



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 19 2007

REPLY TO THE ATTENTION OF

(AE-17J)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Harold Stewart
Illinois Region Manager
Gas Recovery Services of Illinois, Inc.
26 West 570 Schick Road
Hanover Park, Illinois 60133

Dear Mr. Stewart:

This is to advise you that the U.S. Environmental Protection Agency (EPA) has determined that the Gas Recovery Services facility at 26 West 570 Schick Road, in Hanover Park, Illinois (GRS or facility) is in violation of the Clean Air Act (CAA) and its implementing regulations. A list of the requirements violated is provided below. We are today issuing you a Finding of Violation (FOV).

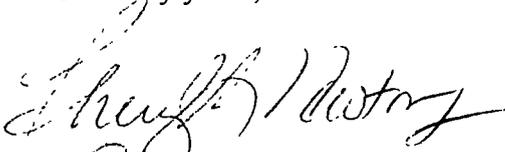
- 1) GRS violated the requirements of 40 C.F.R. Part 82, Subpart F, § 82.156(i), governing, among other things, the repair of leaks from industrial process refrigeration equipment containing greater than 50 pounds of class a I ozone-depleting substance.
- 2) GRS violated the terms of its Title V permit that require GRS to fire only landfill gas in its turbines except during startup, which shall not exceed 20 minutes.

We have several enforcement options under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). We are offering you an opportunity to confer with us about the violations cited in the FOV. The conference will give you the opportunity to present information on the specific findings of violation, the efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Shannon Downey. You may call her at (312) 353-2151 if you wish to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely yours,



Stephen Rothblatt, Director
Air and Radiation Division

Enclosure

cc: Ray Pilapil, Manager
Compliance and Enforcement Section Bureau of Air

**United States Environmental Protection Agency
Region 5**

IN THE MATTER OF:)
)
Gas Recovery Services of Illinois, Inc.) **FINDING OF VIOLATION**
Hanover Park, Illinois)
) EPA-5-08-04-IL
Proceedings Pursuant to)
the Clean Air Act,)
42 U.S.C. §§ 7401 et seq.)
)

FINDING OF VIOLATION

Gas Recovery Services of Illinois, Inc. (you or GRS) owns and operates a landfill gas to energy facility at 26 West 570 Schick Road, in Hanover Park, Illinois (facility).

The U.S. Environmental Protection Agency (EPA) is sending this Finding of Violation (FOV-or notice) to you for violating the Clean Air Act (the Act or CAA) and its implementing regulations. An explanation of the violations is provided below.

Section 113 of the Act provides you with the opportunity to request a conference with us to discuss the violations alleged in this FOV. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply, and the steps you will take to prevent future violations. Please plan for the facility's technical and management personnel to take part in these discussions. You may have an attorney represent you at this conference.

I. Explanation of Violations

A. Violations of 40 C.F.R. Part 82, "Protection of Stratospheric Ozone," Subpart F:

1. 40 C.F.R. Part 82, Subpart F, § 82.156(i), applies to, among other things, owner and operators of industrial process refrigeration equipment containing greater than 50 pounds of class I ozone-depleting substance.
2. GRS owns or operates the 08800 chiller, industrial process refrigeration equipment containing greater than 50 pounds of R-22, a class I ozone-depleting substance.

3. On August 3, 2006, the 08800 chiller had an annualized leak rate of refrigerant greater than 35 percent.
4. GRS violated 40 C.F.R. § 82.156(i)(2), and (i)(9) by failing to repair the leak with 30 days such that the annualized leak rate was brought below 35 percent.
5. GRS violated 40 C.F.R. § 82.156(i)(3) by failing to perform an initial verification test at the conclusion of the repairs.
6. GRS violated 40 C.F.R. § 82.156(i)(3) by failing to conduct a follow-up verification test within 30 days after the initial verification test.
7. GRS violated 40 C.F.R. § 82.156(i)(3)(iii) by failing to notify the EPA within 30 days of the failed follow-up verification test.
8. GRS violated 40 C.F.R. § 82.156(i)(3)(ii) and (i)(6) by failing to develop a one-year retrofit and retirement plan for 08800 chiller following the failure to bring the leak rate to below 35 percent.
9. GRS violated 40 C.F.R. § 82.156(i)(3)(ii) and (i)(6) by failing to retrofit or retire the 08800 chiller within one year of the failure to bring the leak rate to below 35 percent.

