

217/782-2113

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

PERMITTEE

Amoco Petroleum Products - Chicago Terminal
Attn: Richard L. Swanson
4811 South Harlem Avenue
Forest View, Illinois 60402

<u>Application No.:</u> 95060058	<u>I.D. No.:</u> 031093AAH
<u>Applicant's Designation:</u>	<u>Date Received:</u> June 9, 1995
<u>Operation of:</u> Petroleum Bulk Terminal	
<u>Date Issued:</u> June 20, 2000	<u>Expiration Date</u> ² : June 20, 2005
<u>Source Location:</u> 4811 South Harlem Avenue, Forest View, Cook County	
<u>Responsible Official:</u> Richard L. Swanson, Terminal Manager	

This permit is hereby granted to the above-designated Permittee to operate a petroleum bulk terminal, 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 Mike Davidson at 217/782-2113.

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

DES:MED:psj

cc: Illinois EPA, FOS, Region 1

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

Amoco Petroleum Products - Chicago Terminal
4811 South Harlem Avenue
Forest View, Illinois 60402
708/749-5021

I.D. No.: 031093AAH
Standard Industrial Classification: 5171, Petroleum Bulk Stations
and Terminals

1.2 Owner/Parent Company

Amoco Oil Company
200 East Randolph Drive
Chicago, Illinois 60601

1.3 Operator

Amoco Petroleum Products - Chicago Terminal
4811 South Harlem Avenue
Forest View, Illinois 60402
708/749-5021

Richard L. Swanson, Terminal Manager
708/749-5021

1.4 General Source Description

Amoco Petroleum Products is located 4811 South Harlem Avenue in Forest View. The source is a petroleum bulk terminal for various petroleum products. Materials are transferred to the terminal by pipe line, tank truck or barge where they may be temporarily stored prior to shipment of the material to different destinations via tank truck, pipeline or barge.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATUs	Allotment Trading Units
BAT	Best Available Technology
bbl	Barrel
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
Cu in	cubic inch
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
ft ³	cubic foot
gal	Gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IFR	Internal Floating Roof
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kg	kilogram
kPa	kiloPascals
kW	kilowatts
LAER	Lowest Achievable Emission Rate
lb	pound
m ³	Cubic meters
m	meter
MACT	Maximum Achievable Control Technology
mg	Milligram
mm	Millimeter
mmBtu	Million British thermal units
mmBtu/hr	Million Btus per hour
ml	milliliter
mo	Month
MSDS	Material Safety Data Sheet
MTBE	Methyl tert-Butyl Ether
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards

NSR	New Source Review
OL	Organic Liquid
OM	Organic Material
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
psi	Pounds per square inch
psia	Pounds per square inch absolute
RMP	Risk Management Plan
SIC	Standard Industrial Classification
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
TANKS	USEPA Emission Estimating Program for Storage Tanks
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
VRU	Vapor Recovery Unit
wt	Weight
yr	year

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:

Underground Process Flow-Through Vessels (Tanks 6U and 7U)

Fire Fighting Water Tank (Tank 10)

Tank Cleaning

Barge Distillate Loading

Barge Unloading

An oil/water separator having VOM emissions of less than 1.0 lb/hr and individual HAP emissions of less than 0.1 lb/hr

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

None

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

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

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of

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

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

Note: The fixed roof tanks at the terminal storing distillate fuel are considered insignificant sources.
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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 Addition of Insignificant Activities

3.2.1 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).

3.2.2 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.

3.2.3 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	Emission Control Equipment
VPL Storage Tanks (See Attachment 1 for details)	Internal floating roof storage tanks	Floating roof with vapor mounted resilient seal or shoe mounted primary seal and rim-mounted secondary seal and permanent submerged fill
Ethanol Storage Tanks (See Attachment 1 for details)	Internal floating roof storage tanks	Floating roof, liquid mounted seal and permanent submerged fill
Tank truck loading rack	Five bay petroleum product truck loading rack	Vapor Recovery Unit
Barge Loading/Unloading Facility	Barge Loading	None
Fugitive emissions	Piping, valves, and pumps used to transfer materials between the pipe line storage tanks and loading/unloading rack	None

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 VOM emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.

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. 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.
- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm, pursuant to 35 IAC 214.301.

- 5.2.3 Pursuant to 35 IAC 218.585(a), (b), and (c), during the regulatory control periods of May 1 to September 15 of each year, no person shall sell, offer for sale, dispense, supply, offer for supply, or transport for use in Illinois gasoline, that has a Reid vapor pressure in excess of the following:

- a. Gasoline shall not exceed 9.0 psi (62.07 kPa); and
 - b. Ethanol blend gasoline's shall not exceed the limitations of (a) above by more than 1.0 psi (6.9 kPa). Notwithstanding this limitation, blenders of ethanol are prohibited from adding butane or any product that will increase the Reid vapor pressure of the blended gasoline.
- 5.2.4 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.
- 5.2.5 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.
- 5.2.6 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.

5.3 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the source not being subject to 40 CFR 63, Subpart R because the source is not a major source of HAPs. [40 CFR Section 63.420(a)] (See also Condition 5.5.)
- b. This permit is issued based on the source not being subject to 40 CFR 61, Subpart J because the pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels and storage tanks at the source are not in benzene service as defined in 40 CFR 61.111. (See also Condition 5.4)
- c. This permit is issued based on the source not being subject to 40 CFR 61, Subpart V because pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels at the source are not in volatile hazardous air pollutant service as defined in 40 CFR 61.241. (See also Condition 5.4)
- d. This permit is issued based on the source not being subject to 40 CFR 61, Subpart Y because the storage tanks at the source are not in benzene service nor do they store industrial grade benzene or refined benzene as defined in 40 CFR 61.270(a). (See also Condition 5.4)
- e. This permit is issued based on the source not being subject to 40 CFR 63, Subpart Y and 000 because the aggregate actual HAP emissions from the source is less than 10 tons of each individual HAP and 25 tons for all HAPs. (See also Condition 5.5.)

- f. This permit is issued based on the source not being subject to 40 CFR 68, because the materials stored at the source are fuels that are in distribution for use as fuel for internal combustion engines.

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:

- a. The pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels and storage tanks at the source shall not be used to process, store, unload or load any of the following:
 - i. A VOL containing vinyl chloride or benzene in excess of 10 percent by weight.

These limits are being established, pursuant to a request by the Permittee, in order to demonstrate the non-applicability of the rules referenced in Condition 5.3. Compliance is automatically demonstrated by the Permittee managing only petroleum products, ethanol, and the additives normally used in the management of petroleum products.

- b. The Permittee shall not exceed the following source wide limits
 - i. The MTBE concentration of reformulated and conventional gasoline at the source shall not exceed an annual average concentration of 7.6%. Based upon the analysis provided in the application MTBE is the primary HAP of concern in gasoline.

ii.

Gasoline Throughput	
<u>(gal/month)</u>	<u>(gal/year)</u>
100,000,000	540,000,000

These limits are being established, pursuant to a request by the Permittee, in order to demonstrate the source is not a major source for HAPs as referenced in Condition 5.5.2. Compliance with these limits shall be assured through the recordkeeping, reporting and compliance procedures shown in Conditions 5.6, 5.7, and 5.9, respectively.

- c. The Permittee shall inspect pumps and compressors for leaks on at least a monthly basis. If a significant leak is detected by any means, including visual observation, smell or sound, the pump or compressor shall be expeditiously repaired or taken out of service. For this purpose, action shall be considered expeditious if it occurs within 15 days. This requirement provides the basis for determining compliance with 35 IAC 218.142, as noted in section 5.10.
- d. During the regulatory control period, May 1 through September 15 of each year, the Permittee shall state that the Reid vapor pressure of all gasoline or ethanol blends leaving the source for use in Illinois complies with the Reid vapor limitations of Condition 5.2.3. Any operation receiving this gasoline shall be provided with documentation stating that the Reid vapor pressure of the gasoline complies with the Reid vapor pressure requirements of 35 IAC 218.585(b) and (c) (Condition 5.2.3).

