6.9 kPa). Notwithstanding this limitation, blenders of ethanol blend gasoline whose Reid vapor pressure is less than 1.0 psi above the base stock gasoline immediately after blending with ethanol are prohibited from adding butane or any product that will increase the Reid vapor pressure of the blended gasoline [35 IAC 218.585(c)].

7.3.4 Non-Applicability of Regulations of Concern

- a. Storage vessels with design capacity less than 75 m³ are exempt from the General Provisions of the NSPS and from the provisions of 40 CFR 60 Subpart Kb [40 CFR 60.110b(b)].
- b. The affected tank is not subject to the NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60 Subpart Kb, because the affected tank has a capacity less than 40 m³.
- c. The affected tank is not subject to the limitations of 35 IAC 218.120, Control Requirements for Storage Containers of VOL, pursuant to 35 IAC 218.119, because the affected tanks are used to store a petroleum liquid and the capacity is less than 151 m³ (40,000 gal).
- d. The affected tank is not subject to the requirements of 35 IAC 218.121, Storage Containers of VPL, pursuant to 35 IAC 218.123(a)(2), which exempts storage tanks with a capacity less than 151.42 m³ (40,000 gal).
- e. The affected tank is not subject to the requirements of 35 IAC 218.586, Gasoline Dispensing Operations - Motor Vehicle Fueling Operations, pursuant to 35 IAC 218.586(b), which exempts any gasoline dispensing operation which dispenses an average monthly volume of less than 10,000 gallons of motor vehicle fuel per month. Pursuant to 35 IAC 218.586(a)(1), average monthly volume means the amount of motor vehicle fuel dispensed per month from a gasoline dispensing operation based upon a monthly average for the 2-year period of November, 1990 through October, 1992 or, if not available, the monthly average for the most recent twelve calendar months. Monthly averages are to include only those months when the operation was operating.

7.3.5 Operational and Production Limits and Work Practices

- a. The affected tank shall only be used for the storage of gasoline.
- b. Pursuant to 35 IAC 218.583(c), each owner of a gasoline dispensing operation shall:
 - i. Install all control systems and make all process modifications required by Condition 7.3.3(b) (see also 35 IAC 218.583(a)) [35 IAC 218.583(c)(1)];
 - ii. Provide instructions to the operator of the gasoline dispensing operation describing necessary maintenance operations and procedures for prompt notification of the owner in case of any malfunction of a vapor control system [35 IAC 218.583(c)(2)]; and
 - iii. Repair, replace or modify any worn out or malfunctioning component or element of design [35 IAC 218.583(c)(3)].
- c. Pursuant to 35 IAC 218.583(d), each operator of a gasoline dispensing operation shall:
 - i. Maintain and operate each vapor control system in accordance with the owner's instructions [35 IAC 218.583(d)(1)];
 - ii. Promptly notify the owner of any scheduled maintenance or malfunction requiring replacement or repair of a major component of a vapor control system [35 IAC 218.583(d)(2)];
 - iii. Maintain gauges, meters or other specified testing devices in proper working order [35 IAC 218.583(d)(3)]; and
 - iv. Operate the vapor collection system and delivery vessel unloading points in a manner that prevents:
 - A. A reading equal to or greater than 100 percent of the LEL (measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B [35 IAC 218.583(d)(4)(A)]; and

- B. Avoidable leaks of liquid during the filling of storage tanks [35 IAC 218.583(d)(4)(B)].

7.3.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.3.7 Testing Requirements