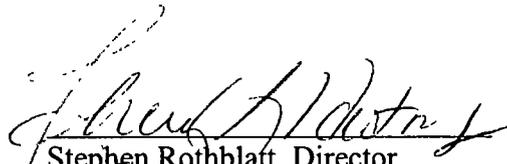
B. Violations of Title V permit:

1. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V permit.
2. U.S. EPA granted full approval to the Illinois' Title V operating permit program on December 4, 2001 (66 Fed. Reg. 62946).
3. The Illinois Environmental Protection Agency issued GRS a Title V permit on September 17, 2003.
4. Conditions 7.1.3.b. and d. of its Title V permit require GRS to fire only landfill gas in its turbines except during startup, which shall not exceed 20 minutes.
5. During the dates and time specified in the attached Appendix A, GRS violated conditions 7.1.3.b. and d. of its Title V by firing distillate fuel oil #2 in the turbines either: (1) during times other than startup, or (2) during times that exceeded 20 minutes allowed for startup.

II. Environmental Impact of Violations

1. Violations of the standards for the Protection of Stratospheric Ozone cause to an increase in the depletion of stratospheric ozone ("the ozone layer"). The ozone layer protects humans as well as many plants and animals by filtering harmful ultraviolet radiation from the sun.
2. The CAA requires the development of Primary and Secondary National Ambient Air Quality Standards (NAAQS) to protect public health and welfare. To attain and maintain these standards, each State is required to develop an implementation plan to adequately control sources of air pollutants. Failure to comply with the limitation on firing fuel oil impedes the State's ability to attain and maintain the NAAQS.

12/19/57
Date


Stephen Rothblatt, Director
Air and Radiation Division

Date	Unit	Diesel fuel operation start time	Diesel fuel operation stop time	Total Operating time on Diesel Fuel	Reason for diesel fuel operation
6/3/2002	3	12 53	12 58	5 Minutes	Gas Compressor 1 trip Turbine shift to liquid/Restarted Gas Compressor 1 Shift turbine to Gas
6/4/2002	3	12 45	12 50	5 Minutes	GC 3 Trip/Turbine shift to liquid/started GC 1 shift turbine to liquid
6/4/2002	1	17.10	18 55	1 45	Start up/Problems starting GC 2/GC 2 started Turbine shifted to Gas
6/10/2002	1	22 48	23 24	36 Minutes	Start up/Unable to startup GC in timely manner due to added task obligations
6/10/2002	1	23 57	6/11/2002 0:54	57 Minutes	Start up/experienced trouble starting second turbine/gas pressure issues with 1 on 1 operation
6/11/2002	1	17 00	17 30	30 Minutes	GC 2 Trip/shift turbine to liquid/started GC 1 shifted turbine to Gas
6/11/2002	1	17 55	22 01	4 05	Start up/unable to get second turbine started/shut turbine down to perform troubleshooting
6/12/2002	2	2 34	3 08	42 Minutes	Start up/waiting start of second turbine due to high gas pressure issues with 1 on 1 operation
6/23/2002	1	5 30	7 03	1 33	Start up/waiting start of second turbine due to high gas pressure issues with 1 on 1 operation
6/23/2002	3	5 55	7 03	1 08	Start up/unable to get a GC started/troubleshooting/shutdown turbines 1 and 3
6/23/2002	2	10 35	10 56	21 Minutes	Start up/GC started shift 1 turbine to gas/wait for gas pressure to build up before shifting turbine 2
7/9/2002	1	3:52	4:13	21 Minutes	Start up/waiting start of second turbine due to high gas pressure issues with 1 on 1 operation
7/13/2002	3	23.37	23 50	13 Minutes	GC 3 shutdown/shift turbine to liquid/restarted GC 3 shifted turbine to Gas
7/14/2006	3	0 15	1 10	55 Minutes	GC 3 shutdown/shift turbine to liquid/made repairs to GC/restarted GC 3 shifted turbine to Gas
7/16/2002	1	16 46	16 49	3 Minutes	GC 3 trip/start GC 2 shift turbine to Gas
7/16/2002	3	16 46	16:49	3 Minutes	GC 3 trip/start GC 2 shift turbine to Gas
7/17/2002	1	0 48	1 23	35 Minutes	3 trip/shift turbine to liquid/stopped turbine to repair fuel leak
8/3/2002	3	12 59	13 56	57 Minutes	GC 3 shutdown shift turbine to liquid/problems starting a GC/GC 3 started shift turbine to GAS