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, at this location, 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)	153.4
Sulfur Dioxide (SO ₂)	---
Particulate Matter (PM)	1.3
Nitrogen Oxides (NO _x)	---
HAP, not included in VOM or PM	---
TOTAL	154.7

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Area source status for HAPs is due to

the gasoline throughput limitations at the gasoline loading rack and the on-site management of reformulated gasoline and conventional gasoline that does not contain MTBE (defined as having an MTBE concentration of 7.6% or less). The Permittee shall demonstrate that their area source status has not changed based on the following:

- a. Compliance with the throughput limitations contained within this permit shown in Condition 5.4, 7.3.6, and 7.3.7 and the recordkeeping, reporting and compliance procedures shown in Conditions 5.6, 5.7, 5.9, and 7.3.9(a), respectively;
- b. The availability of data that can demonstrate that the MTBE concentration of the gasoline managed at the terminal was 7.6% or less on an annual average. This data does not need to be maintained at the terminal if the analysis is performed off site. The data shall be produced upon agency request. The Permittee will have 30 days to produce the data after receipt of written agency request.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) do not apply to the source.

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 General Records for Storage Tanks

- a. Pursuant to Condition 5.8, the Permittee shall maintain a log or other record identifying how each tank is complying with the appropriate sections of this permit and the applicable requirement, if different than shown in Attachment 1, with date and supporting explanation for change in applicable requirements, pursuant to Section 39.5(7)(1)(i)(A) of the Act.
- b. The Permittee shall maintain records of the following items for each storage tank at the source with a capacity of 40 m³ (approximately 10,500 gallons) or greater [Section 39.5(7)(b) of the Act]. These records shall be kept up to date for each tank at the source and be retained until the tank is removed from the source.
 - i. The date* on which construction of the tank was commenced, with a copy of supporting documentation;
 - ii. The date(s)* on which modification or reconstruction, as defined in the NSPS, 40 CFR 60.14 and 60.15 respectively, were commenced on the tank, if applicable;
 - iii. A list of the types of materials actually stored in the tank, with date of each change in the list; and
 - iv. The dimensions of the tank and an analysis of capacity. [35 IAC 218.129(f) and 40 CFR 60.116b(b)]

* If a date is prior to June 11, 1973, a specific date is not needed and documentation need only show commencement of construction prior to this date.

5.6.3 Records for Floating Roof Storage Tanks

The Permittee shall maintain records of the following items for each storage tank equipped with a floating roof to allow calculation of emissions from the storage tanks at the source so as to demonstrate compliance with the annual emission limits in Condition 5.5. These records

shall be updated whenever there is a change in status of a storage tank that is brought about by actions at the source, such as painting, and during periodic inspections.

- a. The color of each storage tank;
- b. The condition of each storage tank; and
- c. The type and number of fittings . The use of a "typical" fitting count and type is appropriate and allowed in lieu of an actual fitting inventory.

5.6.4 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items to quantify annual VOM and HAP emissions, so as to demonstrate compliance with the limits in Condition 5.5:

- a. The Permittee shall maintain the following general records:
 - i. The identification and properties of each organic liquid stored at the source, as related to emissions, i.e., vapor pressure and molecular weight;
 - ii. The vapor weight percent of each HAP in the organic material emissions for each liquid determined as the average over the annual range of storage temperature and representative data on the composition of the liquid, with identification of supporting documentation, e.g., USEPA 1992 survey, typical concentrations based on analysis or engineering judgment, or maximum expected concentrations;
 - iii. A current analysis of the tank or tanks that would have the greatest working loss emissions of various liquids in the event that the Permittee does not choose to keep throughput records by individual tank, to identify the tank that should be assumed for emission calculations; and
- b. The Permittee shall maintain records of the following items on a monthly basis for the previous month:
 - i. The throughputs of each organic liquid through each tank or group of tanks, truck loading rack, and marine dock;

- ii. Total throughputs on a 12 month running basis for the tanks or group of tanks, truck loading rack, and marine dock calculated monthly by totaling the throughput for the previous month plus the throughput from the preceding 11 months, with supporting calculations.

5.6.5 Records for Operating Scenarios

If any storage tank identified in this permit as storing VPL (as defined in 35 IAC 211) changes to storage of materials with a vapor pressure of less than 0.5 psia at 70°F as provided for in Condition 5.8, the Permittee shall maintain a log identifying the liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to storage of VPL.

5.6.6 Records for Pump and Compressor Inspections

The Permittee shall keep the following records to document implementation of the leak detection and repair program required by Condition 5.4(c).

- a. The performance of an inspection or other observation identifying a leaking component, including, date, the individual that performed the inspection, and the type of inspection;
- b. The condition, i.e., idle or operation, of each pump or compressor inspected;
- c. The presence of a leak, with description and the means of identification;
- d. The date the leak was repaired, or the component taken out of service; and
- e. If a corrective action, as in Condition 5.4, was not taken within 15 days, an explanation why corrective action could not be taken in 15 days.

5.6.7 Records for Gasoline Volatility

Pursuant to 35 IAC 218.585(h)(2), the Permittee shall maintain records of the following items for gasoline and ethanol blends leaving the source for use in Illinois:

- a. Reid vapor pressure of each gasoline or ethanol blend shipment;

- b. Quantity of each gasoline or ethanol blend shipment;
- c. Date of delivery of each shipment; and
- d. Pursuant to 35 IAC 218.585(h), if these records are kept at the refinery supplying the gasoline to the terminal and can be produced upon request, the Permittee is not required to keep these records.

5.6.8 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 deviations of the source 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. Annual emissions from the source in excess of the emission limits specified in Condition 5.5.1 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.
- b. Any exceedance of the MTBE or gasoline throughput limits shown in 5.4(b).

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. The report shall include both VOM emissions and annual HAP emissions from the source.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to store petroleum liquids which are not defined as a VPL, see the definition in 35 IAC 211.7170. This means any petroleum liquid with a true vapor pressure of less than 1.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, may be stored in any storage tank identified in this permit as a VPL storage tank. In such instances, the unit-specific permit conditions in Section 7.0 of this permit, applicable to such tank based on the storage of VPL, shall no longer apply. 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 an emission unit, as defined in 35 IAC 201.102.

Upon resuming storage of VPL in such a tank, the applicable unit-specific conditions of Section 7.0 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of VPL, the Permittee shall conduct applicable inspection of the tank for storage of VPL.

5.9 General Compliance Procedures

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.

- a. Available data on the storage temperature may be used to determine the maximum true vapor pressure (See Condition 7). [35 IAC 218.128(b)]
 - i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
 - ii. For other liquids, the vapor pressure shall be:
 - A. Determined by ASTM Method D2879-83, incorporated by reference at Section 218.112(a)(1) of this Part;

- B. Measured by an appropriate method approved by the Illinois EPA and USEPA; or
 - C. Calculated by an appropriate method approved by the Illinois EPA and USEPA.
- b. For the purpose of estimating VOM emissions from the storage tanks, the most current version of the TANKS program is acceptable.
 - c. For the purpose of estimating fugitive PM emissions from paved and unpaved roads at the source shall be estimated based upon the most current factors available from USEPA (e.g., AP-42 Sections 13.2.1 and 13.2.2, respectively)
 - d. For the purpose of estimating HAP emissions from equipment at the source, the liquid weight percent or the vapor weight percent of each HAP, as appropriate, in the organic material emissions for each liquid determined as the average over the annual range of storage temperature and representative data on the composition of the liquid, with identification of supporting documentation, e.g., USEPA 1992 survey, typical concentrations based on analysis or engineering judgment, or maximum expected concentrations is acceptable.
 - e. Total VOM and HAP emissions at the source shall be determined as the sum of the respective VOM and HAP emissions from the tanks, the truck loading rack, barge loading, and fugitives (Conditions 7.1 through 7.4).