- a. Pursuant to 35 IAC 218.583(a)(4), no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing operation unless the owner or operator of a gasoline dispensing operation demonstrates compliance with Condition 7.3.3(c)(iii) (see also 35 IAC 218.583(a)(3)), by March 15, 1995 or 30 days after installation of each pressure/vacuum relief valve, whichever is later, and at least annually thereafter, by measuring and recording the pressure indicated by a pressure/vacuum gauge at each tank vent pipe. The test shall be performed on each tank vent pipe within two hours after product delivery into the respective storage tank. For manifold tank vent systems, observations at any point within the system shall be adequate. The owner or operator shall maintain any records required by this Condition for a period of three years.
- b. Within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, repair and retest a vapor collection system which exceeds the limits of Condition 7.3.5(c)(4)(A) (see also 35 IAC 218.583(d)(4)(A)) [35 IAC 218.583(d)(5)].
- c. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the Reid vapor pressure of gasoline and the ethanol content of ethanol blend gasoline shall be determine according to the methods specified below:
 - i. Pursuant to 35 IAC 218.585(d), all sampling of gasoline required pursuant to the provisions of Conditions 7.3.7(c)(ii) and (c)(iii) (see also 35 IAC 218.585(e) and (f)) shall be conducted by one or more of the following approved methods or procedures:

- A. For manual sampling, ASTM D4057 [35 IAC 218.585(d)(1)];
 - B. For automatic sampling, ASTM D4177 [35 IAC 218.585(d)(2)]; or
 - C. Sampling procedures for Fuel Volatility, 40 CFR 80 Appendix D [35 IAC 218.585(d)(3)].
- ii. The Reid vapor pressure of gasoline shall be measured in accordance with either test method ASTM D323 or a modification of ASTM D323 known as the "dry method" as set forth in 40 CFR 80, Appendix E. For gasoline - oxygenate blends which contain water-extractable oxygenates, the Reid vapor pressure shall be measured using the dry method test [35 IAC 218.585(e)].
 - iii. The ethanol content of ethanol blend gasoline shall be determined by use of one of the approved testing methodologies specified in 40 CFR 80, Appendix F [35 IAC 218.585(f)].

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected tank to demonstrate compliance with Conditions 5.5.1, 7.3.3, 7.3.5, and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of the affected tank pursuant to Condition 7.3.7, which include the following [Section 39.5(7)(e) of the Act]:
 - i. The date, place and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and

- vi. The operating conditions as existing at the time of sampling or measurement.
- b. Design information for the tank showing the presence of a permanent submerged loading pipe;
- c. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe;
- d. The throughput of the affected tank, gal/mo and gal/yr; and
- e. The annual VOM emissions from the affected tank based on the material stored, the tank throughput, and the applicable emission factors and formulas with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Any storage of VOL in an affected tank that is not in compliance with the requirements of Conditions 7.3.3(b) and (c)(i) (see also 35 IAC 218.122(b) and 218.583(a)(1)), e.g., no "permanent submerged loading pipe," within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance;
- b. Any storage of VOL in an affected tanks that is out of compliance with the requirements of Conditions 7.3.3(b) and (c)(i) (see also 35 IAC 218.122(b) and 218.583(a)(1)) due to damage, deterioration, or other condition of the loading pipe, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance;

- c. Upon request by the Illinois EPA, the owner or operator of a gasoline dispensing operation which claims to be exempt from the requirements of 35 IAC 218.586 shall submit records to the Illinois EPA within 30 calendar days from the date of the request which demonstrate that the gasoline dispensing operation is in fact exempt; and
- d. The storage of any VOL or VPL other than the material specified in Condition 7.3.5(a) within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected tank without prior notification to the Illinois EPA 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 of the affected tank, provided the tank continues to comply with the Conditions of Section 7.3.5 of this permit.

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

For the purpose of estimating VOM emissions from the affected tank, the current version of the TANKS program is acceptable.

7.4 Product Handling Equipment

7.4.1 Description

Product handling equipment at this source consist of a bulk conveyor system, a barge loading process, and truck loading process. This equipment is used to move the coke throughout the source.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
4	Bulk Conveyor System and Truck Loading Process	Product Handling Baghouses (7040), (7350), (8040), (8454), (8361)
	Barge Loading Process	Product Handling Baghouse (7210)

7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected product handling equipment" for the purpose of these unit-specific conditions, are the process emission unit described in Conditions 7.4.1 and 7.4.2.
- b. The affected product handling equipment are subject to the emission limits identified in Condition 5.2.2.
- c. All unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods. [35 IAC 212.307]
- d. If particulate collection equipment is operated pursuant to 35 IAC 212.304 through 212.310 and 212.312, emissions from such equipment shall not exceed 68 mg/dscm (0.03 gr/dscf). [35 IAC 212.313]