8/5/2002	1	19.23	20 01	38 Minutes	Start up/turbine would not synch to the grid troubleshooting/shutdown turbine
8/5/2002	1	20:27	21.00	33 Minutes	Start up/troubleshooting voltage control/shift turbine to gas manual voltage control
8/6/2002	1	10:43	11 26	43 Minutes	Start up/new voltage regulator adjustment/shifted to Gas
8/13/2002	1	21 20	22:45	1 25	Start up/turbine trip high vibs waiting second turbine startup
8/14/2002	3	3:00	3 45	45 Minutes	GC 2 trip shift turbine to liquid/adjusting troubleshooting GC 2/Shutdown turbine
8/14/2002	1	18 35	19 00	25 Minutes	Start up/waiting start of second turbine due to high gas pressure issues with 1 on 1 operation
8/20/2002	1	9:00	9 01	1 Minute	GC 3 trip shift turbine to liquid/Restart GC 3 shift turbine to Gas
8/30/2002	1	15:57	15 57	0	GC 2 and 3 shutdown turbine shift to liquid/GC 3 restarted shift turbine to Gas

Date	Unit	Diesel fuel operation start time	Diesel fuel operation stop time	Total Operating time on Diesel Fuel	Reason for diesel fuel operation
8/30/2002	2	17 06	17 03	2 Minutes	turbine shifted to liquid for cool down/Shutdown turbine
8/31/2002	1	4 52	4 56	4 Minutes	turbine shifted to liquid for cool down/Shutdown turbine
9/2/2002	3	9:49	9:56	7 Minutes	turbine shifted to liquid for cool down/Shutdown turbine
9/2/2002	3	19 20	19 42	22 Minutes	GC 3 trip shift turbine to liquid/Restart GC 3 shift turbine to Gas
9/3/2002	1	13 39	14 05	26 Minutes	Start up/GC 3 tripped during startup process/Restarted GC 3 shifted turbine to Gas
9/3/2002	3	13 43	14 05	22 Minutes	Start up/GC 3 tripped during startup process/Restarted GC 3 shifted turbine to Gas
9/6/2002	1	23:30	23 55	25 Minutes	Start up/waiting start of second turbine due to high gas pressure issues with 1 on 1 operation
9/12/2002	2	3 50	4 00	10 Minutes	GC 3 trip shift turbine to liquid/Restart GC 3 shift turbine to Gas
9/12/2002	2	9 57	10:12	15 Minutes	GC 3 trip/ turbine trip shifting to liquid/restart turbine shift to gas
9/29/2002	1	23 21	23:23	2 Minutes	shift turbine to liquid for cooldown/Shutdown turbine
9/29/2002	2	23 21	23 23	2 Minutes	shift turbine to liquid for cooldown/Shutdown turbine
10/6/2002	1	18:05	20:05	2.00	Start up/waiting start of second turbine due to high gas pressure issues with 1 on 1 operation
10/9/2002	2	14 48	15:35	47 Minutes	Start up/steam plant trip operators involved with securing steam turbine/shifted turbine to Gas
10/13/2002	1	23 58	10/14/2002 0 26	28 Minutes	Start up/waiting start of second turbine due to high gas pressure issues with 1 on 1 operation
10/29/2002	1	10 25	10:31	6 Minutes	shift turbine to liquid for cooldown/Shutdown turbine
10/30/2002	2	8 58	9 06	8 Minutes	shift turbine to liquid for cooldown/Shutdown turbine
10/31/2002	3	9 04	9 14	10 Minutes	shift turbine to liquid for cooldown/Shutdown turbine
11/19/2002	2	9 10	9 32	22 Minutes	Start up/waiting start of second turbine due to high gas pressure issues with 1 on 1 operation
11/28/2002	3	7 50	7 57	7 Minutes	shift turbine to liquid for cooldown/Shutdown turbine
12/30/2002	2	14:39	15:00	21 Minutes	Start up
1/9/2003	3	2 18	2:19	1 Minute	GC Shutdown/switch to liquid/trip
1/18/2003	3	4 20	4:48	28 Minutes	GC Shutdown/switch to liquid/stop
1/18/2003	1	17 13	21:54	4 41	Start up/trip
1/18/2003	1	22 20	23:15	55 Minutes	GC Shutdown/switch to liquid
1/18/2003	1	23 19	23 23	4 Minutes	GC Shutdown/switch to liquid
1/21/2003	3	2:00	2:00	0	GC Shutdown/switch to liquid/trip
1/21/2003	3	2:15	4 00	1:45	Start up
1/21/2003	3	19 07	21 03	1 56	GC Shutdown/switch to liquid
1/27/2003	3	0:00	0 10	10 Minutes	GC Shutdown/switch to liquid
2/3/2003	2	13:30	15:45	2 15	Start up
2/3/2003	3	15:46	15:50	4 Minutes	GC Shutdown/shift to liquid
2/19/2003	1	9:24	9:24	0	Shift to liquid - trip
2/21/2003	3	17 44	18:05	21 Minutes	Start up/switch to gas/shutdown
2/25/2003	2	3 30	3 35	5 Minutes	GC Shutdown/switch to liquid
3/12/2003	3	1:45	1 45	0	GC Shutdown - fail to shift to liquid
3/17/2003	1	4:37	4 40	3 Minutes	Switch to liquid - stop
3/17/2003	2	4 39	4 42	3 Minutes	Shift to liquid - stop
3/17/2003	3	4:39	4 53	14 Minutes	Shift to liquid - stop
3/17/2003	1	17:28	17:59	31 Minutes	Start up
3/18/2003	1	17 25	17 27	2 Minutes	GC Shutdown - switch to liquid
3/25/2003	1	14 20	14 20	0	gc Shutdown - switch to liquid - trip
4/8/2003	2	8 52	9 02	10 Minutes	Switch to liquid - shutdown
4/10/2003	1	10 03	10 20	17 Minutes	Shift to liquid - shutdown
4/11/2003	1	9 37	9 46	9 Minutes	GC Stop - shift to liquid