5.10 Special Permit Shield

The Permittee is hereby shielded from any obligation to measure the volume of leaking liquid from a pump or compressor for purposes of determining compliance with 35 IAC 218.142 as Condition 5.4(c) establishes appropriate compliance procedures for this rule that do not rely on such measurements.

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. 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 in 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 November 30 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 348 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 39.41 tons per season.
 - 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 during 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 during 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)]:

Tank 7
Tank 8
Tank 21
Tank 58
Tank 59

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit VPL Storage Tanks
Internal floating roof storage tanks

7.1.1 Description

The Permittee operates internal floating roof storage tanks to store various petroleum products.

The tanks previously operated as external-floating roof tanks are now considered to be internal floating roof tanks based upon the installation of the geodesic domed roof over the tanks.

7.1.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
14	Internal floating roof tank	Floating roof, vapor mounted resilient seal and a permanent submerged loading pipe
15	Internal floating roof tank	Floating roof, vapor mounted resilient seal, and a permanent submerged loading pipe
17	Internal floating roof tank	Floating roof, vapor mounted resilient seal, and a permanent submerged loading pipe
25	Internal floating roof tank	Floating roof, vapor mounted resilient seal, and a permanent submerged loading pipe
26	Internal floating roof tank	Floating roof, vapor mounted resilient seal, and a permanent submerged loading pipe
53	Internal floating roof tank	Floating roof, vapor mounted resilient seal, and a permanent submerged loading pipe
57	Internal floating roof tank	Floating roof, vapor mounted resilient seal, and a permanent submerged loading pipe
58*	Internal floating roof tank	Floating roof, mechanical shoe and rim-mounted secondary seal, and a permanent submerged loading pipe
59*	Internal floating roof tank	Floating roof, mechanical shoe and rim-mounted secondary seal, and a permanent submerged loading pipe

*Geodesic domed roof

7.1.3 Applicability Provisions

An "affected tank," for the purposes of these unit-specific conditions, is a storage tank subject to the requirements of 35 IAC 218.121, 218.122(b), and 218.123 that relies upon a permanent submerged loading pipe and internal floating roof for compliance. A storage tank is subject to the control requirements as follows:

- a. An affected storage tank is subject to the control requirements of 35 IAC 218.121 if it has a capacity greater than or equal to 40,000 gallons (151 m³) storing a VPL (as defined in 35 IAC 211.7170) with a vapor pressure of 10.34 kPa (1.5 psia) or greater at 294.3 °K (70 °F). (Internal floating roof - 35 IAC 218.121(b)(1))
- b. Unless exempted pursuant to 35 IAC 218.122(c), an affected storage tank is subject to the control requirements of 35 IAC 218.122 with a storage capacity of greater than 250 gal is required to be equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA. The Illinois EPA has not approved any alternative control. (Submerged Loading Pipe - 35 IAC 218.122(b))
- c. Unless exempted pursuant to 35 IAC 218.123(a), an affected storage tank that stores volatile petroleum liquid regulated under 35 IAC 218.121(b) is subject to the control requirements of 35 IAC 218.123(b). (Floating roof tank - 35 IAC 218.123(b))

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.1.2. The status of all storage tanks at this source, including affected tanks is summarized in Attachment 1.

7.1.4 Non-Applicable Regulations

- a. Each affected storage tank is not subject to the requirements of 40 CFR 60 Subpart K, Ka or Kb because the tanks were constructed prior to the date that the NSPS became applicable.
 - i. The following affected storage tanks are not subject to the requirements of 40 CFR 60 Subparts Kb since the installation of a geodesic domed roof on the tanks are not considered to be modifications. This

determination was made based upon the changes constituted greater control for the referenced vessels.

Tanks
58 and 59

- b. An affected tank is not subject to the requirements of 35 IAC Part 218, Subpart QQ or TT, because the affected tank is subject to 35 IAC 218, Subpart B. [35 IAC 218.940(a) and (b) and 218.980(a) and (b)]
- c. An affected tank is not subject to 35 IAC 218.120 because the internal floating roof tanks are used to store volatile petroleum liquids. Storage vessels that store volatile petroleum liquids are exempt from 35 IAC 218.120 under the provisions of 35 IAC 218.119(e).

7.1.5 Control Requirements

Each affected tank shall be equipped with the following:

- a. A floating roof which rests on the surface of the VPL and is equipped with a closure seal or seals between the roof edge and the tank wall. Such floating roof shall not be permitted if the VPL has a vapor pressure of 86.19 kPa (12.5 psia) or greater at 294.3° K (70° F). No person shall cause or allow the emission of air contaminants into the atmosphere from any gauging or sampling devices attached to such tanks, except during sampling or maintenance operations. [35 IAC 218.121(b)(1)]
- b. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 218.123(b)(2)]
- c. All openings of any floating roof deck, except stub drains, are equipped with covers, lids or seals such that: [35 IAC 218.123(b)(3)]
 - i. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank;
 - ii. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and

- iii. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.
- d. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected tank, except during sampling or maintenance operations [35 IAC 218.121 (b)(1)].
- e. A permanent submerged loading pipe. [35 IAC 218.122(b)]

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 Operating Requirements

None

7.1.8 Inspection Requirements

- a. The Permittee shall inspect the floating roof seals of each affected tank semiannually to insure compliance with the applicable control and operating requirements [35 IAC 218.123(b)(4)].
- b. The Permittee shall perform a complete inspection of the cover and seals of each affected tank whenever the tank is emptied for any reasons other than the transfer of liquid during the normal operation of the tank, or whenever repairs are made as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 218.123(b)(5)].

Note: Normal operation of the tank includes all operations for which the tank is designed and permitted including periods when empty and not opened and degassed for access, i.e., awaiting service.

7.1.9 Recordkeeping Requirements

- a. In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following items for each affected tank:

- i. A list of the types of volatile organic liquids stored on a monthly basis;
- ii. The maximum true vapor pressure of each type of liquid as stored, psia; and
- iii. The results of any inspections or measurements required by the Condition 7.1.8(a) and/or (b), including: [35 IAC 218.123(b)(6)]
 - A. Type of inspection;
 - B. When the inspection and/or measurement was performed;
 - C. Who performed the inspection and/or measurement;
 - D. The method of inspection and/or measurement;
 - E. The observed condition of each feature of the external floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement; and
 - F. Summary of compliance.
- iv. Records that are sufficient to identify whenever the tank is emptied for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations the affected control, 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 VPL in an affected tank that is not in compliance with the control requirements (due to absence of the features required by Condition 7.1.5, e.g., no permanent submerged loading pipe or a floating roof placed into service without proper seals, within 5 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.

- b. Any storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.1.5) due to damage, deterioration, or other condition of the tank, 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.

7.1.11 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 in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.4 of this permit.
- b. Changes accounted for in Condition 5.8.

7.1.12 Compliance Procedures

- a. For the purpose of demonstrating compliance with ERMS (Condition 6) emissions from each affected storage tank shall be determined through the use of the factors and protocols in the TANKS 3.0 program or other equivalent program using the same factor and protocols, as allowed in Condition 5.8.