7.4.4 Non-Applicability of Regulations of Concern

N/A

7.4.5 Operational and Production Limits and Work Practices

- a. The Permittee shall operate the barge loading process and product handling baghouse (7210) of the affected product handling equipment in accordance with Consent

Order 90 CH 7008 and in particular, the following Conditions from Consent Order 90 CH 7008:

- i. Redesign the baghouse to provide for an improved air-to-cloth ratio and improved suction;
- ii. Revised procedures for handling of needle coke by utilizing a petroleum wax dedusting agent to facilitate dust free handling;
- iii. Revised procedures for coke loading by utilizing a coke hauling trailer while the coke is being loaded for shipment to allow for continuous operation of the baghouse;
- iv. Revised outlet of baghouses fan to lessen the static pressure of the system and to lessen noise interference for operator and installation of additional access ports to the baghouse for more efficient cleaning;
- v. Installed plastic strips to doorways of truck pit building to minimize the movement of dust out from the building confines;
- vi. Skirted the transfer points of the coke loading conveyors to contain dust in the chutes and skirted the second incline of the conveyors of the exterior to increase dust containment;
- vii. Raised hood of truck pit hopper to above grade to prevent coke from covering openings and installed additional level switch to lessen drop height of coke from the trailers;
- viii. Rebuilt hood of truck pit hopper to eliminate rusted areas.
- ix. Developed a new procedure for the sealing of barge doors prior to loading and replace sealing on several barges to improve dust containment; and
- x. Improved barge loading chute by adding a special tarp to the chute and by incorporating a drawstring attachment.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected product handling equipment are subject to the following:

- a. Emissions of PM from the dust conveying system shall not exceed 9.4 tons/year. This limit is based on the maximum emission rate (2.14 lb/hr) and the maximum hours of operation (8.760 hr/yr) [T1].
- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].
- c. The above limitations were established in Permit 84100024, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirement

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected product handling equipment to demonstrate compliance with Conditions 5.5.1, 7.4.3, 7.4.5, and 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records showing compliance with the barge loading process and product handling baghouse (7210) of the affected product handling equipment in accordance with Consent Order 90 CH 7008.
- b. Monthly and yearly throughput in ai tons feed.
- c. Monthly and yearly emissions of PM from the affected product handling equipment.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected product handling equipment with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Emissions of PM in excess of the limits in Condition 7.4.3 or 7.4.6 within 30 days of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.4.12 Compliance Procedures

- a. Compliance provisions addressing Condition 7.4.3(c), and (d) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of the affected product handling equipment.
- b. Compliance with the emission limits in Conditions 5.5.1 and 7.4.6 shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:
 - i. Emission factors for the bulk conveying system and truck loading process of the affected product handling equipment:

	Emission Factor
Emission	(lb/ai Ton Feed)
PM	13.66

These are uncontrolled emission factors determined for the bulk conveying system and truck loading process of the affected product handling equipment using material balance calculations, a control efficiency of 97.7%, and maximum throughput of 175,362 ai ton feed.

Appropriate Emissions From The Bulk Conveying System and Truck Loading Process (ton) = Throughput (ai ton) x The Appropriate Emission Factor (lb/ai ton feed) (1 - 97.7%) ÷ 2000 lb/ton

- ii. Emission factors for the barge loading process of the affected product handling equipment:

	Emission Factor
<u>Emission</u>	<u>(lb/Tons Shipped)</u>
PM	5.73

These are uncontrolled emission factors determined for the barge loading process of the affected product handling equipment using material balance calculations, a control efficiency of 97.7%, and maximum throughput of 200,000 tons shipped.