Date	Unit	Diesel fuel operation start time	Diesel fuel operation stop time	Total Operating time on Diesel Fuel	Reason for diesel fuel operation
4/14/2003	1	10 00	10 00	0	Fail to shift to liquid - stop
4/23/2003	3	6 04	6 04	0	Shift to liquid - trip
4/23/2003	2	6 11	6 17	6 Minutes	Shift to liquid - shutdown
4/23/2004	1	6 19	6 23	4 Minutes	Shift to liquid - shutdown
4/24/2003	1	18:15	18 57	42 Minutes	Start up
4/23/2003	2	18 25	18 57	32 Minutes	Start up
4/25/2003	3	11:10	11 39	29 Minutes	Start up
4-May	3	13:58	14 42	44 Minutes	Start up
5/19/2003	3	8:02	8 02	0	Shift to liquid - shutdown
5/20/2003	2	7:44	7 52	8 Minutes	Shift to liquid - shutdown
5/20/2003	2	10:00	10 21	21 Minutes	Start up
5/21/2003	1	8:47	8 53	6 Minutes	Shift to liquid - shutdown
5/21/2003	2	21 01	21 10	9 Minutes	GC shutdown -shift to liquid
6/5/2003	3	20:35	20 45	10 Minutes	Shutdown - flame fail
6/9/2003	1	8:32	8 38	6 Minutes	Stop
6/10/2003	2	8:15	8 28	13 Minutes	Stopped
6/26/2003	1	7 55	8 03	8 Minutes	Stopped
6/30/2003	2	8 14	8 18	4 Minutes	Stopped
7/7/2003	3	10 22	10 22	0	Shift to liquid - shutdown
7/9/2003	1	8 11	8 11	0	GC fail -shift to liquid - shutdown
7/9/2003	3	8 11	8 11	0	GC fail -shift to liquid - shutdown
7/9/2003	2	8:11	8 34	23 Minutes	GC fail -shift to liquid
7/15/2003	1	16.02	16 06	4 Minutes	GC fail - shift to liquid
7/17/2003	2	20.40	21 05	25 Minutes	Start up
7/18/2003	3	8:56	9 01	5 Minutes	Shift to liquid - stop
7/21/2003	3	3 09	3 37	28 Minutes	Start up
8/6/2003	3	8:16	8 22	6 Minutes	Shift to liquid - stop
8/7/2003	2	8:26	8:32	6 Minutes	Shift to liquid - stop
8/8/2003	1	10 35	10 40	5 Minutes	Shift to liquid - stop
8/25/2003	3	6 18	16 24	6 Minutes	Shift to liquid - stop
8/25/2003	2	8 58	9 02	4 Minutes	Shift to liquid - stop
8/25/2003	1	11:40	11 42	2 Minutes	Shift to liquid - stop
8/27/2003	1	11 00	11 05	5 Minutes	Shift to liquid - stop
8/27/2003	2	14 24	14 29	5 Minutes	Shift to liquid - stop
8/27/2003	3	17 00	17 00	0	Shift to liquid - trip
9/27/2003	2	16:57	16 57	0	GC fail-shift to liquid-right back to gas
10/3/2003	1	16.05	16.30	25 Minutes	GC fail-shift to liquid- shutdown
10/3/2003	2	16:05	16 30	25 Minutes	GC fail -shift to liquid - shutdown
10/3/2003	1	19 20	19:45	25 Minutes	Start up - no switch to gas - shutdown
10/3/2003	2	19:20	19 45	25 Minutes	Start up - no switch to gas - shutdown
10/13/2003	2	0 23	0 26	3 Minutes	Switch to liquid - stop
10/13/2003	1	0 23	0 26	3 Minutes	Switch to liquid - stop
10/13/2003	3	0 11	0 26	15 Minutes	Switch to liquid - stop
10/18/2003	1	22 35	23 00	25 Minutes	Start up
11/15/2003	1	15.30	16 00	30 Minutes	GC Fail - shift to liquid
11/15/2003	2	15:30	16.00	30 Minutes	GC Fail - shift to liquid
12/8/2003	1	18:34	18 45	11 Minutes	GC Fail - shift to liquid
12/8/2003	2	18:34	18 45	11 Minutes	GC Fail - shift to liquid
12/16/2003	1	6.50	6:57	7 Minutes	GC Fail - shift to liquid
12/16/2003	2	6:50	6:57	7 Minutes	GC Fail - shift to liquid
12/17/2003	2	7:55	7:59	4 Minutes	Shift to liquid - stop
12/18/2003	3	13.12	13.19	6 Minutes	GC Fail - shift to liquid - then back to gas
12/18/2003	1	10 59	11:05	6 Minutes	GC Fail - shift to liquid - then back to gas
12/29/2003	2	15 52	16:30	42 Minutes	GC Fail - switch to liquid
12/29/2003	3	18 35	19:15	35 Minutes	Start up
1/2/2004	3	19:00	19:10	10 Minutes	GC Trip
1/2/2004	1	15:55	15 55	0 Minutes	GC Fault
1/8/2004	1	8:25	9 09	44 Minutes	GC Trip
1/10/2004	1	22 00	22 00	0 Minutes	GC Trip
1/12/2004	1	14 21	14 28	7 Minutes	GC Trip
1/18/2004	1	5 22	5 31	9 Minutes	Shutdown