7.2 Unit Ethanol Storage Tanks
Internal floating roof storage tanks

7.2.1 Description

The Permittee operates internal floating roof storage tanks to store ethanol. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.2.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
7	Internal floating roof tank	Floating roof, liquid mounted seal, and a permanent submerged loading pipe
8	Internal floating roof tank	Floating roof, liquid mounted seal and rim-mounted secondary seal, and a permanent submerged loading pipe
21	Internal floating roof tank	Floating roof, liquid mounted seal and rim-mounted secondary seal, and a permanent submerged loading pipe

7.2.3 Applicability Provisions

An "affected tank," for the purposes of these unit-specific conditions, is a storage tank subject to the requirements of 35 IAC 218.120(a) that relies upon a permanent submerged loading pipe and internal floating roof for compliance. A storage tank is subject to the control requirements as follows:

- a. An affected storage tank is subject to the control requirements of 35 IAC 218.120(a) if it has a capacity greater than or equal to 40,000 gallons (151 m³) storing a VOL with a vapor pressure of 5.19 kPa (0.75 psia) or more but less than or equal to a maximum true vapor pressure of 76.52 kPa (11.1 psia). (Internal floating roof - 35 IAC 218.120(a)(1))

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.2.2. The status of all storage tanks at this source, including affected tanks is summarized in Attachment 1.

7.2.4 Non-Applicable Regulations

- a. Each affected storage tank is not subject to the requirements of 40 CFR 60 Subpart K, Ka or Kb because the tanks were constructed prior to the date that the NSPS became applicable.
- b. The following affected storage tanks are not subject to the requirements of 40 CFR 60 Subparts Kb since the changes referenced in the following construction permits are not considered to be modifications. This determination was made based upon the changes as referenced in the construction permit, i.e., installation of internal floating roof inside existing fixed roof tank, constituted greater control for the referenced vessels

Tanks	Construction Permit
7 & 21	94080003
8	95100032

This determination supercedes the determination made in the above referenced construction permits.

- c. An affected tank is not subject to the requirements of 35 IAC Part 218, Subpart QQ or TT, because the affected tank is subject to 35 IAC 218, Subpart B. [35 IAC 218.940(a) and (b) and 218.980(a) and (b)]
- d. An affected tank is not subject to the requirements of 35 IAC 218.121, Storage Containers of VPL, and 218.123, Petroleum Liquid Storage Tanks, because the affected tanks store only ethanol and not volatile petroleum liquids. [35 IAC 211.7170]
- e. An affected tank is not subject to the requirements of 35 IAC 218.122, Loading Operations, if no odor nuisance exists the limitations of 35 IAC 218.122 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3 °K (70 °F). [35 IAC 218.122(c)]

7.2.5 Control Requirements

Each affected tank shall be equipped with the following:

- a. An internal floating roof which shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof

shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [35 IAC 218.120(a)(1)(A)]

b. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof [35 IAC 218.120(a)(1)(B)]:

i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank;

ii. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous; or

iii. A mechanical shoe seal, which is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

c. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. [35 IAC 218.120(a)(1)(C)]

d. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and

automatic gauge float well shall be bolted except when they are in use [35 IAC 218.120(a)(1)(D)]

- e. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [35 IAC 218.120(a)(1)(E)]
- f. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [35 IAC 218.120(a)(1)(F)]
- g. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [35 IAC 218.120(a)(1)(G)]
- h. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [35 IAC 218.120(a)(1)(H)] and

7.2.6 Emission Limitations

- a. In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected emission units, Storage Tanks 7, 8, and 21, are subject to the following:

Emissions from each of the following affected storage tanks (i.e., Storage Tanks 7, 8, and 21) shall not exceed the following limits:

VOM	
<u>(Lb/hr)</u>	<u>(Ton/Year)</u>
0.13	0.57

These limits are based on the compliance procedures referenced in Condition 7.2.12.

Compliance with annual emission limits shall be demonstrated on a monthly basis from the sum of the throughput data for the current month plus the preceding 11 months (running 12 month total) as required in Condition 7.2.7.

The above limitations contain revisions to previously issued Permits 94080003 (Tanks 7 and 21) and 95100032

(Tank 8). The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the previous emissions limitations on Storage Tank 7, 8, and 21, as established in Permits 94080003 (Tanks 7 and 21) and 95100032 (Tank 8), i.e., the previous limits of 0.1 lb hr and 0.44 ton/year, have been revised based upon the latest USEPA calculation procedures and the maximum VOL throughputs indicated in the CAAPP application. [T1R].

- b. There are also source wide limitations in Condition 5.5 that include this unit.

7.2.7 Operating Requirements

- a. The affected tanks are limited to the storage of denatured ethanol.
- b. The vapor pressure of the organic materials, stored in the affected storage tanks shall not exceed 0.87 psia at 70°F. This is the maximum vapor pressure expected from the storage of ethanol. Compliance shall be demonstrated by limiting the tanks to the storage of ethanol [see Condition 7.2.7(a)].
- c. Operation of the affected storage tanks (Storage Tanks 7, 8, and 21) shall not exceed the following limits:

Ethanol Throughput Combined	
<u>(gal/month)</u>	<u>(gal/year)</u>
17,427,665	174,276,646

Compliance with these limits is based on the recordkeeping requirements in Condition 5.6.4(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).

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit VOM emissions from the affected storage tanks below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

7.2.8 Inspection Requirements

- a. For each affected storage tank, used to store VOLs (See Condition 7.2.7), the Permittee shall verify compliance with the requirements of 35 IAC 218.120(a)(1) by visually inspecting the applicable storage tank as follows:
 - i. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service) prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel. [35 IAC 218.127(a)(1)]
 - ii. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the Permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or if there is liquid accumulated on the roof, or if the seal is detached, or if there are holes or

tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure is detected during the required inspections cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, the owner or operator may request a 30-day extension from the Illinois EPA in the inspection report required in Condition 7.2.10. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the owner or operator will take that will assure that the control equipment will be repaired or the vessel will be emptied within 60 days. [35 IAC 218.127(a)(2)]

- iii. For vessels equipped with both primary and secondary seals, the Permittee shall visually inspect the affected storage tanks as follows: [218.127(a)(3)]
 - A. In accordance with the requirements of 7.2.8(a)(iv) below at least every 5 years; or
 - B. In accordance with the requirements of 7.2.8(a)(i) above at least once every 12 months.

- iv. The Permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes, and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal, or if the seal fabric or the secondary seal has holes, tears, or other openings in the seal, or if the seal fabric or the gaskets no longer close off the liquid surfaces from the atmosphere, or if the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified above exists before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual

visual inspection as specified in Condition 7.2.8(c)(i) and 7.2.8(c)(ii)(B) above and at intervals no greater than 5 years in the case of vessels specified in Condition 7.2.8(c)(ii)(A) above. [35 IAC 218.127(a)(4)]

7.2.9 Recordkeeping Requirements

- a. In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following items for each affected tank, pursuant to 35 IAC 218.129(a):
 - i. Keep a record of each inspection performed as required by Condition 7.2.8. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings) [35 IAC 218.129(a)(2)];
 - ii. If any of the conditions described in Section 218.127(a)(2) of this Subpart are detected during the annual visual inspection required by Section 218.127(a)(2), report to the Agency within 30 days after the inspection the identity of the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made [35 IAC 218.129(a)(3)]; and
 - iii. After each inspection required by Section 218.127(a)(3) of this Subpart where holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in Section 218.127(a)(3)(B) of this Subpart are discovered, report to the Agency within 30 days after the inspection the identity of the storage vessel and the reason it did not meet the specifications of Section 218.120(a)(1) or (2) or Section 218.127(a) of this Subpart, and list each repair made [35 IAC 218.129(a)(3)].

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control,

operating, or inspection requirements, as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. If any of the conditions described in Section Condition 7.2.8(a)(ii) are detected during the annual visual inspection required by Condition 7.2.8(a)(ii), report to the Agency within 30 days after the inspection the identity of the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made [35 IAC 218.129(a)(3)]; and
- b. After each inspection required by Condition 7.2.8(a)(ii)(B) where holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in Condition 7.2.8(c)(i) are discovered, report to the Agency within 30 days after the inspection the identity of the storage vessel and the reason it did not meet the specifications of Condition 7.2.5, and list each repair made [35 IAC 218.129(a)(3)].

7.2.11 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 accounted for in Condition 5.8.