Appropriate Emissions From The Barge Loading Process (ton) = Throughput (tons shipped) x The Appropriate Emission Factor (lb/tons shipped) (1 - 97.7%) ÷ 2000 lb/ton

- iii. Total emissions from the affected product handling equipment:

Total Emissions (ton) = Appropriate Emissions From The Bulk Conveying System and Truck Loading Process (ton) + Appropriate Emissions From The Barge Loading Process (ton)

7.5 Fugitive Emissions

7.5.1 Description

Fugitives at this source are from moving vehicles creating PM emissions on roads and storage piles.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
5	Storage Piles	---
	Traffic Areas	---

7.5.3 Applicability Provisions and Applicable Regulations

- a. The "affected fugitives" for the purpose of these unit-specific conditions, are the fugitives described in Conditions 7.5.1 and 7.5.2.
- b. The affected fugitives are subject to the emission limits identified in Condition 5.2.2.
- c. All conveyor loading operations to storage piles specified in 35 IAC 212.304 shall utilize spray systems, telescopic chutes, stone ladders or other equivalent methods in accordance with the operating program required by 35 IAC 212.309, 212.310 and 212.312. [35 IAC 212.305]
- d. All normal traffic pattern access areas surrounding storage piles specified in 35 IAC 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 IAC 212.309, 212.310 and 212.312. [35 IAC 212.306]

7.5.4 Non-Applicability of Regulations of Concern

- a. 35 IAC 212.304(a) does not apply because all storage piles of materials with uncontrolled emissions of fugitive particulate matter does not exceed 45.4 Mg per year (50 T/yr).

7.5.5 Operational and Production Limits and Work Practices

N/A

7.5.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirement

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected fugitives to demonstrate compliance with Conditions 5.5.1, 7.5.3(c), and 7.5.3(d), pursuant to Section 39.5(7)(b) of the Act:

- a. Records as specified in the operating program required by 35 IAC 212.309, 212.310 and 212.312.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected fugitives with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Emissions from the affected fugitive in excess of the limits specified in Condition 7.5.3 within 30 days of such an occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

Compliance with the emission limits in Conditions 5.5 is determined by the affected fugitives having potential emissions of PM of 1.32 ton/yr.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after April 19, 2000 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this

permit, provided that [Section 39.5(12)(a)(i) of the Act]:

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

8.5 Testing Procedures

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

of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

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

- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

- i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency (MC 40)
Bureau of Air
Compliance Section
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

iii. Illinois EPA - Air Permit Section (MC 11)

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

b. Other records required by this permit shall be retained for a period of at least 5 years from the

date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain

compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - Emissions of Particulate Matter from New Process Emission Units

10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

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

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

Where:

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

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

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

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

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

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

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

10.2 Attachment 2 - Emissions of Particulate Matter from Existing Process Emission Units

10.2.1 Process Emission Units for Which Construction or Modification Commenced Prior to After April 14, 1972

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

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

Where:

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

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

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

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

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

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

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

10.3 Attachment 3 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

JRC:jar

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

The Chicago Carbon Company is located at 12308 South New Avenue, Lemont.. The source 's function is to receive and calcine green (raw) petroleum coke. The plant has two rotary kilns that process two different types of petroleum coke. The calcining or heat treatment of green petroleum coke serves three main purposes: it removes impurities such as water and volatile matter from the coke, it densifies the coke and it coverts the coke into an electrically conductive material.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
1	K-1 Calcining Unit (7312)	April 1970	K-1 Cooler Multiclone (7025) K-1 Pyroscrubber (7009) K-1 Process Baghouse (7309) K-1 Dedust Application (7027)
2	K-2 Calcining Unit (8330)	April 1979	K-2 Cooler Multiclone (8025) K-2 Pyroscrubber (8009) K-2 Process Baghouse (8309) K-2 Dedust Application (8064)
3	1,950 Gallon Gasoline Storage Tank (7153)	May 1985	None
4	Bulk Conveyor System and Truck Loading Process	(K-1 Unit) April 1970 (K-2 Unit) April 1979	Product Handling Baghouses (7040), (7350), (8040), (8454), (8361)
	Barge Loading Process	(Green Coke) April 1970 (Calcined Coke) January 1979	Product Handling Baghouse (7210)
5	Storage Piles	---	---
	Traffic Areas	---	---

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	39
Sulfur Dioxide (SO ₂)	3,829
Particulate Matter (PM)	190
Nitrogen Oxides (NO _x)	187
HAP, not included in VOM or PM	32
TOTAL	4,277

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

JRC:jar