Date	Unit	Diesel fuel operation start time	Diesel fuel operation stop time	Total Operating time on Diesel Fuel	Reason for diesel fuel operation
1/16/2004	2	5:22	5:31	9 Minutes	Shutdown
1/16/2004	1	20:04	21:14	70 Minutes	Start up
1/16/2004	3	23:04	23:25	21 Minutes	Start up
3/23/2004	3	13:04	13:35	31 Minutes	Start up/shutdown
4/16/2004	2	12:56	13:15	19 Minutes	GC Shutdown
4/16/2004	3	13:37	16:41	64 Minutes	Start up
4/16/2004	3	19:00	19:30	30 Minutes	Start up
4/16/2004	1	19:00	19:30	30 Minutes	Start up
4/17/2004	1	11:01	12:41	100 Minutes	Start up
4/17/2004	1	13:39	14:00	21 Minutes	Start up
4/17/2004	1	18:45	19:01	16 Minutes	GC Trip
4/17/2004	2	18:45	18:59	14 Minutes	GC Trip
4/17/2004	1	23:38	23:55	17 Minutes	GC Trip/start up
4/17/2004	2	23:43	23:55	12 Minutes	GC Trip/start up
5/11/2004	3	17:37	18:27	50 Minutes	Start up
5/22/2004	2	23:55	0:14	19 Minutes	GC Shutdown
5/25/2004	3	20:45	21:00	15 Minutes	Shutdown
5/25/2004	3	23:04	23:30	26 Minutes	Start up
5/27/2004	2	10:47	12:19	92 Minutes	GC Shutdown
5/27/2004	3	10:47	12:19	92 Minutes	GC Shutdown
6/12/2004	1	2:24	3:15	51 Minutes	Start up
6/12/2004	2	2:45	3:15	30 Minutes	Start up
7/8/2004	2	14:04	14:06	2 Minutes	GC Trip
7/9/2004	1	17:05	18:00	55 Minutes	Start up
7/9/2004	2	17:19	18:00	41 Minutes	Start up
7/14/2004	1	2:03	2:06	3 Minutes	GC Shutdown
7/14/2004	2	2:03	2:06	3 Minutes	GC Shutdown
8/9/2004	2	9:19	19:45	26 Minutes	Start up
9/7/2004	2	11:35	12:45	70 Minutes	Start up/ GC Shutdown
9/7/2004	3	12:35	12:45	10 Minutes	Start up/ GC Shutdown
9/7/2004	3	12:50	13:20	30 Minutes	Start up
9/7/2004	2	12:50	13:20	30 Minutes	Start up
9/13/2004	1	10:45	10:45	0 Minutes	GC Shutdown
9/26/2004	1	11:50	12:20	30 Minutes	Start up
9/27/2004	1	13:20	13:31	11 Minutes	GC Shutdown
9/27/2004	2	13:20	13:31	11 Minutes	GC Shutdown
9/28/2004	1	10:59	11:03	4 Minutes	GC Shutdown
9/28/2004	2	10:59	11:03	4 Minutes	GC Shutdown
10/18/2004	1	4:20	4:26	6 Minutes	Shutdown
10/18/2004	2	4:20	4:26	6 Minutes	Shutdown
10/18/2004	3	19:01	20:00	59 Minutes	Start up
10/18/2004	1	19:34	20:00	26 Minutes	Start up
10/19/2004	1	15:38	16:00	22 Minutes	Start up
10/20/2004	2	8:05	8:10	5 Minutes	Shutdown
10/21/2004	1	8:05	8:15	10 Minutes	Shutdown
10/21/2004	2	8:05	8:15	10 Minutes	Shutdown
10/21/2004	3	8:05	8:15	10 Minutes	Shutdown