7.2.12 Compliance Procedures

- a. For the purpose of demonstrating compliance with ERMS (Condition 6) emissions from each affected storage tank shall be determined through the use of the factors and protocols in the TANKS 3.0 program or other equivalent program using the same factor and protocols, as allowed in Condition 5.8.

7.3 Unit Truck Loading Rack
Control: Vapor Recovery Unit

7.3.1 Description

The truck loading rack is used to load various petroleum products that include gasoline and distillates, and ethanol. The loading rack consists of five loading bays. The VOM emissions from the truck loading rack occur when material is loaded into delivery vehicles. A vapor recovery unit is used to capture and recover the emissions that occur as a result of displacement of vapors in the delivery vehicles during gasoline loading, ethanol loading and distillate loading into compartments that held gasoline as the immediately previous load.

Unloading of material occurs at various sites at the terminal. The VOM emissions from unloading material are accounted for in the working losses of the storage tanks the material is loaded into, with the exception of fugitive emissions that are attributed to leaking components, i.e., valves, flanges, ...etc.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Date of Construction
Loading Racks with Vapor Recovery	Five bay loading rack used for loading various petroleum products into tank trucks	Vapor Recovery Unit (C01)	Loading Rack: 1989 VRU: 1979

7.3.3 Applicability Provisions and Applicable Regulations

An "affected loading rack," for the purpose of these unit-specific conditions, is a loading rack used to transfer petroleum products into a tank truck.

- a. Each affected loading rack at the source used to transfer VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294°K (70°F), e.g., gasoline, is subject to 35 IAC 218.122(a), which requires that:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gal/day) into any

railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108. [35 IAC 218.122(a)]

Since no odor nuisance exists the limitations of this Condition shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294°K (70°F), e.g., gasoline [35 IAC 218.122(c)]

In this case the Permittee relies on a vapor collection/recovery unit for compliance.

- b. Each affected loading rack at the source used to transfer gasoline into a delivery vessel (gasoline tank truck) is subject to 35 IAC 218.582.
- c. Each affected loading rack at the source used to transfer gasoline into a delivery vessel (gasoline tank truck) is subject to 40 CFR 60 Subpart XX - Standards of Performance for Bulk Gasoline Terminals because the affected loading racks were modified after December 17, 1980. The vapor collection/recovery unit is classified as an "existing vapor processing system", as per the definition in 40 CFR 60.501, since the system was constructed prior to December 17, 1980.

7.3.4 Non-Applicability of Regulations of Concern

The affected truck and trailer loading racks are not be subject to 35 IAC Part 218, Subpart TT, because they are subject to 35 IAC 218, Subpart Y [35 IAC 218.980(a) and (b)]

7.3.5 Control Requirements and Operational Limitations

- a. The total organic compound emissions from the affected loading rack and associated vapor recovery unit shall not exceed 40 milligrams per liter of material loaded, pursuant to Sections 9.1(d) and 39 of the Act, so that the operation of this loading rack and vapor collection/recovery unit is not a major source for HAP subject to 40 CFR 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).

This condition supersedes 35 IAC 218.582(a)(1) and 40 CFR 60.502(c) which requires that each affected loading rack be equipped and operated with a vapor control system that limits emissions of VOM to not more than 80 milligrams per liter (0.00067 lb/gal) of gasoline loaded from tank trucks during product loading.

b. State regulations:

i. The Permittee shall not cause or allow the transfer of gasoline into any delivery vessel from any bulk gasoline terminal unless:

A. The bulk gasoline terminal is equipped with a vapor control system as described in Condition 7.3.7(a); [35 IAC 218.582(a)(1)]

B. The vapor control system is operating and all vapors displaced in the loading of gasoline to the delivery vessel are vented only to the vapor control system; [35 IAC 218.582(a)(2)]

C. There is no liquid drainage from the loading device when it is not in use; [35 IAC 218.582(a)(3)]

D. All loading and vapor return lines are equipped with fittings which are vapor tight; [35 IAC 218.582(a)(4)] and

E. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 IAC 218.584(b) or (d); or, if the terminal is driver-loaded, the terminal owner or operator shall be deemed to be in compliance with this Condition when terminal access authorization is limited to those owners and/or operators of delivery vessels who have provided a current certification as required by 35 IAC 218.584(c)(3). [35 IAC 218.582(a)(5)]

ii. The Permittee shall:

A. Operate the terminal vapor collection system and gasoline loading equipment in a manner that prevents [35 IAC 218.582(b)(1)]:

1. Gauge pressure from exceeding 18 inches of water and vacuum from exceeding 6 inches of water as measured as close as possible to the vapor hose connection; and
2. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B, incorporated by reference in 35 IAC 218.112; and
3. Avoidable leaks of liquid during loading or unloading operations.

B. Provide a pressure tap or equivalent on the terminal vapor collection system in order to allow the determination of compliance with Condition 7.3.7(b)(ii)(1)(A) [35 IAC 218.582(b)(2)]; and

C. 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 7.3.7(b)(ii)(1)(A) or (B). [35 IAC 218.582(b)(3)]

"Delivery vessel" means any tank truck or trailer equipped with a storage tank that is used for the transport of gasoline to a stationary storage tank at a gasoline dispensing operation, bulk gasoline plant, or bulk gasoline terminal. [35 IAC 211.1730]

c. Federal regulations:

- i. All loading racks at the source which delivers liquid product into gasoline tank trucks shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading. [40 CFR 60.502(a)]
- ii. Each vapor collection system shall be designed to prevent any total organic compounds vapors

collected at one loading rack from passing to another loading rack. [40 CFR 60.502(d)]

iii. Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: [40 CFR 60.502(e)]

A. The owner or operator shall obtain the vapor tightness documentation described in Condition 7.3.9(b)(i) (40 CFR 60.505(b)) for each gasoline tank truck which is to be loaded at the source.

B. The owner or operator shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the source.

C. 1. The owner or operator shall cross-check each tank identification number obtained in Condition 7.3.7(c)(iii)(B) of this section with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:

I. If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or

II. If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.

2. If either the quarterly or semiannual cross-check provided in Condition 7.3.7(c)(iii)(c)(i)(I) through (II) that these conditions

were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.

- D. The terminal owner or operator shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the source within 1 week of the documentation cross-check in Condition 7.3.7(c)(iii)(C).
- E. The terminal owner or operator shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the source until vapor tightness documentation for that tank is obtained.
- F. Alternate procedures to those described in Condition 7.3.7(c)(iii)(C) for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Illinois EPA. [At this time the Illinois EPA has not approved any alternative procedures]

"Vapor-tight gasoline tank truck" means a gasoline tank truck which has demonstrated within the 12 preceding months that its product delivery tank will sustain a pressure change of not more than 750 pascals (75 mm of water \approx 3 inches of water) within 5 minutes after it is pressurized to 4,500 pascals (450 mm of water \approx 18 inches of water). This capability is to be demonstrated using the pressure test procedure specified in Reference Method 27. [40 CFR 60.501]

- iv. The owner or operator shall act to assure that loadings of gasoline tank trucks at the source are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [40 CFR 60.502(f)]
- v. The owner or operator shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the source. Examples of actions to accomplish

this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. [40 CFR 60.502(f)]

- vi. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water ≈ 18 inches of water)) during product loading. This level is not to be exceeded when measured by the procedures specified in §60.503(d). [40 CFR 60.502(h)]
- vii. No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water ≈ 18 inches of water)). [40 CFR 60.502(i)]
- d. Pursuant to the requirements of Condition 7.3.7(b)(i)(5) and 7.3.7(c), no person shall cause or allow the transfer of gasoline into any delivery vessel unless the vessel has been certified annually, as per 35 IAC 218.584(a)(6), to sustain:
 - i. A pressure drop of no more than three inches of water (≈ 75 mm of water) in five minutes; and
 - ii. A vacuum drop of no more than three inches of water (≈ 75 mm of water) in five minutes.

7.3.6 Emission Limitations

- a. In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected loading rack are subject to the following:

Emissions from the affected loading rack during the loading of gasoline shall not exceed the following limits:

Material <u>Loaded</u>	VRU VOM Emission Rate	VOM Emissions	
		<u>Ton/Mo</u>	<u>(Ton/Year)</u>
Gasoline	40 mg/liter	22.5	90.1

These limits are based on the VRU emission rate referenced in Condition 7.3.5(a), the operational

limits referenced in Condition 7.3.7(b), and the compliance procedures referenced in Condition 7.3.12.

Compliance with annual limits shall be demonstrated on a monthly basis from the sum of the throughput data for the current month plus the preceding 11 months (running 12 month total) as required by Condition 7.3.7.

The above limitations contain revisions to previously issued Permit 73040533. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the previous emissions limitations the loading rack and VRU unit, as established in Permit 73040533, i.e., the previous limits of 55 milligrams per liter, 16.1 ton per month, and 96.1 tons per year, has been revised based upon the limitation provided in Condition 5.1.2 and the maximum gasoline indicated in Conditions 5.4(b) and 7.3.7(b). [T1R].

- b. There are also source wide limitations in Condition 5.5 that include this unit.

7.3.7 Operating Requirements

- a.
 - i. The Permittee is allowed to load distillates, ethanol and gasoline at the loading rack.
 - ii. The VRU is required to be used when loading a gasoline tank truck, meaning a delivery tank truck which is loading gasoline or which has loaded gasoline on the immediately previous load. [40 CFR 60.501] The VRU is also required for ethanol loading.

- b. Operation of the loading rack shall not exceed the following limits:

Gasoline Throughput	
<u>(gal/month)</u>	<u>(gal/year)</u>
100,000,000	540,000,000

These limits are based on the recordkeeping requirements in Condition 7.3.9.

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).

The above limitations contain revisions to previously issued Permit 73040533. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the previous emissions limitations established in Permit 73040533, i.e., the previous gasoline throughput limit of 420,000,000 gal/yr, has been revised. [T1R].

7.3.8 Inspection and Monitoring Requirements

- a. The Permittee shall use an Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the VRU is in use. The type monitor and its use shall be approved by the Illinois EPA according to the compliance schedule in Condition 7.3.13.

The continuous monitoring equipment must monitor the VOM concentration of each carbon adsorption bed exhaust or the exhaust of the bed next in sequence to be desorbed. [35 IAC 218.105(d)(2)(A)(iii)].

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

7.3.9 Recordkeeping Requirements

- a. General Recordkeeping

The Permittee shall maintain records of the following for each affected loading rack to demonstrate compliance with Conditions 5.5.1, 7.3.5(c), 7.3.6(a) and (b) and 7.3.7(h):

- i. The identification and properties of petroleum liquid and ethanol distributed through each affected loading rack, as related to emissions, i.e., vapor pressure and molecular weight;
- ii. The amount of petroleum liquid and ethanol distributed through each affected loading rack, in gallon per month and year, with annual records updated each month by totaling the throughput for that month plus the preceding 11 months; and

- b. Federal Required Records

- i. The tank truck vapor tightness documentation required under Condition 7.3.5(c)(iii)(1) (40 CFR 60.502(e)(1)) shall be kept on file at the terminal in a permanent form available for inspection. [40 CFR 60.505(a)]
- ii. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall

include, as a minimum, the following information: [40 CFR 60.505(b)]

- A. Test title: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27.
 - B. Tank owner and address.
 - C. Tank identification number.
 - D. Testing location.
 - E. Date of test.
 - F. Tester name and signature.
 - G. Witnessing inspector, if any: Name, signature, and affiliation.
 - H. Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).
- iii. A record of each monthly leak inspection required under Condition 7.3.8(b) (40 CFR 60.502(j)) shall be kept on file at the terminal. Inspection records shall include, as a minimum, the following information: [40 CFR 60.505(c)]
- A. Date of inspection.
 - B. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
 - C. Leak determination method.
 - D. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
 - E. Inspector name and signature.
- iv. The Permittee shall keep documentation of all notifications required under Condition 7.3.5(c)(iii)(4) (40 CFR 60.502(e)(4)) on file at the terminal. [40 CFR 60.505(d)]
- v. The Permittee shall keep records of all replacements or additions of components

performed on an existing vapor processing system. [40 CFR 60.505(f)]

- vi. All records are required to be retained for 5 years as required under Condition 9.6.3.

c. Records of Operations

The Permittee shall maintain records of the following for the affected loading rack and associated vapor recovery unit to demonstrate compliance with Conditions 7.3.5 and 7.3.7:

- i. The use of an affected loading rack for loading of any gasoline tank truck when the associated VRU was operating at parameters outside of those deemed acceptable, including:
 - A. The date and time of the loading;
 - B. The specific problem with the VRU monitor;
 - C. Type of material loaded; and
 - D. The reason that loading occurred even though the VRU was not operating.
- ii. The use of an affected loading rack for the loading of any nonvapor-tight gasoline tank (one not meeting the requirements of Condition 7.3.7) or a delivery vessel that does not display the appropriate sticker or has not provided a current certification (one not meeting the requirements of Condition 7.3.7), including:
 - A. The date and time of the loading;
 - B. The specific reason the vessel did not meet the requirements of Condition 7.3.7;
 - C. Type of material loaded; and
 - D. The reason why loading was allowed.

7.3.10 Reporting Requirements

- a. Semi-Annual Report

The Permittee shall provide a semi-annual monitoring report pursuant to section 8.6, which includes the following:

- i. The monthly and annual throughputs for each affected loading rack for each month of the previous 12 month period sufficient to demonstrate compliance with the 12 month running total of Condition 7.3.7(i), gallons/month and gallons/year (e.g., for the annual totals, for the month of January, the throughput from February of the preceding year through January, for the month of February, the throughput from March of the preceding calendar year through February, 12 months in all);
- ii. Summarization of any use of an affected loading rack to load delivery vessels (gasoline tank trucks) into trucks that did not meet the requirements of Conditions 7.3.7, including:
 - A. The date and time of the loading;
 - B. The specific reason the vessel did not meet the requirements of Condition 7.3.7;
 - C. Type of material loaded; and
 - D. The reason why loading was allowed.
 - E. If no loading of trucks that did not meet the requirements of Conditions 7.3.7 occurred, then the Permittee can just note in the semi-annual report that all trucks that were loaded met the requirements of 7.3.7.
- iii. Summary of any use of an affected loading rack when the associated VRU was operating at parameters outside of those deemed acceptable under section 7.3.8(a, including:
 - A. The date and time of the loading;
 - B. The specific problem with the VRU;
 - C. Type of material loaded; and

- D. The reason that loading occurred even though the VRU was not operating.
 - E. If no loading occurred when the VRU was operating at parameters outside of those deemed acceptable, then the Permittee can just note in the semi-annual report that all loading occurred per the requirements of 7.3.8.
- v. A summary of times when the continuous monitoring equipment was not functioning while gasoline was being loaded at the truck loading rack, including:
- A. Date and time of occurrence; and
 - B. Specific problem associated with the indicator or recording equipment.
 - C. Monitor downtime that occurs when gasoline is not being loaded is not to be reported.

c. Reporting of Non-compliance

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limits as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Notification within 15 days of operation of the affected loading rack and/or associated vapor recovery unit in excess of the limitations of Condition 7.3.6(a), 7.3.6(b) or 7.3.5(c).

d. Reporting of Malfunction or Breakdown

The Permittee shall promptly notify the Illinois EPA, Maywood Region Office on the same or next working day of any malfunction or breakdown of any vapor recovery unit, documenting the time of occurrence and type of malfunction or breakdown. The Permittee shall also submit a quarterly report summarizing the quantity of emissions, the type and duration of each malfunction and the steps taken to reduce the occurrence of each malfunction or breakdown.