Date	Unit	Diesel fuel operation start time	Diesel fuel operation stop time	Total Operating time on Diesel Fuel	Reason for diesel fuel operation
12/1/2004	2	9.22	9:50	28 Minutes	Start up
12/1/2004	1	15:00	16 11	71 Minutes	Start up
12/1/2004	3	16.40	20 05	205 Minutes	Start up/troubleshoot
12/1/2004	3	20 53	22 18	85 Minutes	Start up/troubleshoot
12/2/2004	3	13 50	15 55	185 Minutes	Start up
12/5/2004	1	12:42	13.06	24 Minutes	Start up
12/5/2004	2	12.43	13 06	23 Minutes	Start up
12/8/2004	2	3.55	4 00	5 Minutes	Shutdown
12/8/2004	3	4 25	4 46	21 Minutes	GC Shutdown
12/8/2004	1	12:45	12:55	10 Minutes	Shutdown
12/9/2004	3	3.55	4:00	5 Minutes	Shutdown
12/19/2004	1	16 00	17 06	66 Minutes	GC Shutdown
12/19/2004	2	16 00	17.06	66 Minutes	GC Shutdown
12/19/2004	3	16:00	17 11	71 Minutes	GC Shutdown
12/19/2004	1	20.00	21 17	77 Minutes	GC Shutdown
12/19/2004	3	21 25	21 42	17 Minutes	GC Shutdown
12/21/2004	3	13 28	13 53	25 Minutes	Start up
12/28/2004	1	21:48	21.55	7 Minutes	GC Trip
12/28/2004	2	21:48	21 55	7 Minutes	GC Trip
12/29/2004	1	6 45	6 48	3 Minutes	Shutdown
12/29/2004	2	6:45	6 48	3 Minutes	Shutdown
12/29/2004	2	19.17	20:06	49 Minutes	Start up
12/30/040	1	10.38	11 07	29 Minutes	Shutdown
1/14/2005	3	12:55	13 39	34 Minutes	Start up
2/8/2005	2	13.20	14 00	40 Minutes	Start up
3/27/2005	3	0 36	100	25 Minutes	Start up
2/27/2005	2	1.08	1 42	34 Minutes	Start up
2/26/2004	1	23 49	1 42	113 Minutes	Start up
2/27/2005	3	10.59	12.34	95 Minutes	Start up
2/28/2000	3	15:27	17:08	101 Minutes	Start up
3/3/2005	3	9:59	9 59	0 Minutes	GC Stopped
3/3/2005	1	10:01	10 19	18 Minutes	GC Stopped
3/3/2005	2	10 01	10:33	32 Minutes	GC Stopped
3/4/2005	1	9:50	10:40	50 Minutes	GC Failure
3/10/2005	2	5.40	5.43	3 Minutes	Shutdown
3/15/2005	1	7:45	8:00	15 Minutes	GC Failure
3/15/2005	3	7 45	8 00	15 Minutes	GC Failure
3/15/2005	2	9 04	9 30	26 Minutes	Start up
3/27/2005	1	13 35	13.46	11 Minutes	GC Shutdown
3/28/2005	2	13:44	13:44	0 Minutes	GC Failure
3/28/2005	1	13:25	13:42	16 Minutes	GC Failure
3/28/2005	3	13:25	13 42	16 Minutes	GC Failure
3/29/2005	3	5 37	5.44	6 Minutes	Shutdown
3/29/2005	2	9 40	9 42	2 Minutes	Shutdown
3/30/2005	3	10.21	10 42	21 Minutes	Start up
3/30/2005	1	16 44	16 45	1 Minute	GC Failure
5/8/2005	3	3 38	13:38	0 Minutes	GC Failure - shutdown on shift to liquid
5/23/2005	2	11:40	11 45	5 Minutes	Shutdown
5/23/2005	3	12.58	13 02	4 Minutes	Shutdown
5/24/2005	2	8.20	8 23	3 Minutes	Shutdown
5/31/2005	1	21 23	21 25	2 Minutes	GC Failure
5/31/2005	1	22 43	22:47	4 Minutes	Shutdown

Date	Unit	Diesel fuel operation start time	Diesel fuel operation stop time	Total Operating time on Diesel Fuel	Reason for diesel fuel operation
6/4/2005	1	15 32	16 37	65 Minutes	Start up
6/9/2005	1	22 34	22.50	16 Minutes	GC Failure
6/13/2005	1	1:25	1.26	1 Minute	GC Failure
7/13/2005	2	19 15	20 00	45 Minutes	Start up - shutdown
7/14/2005	3	12.47	13:30	43 Minutes	Start up
7/14/2005	2	14:31	14 34	3 Minutes	GC Failure
7/14/2005	3	14 31	14 34	3 Minutes	GC Failure
7/15/2005	1	20.12	20:43	31 Minutes	Start up
7/19/2005	1	2 17	3 13	56 Minutes	Shutdown - GC Failure
8/1/2005	1	0 15	0 20	5 Minutes	GC Failure
8/1/2005	1	0 58	1 10	12 Minutes	GC Stop
8/5/2005	1	6 59	7.05	6 Minutes	Shutdown
8/5/2005	2	6 59	7 05	6 Minutes	Shutdown
8/5/2005	1	19.10	19:32	22 Minutes	Start up
8/9/2005	2	10 06	10 07	1 Minute	GC Failure
8/15/2005	3	7 01	7:04	3 Minutes	Shutdown
8/15/2005	1	7 06	7 11	5 Minutes	Shutdown
8/15/2005	2	7.06	7 11	5 Minutes	Shutdown
8/23/2005	1	16 41	17.18	37 Minutes	Start up
8/23/2005	2	16 47	19 17	30 Minutes	Start up
9/12/2005	3	11:25	11.26	1 Minute	GC Failure
9/22/2005	2	3:45	4 46	61 Minutes	Start up
9/25/2005	2	8:17	8 23	6 Minutes	Shutdown
9/25/2005	2	10 38	10 59	21 Minutes	Start up
10/25/2005	2	15 01	15 35	34 Minutes	Start up
10/25/2005	3	15:07	17 28	141 Minutes	Start up
10/28/2005	2	18.42	19 48	66 Minutes	Start up
11/7/2005	1	13.38	13 46	8 Minutes	GC Failure
11/7/2005	1	15:27	15 32	5 Minutes	GC Failure - Flame out
11/13/2005	1	4 29	4 52	23 Minutes	Start up
11/13/2005	1	14:35	14 58	23 Minutes	Start up
11/13/2005	2	14 35	14:48	23 Minutes	Start up
11/13/2005	2	14:35	14 58	23 Minutes	Start up
11/13/2005	3	16:53	17:14	21 Minutes	GC Failure
11/13/2005	3	18 49	19 16	27 Minutes	Start up
11/18/2005	2	13 09	13.19	10 Minutes	GC Failure
11/18/2005	1	17:22	17:26	4 Minutes	GC Failure
11/28/2005	3	16.27	17 17	50 Minutes	Start up
11/28/2005	2	16 50	17:17	27 Minutes	Start up
12/21/2005	2	14:22	15.04	42 Minutes	Start up
12/21/2005	1	14.24	15.04	40 Minutes	Start up
12/23/2005	2	10:57	11.19	22 Minutes	Start up
1/13/2006	1	8 34	8 37	3min	gc shut down
1/25/2006	3	22:16	22 19	3min	gc shut down
2/1/2006	2	13 28	14 14	46min	start up/water wash
3/7/2006	2	9.17	9 26	9min	shut down
3/7/2006	2	13.57	13:58	1min	shut down
3/13/2006	1	0:54	1 40	46min	start up/shut down
3/13/2006	3	2 18	2:46	28min	start up