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 loading

rack 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:

The Permittee may use the documentation prepared pursuant to the annual tank truck certification testing required under 40 CFR 63 Subpart R. Based upon a review of the requirements under 40 CFR 63 Subpart R, i.e., the annual certification testing (40 CFR 63.425(e)) and recordkeeping requirements (40 CFR 63.428(b)(3)f), has been deemed as stringent as that required under 35 IAC 218.584(e) and 40 CFR 60.502(e).

7.3.12 Compliance Procedures

- a. Compliance with the emission limitations of Condition 7.3.6(a) and (b) and the operating requirements of Condition 7.3.7 shall be demonstrated through the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.3.8, 7.3.9, and 7.3.10.
- b. Compliance with the control requirements of 7.3.5(a) and (b) shall be demonstrated by the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.3.8, 7.3.9, and 7.3.10 and the fact that compliance of the affected loading rack and associated vapor recovery unit have previously been demonstrated by fulfillment of the test requirements of 40 CFR 60.8 by measurement of the total organic concentration(s) in the effluent stream of the vapor recovery system pursuant to 40 CFR 60.503.
- c. For the purpose of demonstrating compliance with the source wide limits in Condition 5.5 and the ERMS emissions limits in Condition 6, VOM emissions from the loading rack shall be determined by use of the following equation:

$$\text{Total Emissions (lbs)} = \sum_{i=1} \text{EF}_i \times V_i$$

Where:

EF_i = The emission factor listed below.

For the purpose of estimating distillate loading VOM emissions at the source, the

emission factors calculated or found in Section 5.2 of AP-42, published by USEPA or the best available emission factors, including factors developed by the source, are acceptable.

For the purpose of estimating gasoline loading VOM emissions from the VRU, the emission factors (0.00027554 lb/gallon or 33.82 mg/liter) is the emission rate determined from the VRU's most recent stack test at the time of permit issue. Emission rates determined in any subsequent stack test should be used in lieu of the factor listed here.

For the purpose of estimating ethanol loading VOM emissions from the VRU, the emission factors (0.0129 lb/1,000 gallons) is determined using factors calculated or found in Section 5.2 of AP-42, published by USEPA or the best available emission factors, and the efficiency of the VRU as determined from data from the VRU's most recent stack test at the time of permit issue. Emission rates should be re-determined if any subsequent stack test is performed.

Product	EF
Gasoline	0.00027554 lb/gallons
Ethanol	0.0129 lb/1,000 gallons
Distillates	0.0184 lb/1,000 gallons

V_i = Volume of gasoline or distillate as recorded in the records required by Condition 7.4.9.

7.3.13 Compliance Schedules

- a. The Illinois EPA has determined that loading rack VRU is not in compliance with the monitoring requirements of 35 IAC 218.105(d)(2)(A). Therefore, the permit shield in Section 8.1 does not shield the Permittee from possible enforcement actions initiated by either USEPA or the Illinois EPA involving the above named emission units or activities. Compliance with the terms of this permit does not serve as proof of compliance for the VRU. The Permittee shall, if needed, apply for revision of this permit to address the resolution of any such enforcement action or other outstanding issue initiated pursuant to the alleged violations of 35 IAC 218.105(d)(2)(A). (e.g.,

include a new compliance schedule, identify appropriate applicable requirements, establish new requirements, and revise the ERMS baseline)

- b. The Permittee shall comply with the following schedule of compliance to address compliance with the alleged violations of 35 IAC 218.105(d)(2)(A):

Milestone	Timing
The Permittee shall submit a plan for Illinois EPA approval to achieve full compliance with 35 IAC 218.105(d)(2)(A) (See Condition 7.3.8). The submittal shall include FORM 294-CAAPP.	The plan shall be submitted no later than 90 days from the date issued of this permit. The plan shall reflect the date on which full compliance shall be achieved and interval milestones (e.g., purchase, installation, testing...).
The Permittee shall achieve full compliance with all requirements resulting from resolution of enforcement issues regarding the alleged violation of 35 IAC 218.105(d)(2)(A)	No later than any schedule established pursuant to resolution of any pending or future enforcement action pertaining to the alleged violation of 35 IAC 218.105(d)(2)(A)

The plan submitted for Illinois EPA approval shall describe the type of monitor to be used (i.e., a breakthrough monitor), the values to be used to determine compliance with 7.3.5(a) (i.e., the average value and averaging time to be used to determine if breakthrough has occurred), and the schedule for acquisition of the monitor and installation.

The Permittee is not responsible for delays on the part of the Illinois EPA to approve the plan. Excluding any supplementary schedule established pursuant to any pending or future enforcement action, actions on the part of the Illinois EPA will not count against any schedule included in the plan.

- c. Submittal of Progress Reports

A Progress Report shall be submitted every six months, beginning six months from the date of

issuance of this permit to the Illinois EPA Compliance Section. The Progress Report shall contain at least the following:

- i. The required timeframe for achieving the milestones in the schedule for compliance, and actual dates when such milestones were achieved.
 - ii. An explanation of why any required timeframe in the schedule of compliance was not met, and any preventive or corrective measures adopted.
 - iii. If desired, the Permittee may submit the first and subsequent progress reports with the semiannual report required under 7.3.10(a) and 8.6.1.
- d. The Permittee shall submit a written notification to the Illinois EPA Compliance Section with 15 days of coming into full compliance with 35 IAC 218.105(d)(2)(A).

7.4 Unit Barge Facility
Control: None

7.4.1 Description

The barge facility is used to load distillate and interface and unload ethanol and petroleum products. Barge loading does not include gasoline as defined in 35 IAC 211. The VOM emissions from the barge loading occur, as a result of displacement of vapors in the barges, during loading.

The VOM emissions from unloading material are accounted for in the working losses of the storage tanks the material is loaded into, with the exception of fugitive emissions that are attributed to leaking components, i.e., valves, flanges, etc.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Date of Construction
Barge Facility	Barge loading of interface product and distillates	None	Loading Rack: Prior to 1980

7.4.3 Applicability Provisions and Applicable Regulations

An "affected barge facility," for the purpose of these unit-specific conditions, is a barge loading/unloading facility used to transfer interface product and distillates into a barges. There are no general rules or regulations that address the operation of these emission units located at a petroleum bulk terminal.

Interface product is not considered to be gasoline since the material is nominally generated during the changeover of pipeline petroleum products or other operations which generate a mixture of petroleum products and it is not used as a fuel for internal combustion engines. The phrase is also use to refer to "slop" or off-specification gasoline, the latter not meeting the definition of gasoline in 35 IAC 211 because it cannot be legally consumed in an internal combustion engine.

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected barge loading facility are not subject to 35 IAC Part 218, Subpart GG, because these

emission units are not "permitted to load gasoline or crude oil". [35 IAC 218.760(a)].

- b. The affected barge loading facility are not subject to 35 IAC Part 218, Subpart TT, because these emission units are defined as a "barge loading facilities". [35 IAC 218.980(f)].

7.4.5 Control Requirements and Operational Limitations

None

7.4.6 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.

7.4.7 Operating Requirements

The barge loading facility shall only load interface product and distillates. Interface is a mixture of various gasoline or distillate products. The phrase is also use to refer to "slop" or off-specification gasoline, the latter not meeting the definition of gasoline in 35 IAC 211 because it cannot be legally consumed in an internal combustion engine.

7.4.8 Inspection and Monitoring Requirements

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 each affected barge facility to demonstrate compliance with Condition 7.4.7 pursuant to Section 39.5(7)(b) of the Act:

- a. The loading of any organic liquid into a barge other than interface product and distillates.
- b. The throughputs of each organic liquid through the barge facility during loading operations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission

limits as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Notification within 15 days of loading a material other than interface product or distillates.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected loading rack 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:

None

7.4.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.4.9. Emissions shall be calculated utilizing an approved USEPA methodology, such as Section 5.2 of the AP-42 or the procedure listed below:

For the purpose of demonstrating compliance with the source wide limits in Condition 5.5 and the ERMS emission limits in Condition 6.0, VOM emissions from the barge facility shall be determined by use of the following equation:

$$\text{Total Emissions (lbs.)} = \sum_{i=1} EF_i \times V_i$$

Where

EF_i = The emission factor listed below. For the purpose of estimating barge loading VOM emissions at the source, the emission factors found in Section 5.2 of AP-42, published by USEPA or the best available emission factors, including factors developed by the source, are acceptable.

Product	EF
Interface ^a	3.9 lb/gallon
Distillates	0.013 lb/gallons

a Emission factor for gasoline barge loading in Section 5.2 of AP-42

V_i = Volume of interface product or distillate as recorded in the records required in Condition 7.4.9.

7.5 Unit: Fugitives from Leaking Components
Control: None

7.5.1 Description

Fugitive emissions from equipment components, those not included in the loading rack emissions, such as valves, flanges,...etc., are generated during the processing of material through the piping distributed throughout the source.

7.5.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Equipment components (valves, flanges, pump seals, etc.)	Processing of material throughout the source's piping system	Work practices and equipment replacement

7.5.3 Applicability Provisions

The loading rack is subject to 40 CFR 60 Subpart XX. The "Loading rack" means the loading arms, pumps, meters, shutoff valves, relief valves, and other piping and valves necessary to fill delivery tank trucks. The "Vapor collection system" means any equipment used for containing total organic compounds vapors displaced during the loading of gasoline tank trucks. The "Vapor processing system" means all equipment used for recovering or oxidizing total organic compounds vapors displaced from the source.

Pursuant to 35 IAC 218.142, no person shall cause or allow the discharge of more than 32.8 ml (2 cu in) of VOL with vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3 °K (70°F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions. Note that pursuant to Condition 5.10, the source is shielded from determining compliance with 35 IAC 218.142.

7.5.4 Non-Applicable Regulations

This permit is issued based on the source not being subject to 35 IAC Part 218, Subpart TT, because the potential to emit VOM from subject units does not exceed 25 tpy.

7.5.5 Control Requirements

None

7.5.6 Emission Limitations

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

7.5.7 Operating Requirements

The Permittee shall repair any component from which a leak of VOL is noted in the inspections required in section 7.5.8. The repair shall be completed as soon as practicable but no later than 15 days after the leak is found. If the leaking component cannot be repaired without the process unit being shut down, or is unsafe to repair without a shutdown, the leaking component must then be repaired during the next shutdown before the unit is restarted.

7.5.8 Inspection Requirements

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

7.5.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the piping components at the source to demonstrate compliance with Condition 7.5.4 pursuant to Section 39.5(7)(b) of the Act and 40 CFR 60.505.

- a. A record of each leak inspection (Condition 7.5.8) required under § 60.502(j) shall be kept on file as per the requirements of 40 CFR 60.505(c). Inspection records shall include, as a minimum, the following information:
 - i. Date of Inspection.
 - ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
 - iii. Leak determination method.

- iv. Corrective Action (date each leak repaired; reasons for any repair interval in excess of 15 days).
 - v. Inspector Name and Signature.
 - vi. The owner or operator of an source shall keep records of all replacements or additions of components performed on an existing vapor processing system.
- b. The number of components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or vapor service, as applicable. Estimates based on field surveys are sufficient; an exact component count or inventory is not required.
 - c. Records on component addition and replacement shall be kept as per the requirements of 40 CFR 60.505(f).
 - d. Emissions of VOM attributable to fugitive losses (valves, pump seals, etc.), tons/month and tons/year, with supporting calculations, calculated utilizing the compliance procedures in Condition 7.5.12 or other approved USEPA methodology;

7.5.10 Reporting Requirements

None

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to these units 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:

Changes in types of components and component counts which do not cause a violation of emission limits in Conditions 5.5, 7.2.6, and 7.3.6.

7.5.12 Compliance Procedures

- a. Compliance with the fugitive VOM emission limitations of Condition 7.5 and pursuant to the overall VOM emissions limitation of Condition 5.5 and the ERMS emissions limits in Condition 6, shall be

demonstrated through the calculation of the following equation:

$$\text{Total Fugitive VOM Emissions (lb/hr)} = \sum_{i=1} EF_i \times N_i$$

Where:

EF_i = The specific component's (i.e., valves, pump seals, etc.) emission factor listed below. For the purpose of estimating fugitive VOM emissions from components at the source, the emission factors found in "American Petroleum Institute (API) Marketing Study (ATMY-01) published by USEPA or the best available emission factors, including factors developed by the source, are acceptable.

Component	Light liquid ^a	Heavy Liquid	Vapor ^b
Valves	0.00015	0.00015	0.00016
Pump Seals	0.000930	0.000930	0.000930
Connectors	0.000023	0.000023	0.000023
Relief Valves	0.000250	0.000250	0.001400
Process Drains	0.000250	0.000250	0.000250
Open-Ended Lines	0.006500	0.006500	0.006500
Sample Connections	0.000250	0.000250	0.000250

a Light liquid - not in gas/vapor service or heavy liquid service;

b Vapor - material in a gaseous state at operating conditions; and

c Other means any components other than flanges, valves, open-ended lines, and pump seals.

N_i = Number of specific components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or gas service as recorded in the records required in Condition 7.5.9.

Total annual emissions, in tons/year, shall be calculated by multiplying the hourly emission by 8760 hr/year.

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 23, 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].

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

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

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

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard

test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

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

- i. Illinois EPA - Air Compliance Section

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

Illinois Environmental Protection Agency
Division of Air Pollution Control
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)(p)(ii) of the Act]:

- 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; 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.

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 - Summary of Storage Tank Features and Groupings

TABLE 1-1

<u>Group/Tank #</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Max. Vapor Pressure (psia at 70°F)¹</u>	<u>Date Constructed or Modified</u>
Group 1							
14	63,840	Internal Floating Roof	Vapor Mounted Resilient Seal	---	Various Petroleum Products	6.19	1946
15	175,569	Internal Floating Roof	Vapor Mounted Resilient Seal	---	Various Petroleum Products	6.19	1946
17	328,524	Internal Floating Roof	Vapor Mounted Resilient Seal	---	Various Petroleum Products	6.19	1946
25	744,660	Internal Floating Roof	Vapor Mounted Resilient Seal	---	Various Petroleum Products	6.19	1949
26	739,602	Internal Floating Roof	Vapor Mounted Resilient Seal	---	Various Petroleum Products	6.19	1949

¹ Vapor pressure data is provided for informational purposes only and is not to be construed as a permit limitation

<u>Group/Tank #</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Max. Vapor Pressure (psia at 70°F)¹</u>	<u>Date Constructed or Modified</u>
53	2,132,298	Internal Floating Roof	Vapor Mounted Resilient Seal	---	Various Petroleum Products	6.19	1949
57	2,084,334	Internal Floating Roof	Vapor Mounted Resilient Seal	---	Various Petroleum Products	6.19	1951
58	3,061,508	Internal Floating Roof	Mechanical Shoe	Rim- Mounted	Various Petroleum Products	6.19	1956
59	3,080,091	Internal Floating Roof	Mechanical Shoe	Rim- Mounted	Various Petroleum Products	6.19	1955
Group 2							
7	416,178	Internal Floating Roof	Liquid Mounted Resilient Seal	---	Ethanol	0.87	Prior to 1960
8	404,000	Internal Floating Roof	Liquid Mounted Resilient Seal	---	Ethanol	0.87	Prior to 1960
21	824,000	Internal Floating Roof	Liquid Mounted Resilient Seal	---	Ethanol	6.19	Prior to 1960

¹ Vapor pressure data is provided for informational purposes only and is not to be construed as a permit limitation

10.2 Attachment 2 - 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: _____

MED:psj