Date	Unit	Diesel fuel operation start time	Diesel fuel operation stop time	Total Operating time on Diesel Fuel	Reason for diesel fuel operation
3/13/2006	1	2 25	2 45	21min	start up
4/12/2006	1	15 35	16 05	30min	start up/shut down
4/14/2006	3	13:14	13 17	3min	shut down/maintenance
4/14/2006	2	15:06	15 11	5min	shut down
4/14/2006	2	16 55	17 08	13min	shut down
4/14/2006	2	17 17	17 22	5min	shut down
4/14/2006	1	19 17	19.22	5min	shut down
4/18/2006	1	10:35	10.36	1min	gc trip
4/21/2006	2	9:50	9.52	2min	shift gc
4/23/2006	1	7 44	9 35	111min	start up
4/23/2006	2	7 50	8.15	25min	start up/trip
4/23/2006	1	9:38	10 36	58min	start up
5/22/2006	3	1.11	1 35	24 min	start up
5/22/2006	1	1 16	1.36	20min	start up
5/22/2006	2	4 56	5 28	32min	start up/op test
5/22/2006	2	7:35	8:09	34min	start up
5/24/2006	2	10 21	10 28	7min	shut down
5/27/2006	2	19.03	19 05	2min	gc trip
6/1/2006	2	12 10	12:17	7min	shut down
6/1/2006	2	17 18	17 21	3min	gc shut down
6/10/2006	3	13 02	13 34	32min	start up/plant trip
6/17/2006	1	20 14	20 29	15min	gc trip
6/17/2006	2	20.14	20 17	3min	gc trip
6/19/2006	1	21:58	22 07	9min	gc trip
6/20/2006	1	9 16	9:18	2min	gc trip
6/20/2006	2	9 16	9 23	7min	gc trip
6/20/2006	2	10:41	10:43	2min	gc trip
6/23/2006	3	7 53	8 17	24min	start up
8/6/2006	1	16 12	16 39	27min	start up/plant trip
8/6/2006	1	16:56	17 31	35min	start up
9/19/2006	3	10 49	11 18	29min	start up/fail to sync
9/19/2006	3	14 46	15:21	35min	start up/fail to sync
9/19/2006	3	15.43	16:13	30min	start up/fail to sync
9/27/2006	2	9 17	9 23	6min	gc shutdown
9/27/2006	3	9.17	9 23	6min	shutdown
9/27/2006	3	9 50	10.15	25min	start up
10/3/2006	2	1 01	2 57	116min	start up
10/3/2006	3	1:09	1 52	43min	plant trip/start up/fail to sync
10/6/2006	2	14 02	14 02	0min	gc trip
10/7/2006	3	20 23	20 33	10min	gc start up
10/9/2006	2	9.35	9:43	8min	gc trip
10/12/2006	2	19 37	19:39	2min	gc trip
10/16/2006	2	6:41	6 43	2min	gc trip
10/18/2006	3	19.06	19:16	10min	shut down
10/18/2006	3	19 39	20.04	25min	start up
10/19/2006	2	0 19	0:22	3min	gc trip
10/26/2006	2	0 25	0 39	14min	gc trip
11/5/2006	3	12 03	12.40	37min	start up/plant trip
11/5/2006	2	12:10	12 42	32min	start up/plant trip
11/7/2006	1	9.24	9 55	31min	start up/bearing test
11/9/2006	2	14:48	15.29	41min	start up/plant trip
11/18/2006	2	5:13	5:15	2min	gc trip
11/29/2006	2	8:55	8.58	3min	gc shut down
12/13/2006	2	15:10	16 15	65min	start up
12/21/2006	2	12:31	12 42	11min	gc trip
1/3/2007	2	17 48	17.53	5min	gc stopped
1/4/2007	2	9 48	9 53	5min	gc trip
1/7/2007	2	11 56	12:05	9min	gc trip
1/7/2007	2	12:07	12 23	16min	gc trip
1/17/2007	2	18:42	19.14	32min	start up
1/18/2007	2	6 19	6 21	2min	shut down
1/18/2007	2	18 21	18:45	24min	start up
1/22/2007	3	17 26	17.54	28min	start up

Date	Unit	Diesel fuel operation start time	Diesel fuel operation stop time	Total Operating time on Diesel Fuel	Reason for diesel fuel operation
1/28/2007	2	5 08	5:09	1min	shut down
2/6/2007	2	12 04	12:09	5min	gc trip
2/8/2007	2	1 46	1 50	4min	gc trip
2/8/2007	2	8 13	8 40	27min	start up/shut down
2/8/2007	2	9 42	10 19	37min	start up/shut down
2/8/2007	2	13 07	13 42	35min	start up/shut down
2/23/2007	1	8.03	8:05	2min	gc shut down
2/23/2007	2	8 03	8 05	2min	gc shut down
2/23/2007	3	8 03	8 07	4min	gc shut down
2/27/2007	2	19 34	19 55	21min	start up/vib test
2/28/2007	1	10:59	11:28	29min	start up/vib test
3/1/2007	1	0:56	0:58	2 Minutes	GC Trip
3/1/2007	2	0 56	0 58	2 Minutes	GC Trip
4/5/2007	1	6 45	6:50	5 Minutes	Shutdown
4/5/2007	3	6 50	6:52	2 Minutes	Shutdown
4/6/2007	2	15 38	16 12	34 Minutes	Start up
4/7/2007	2	23.48	13 50	2 Minutes	GC Trip
4/9/2007	1	10:35	10 45	10 Minutes	GC Trip
4/9/2007	2	10 40	10.42	2 Minutes	GC Trip
4/11/2007	2	9:41	19 42	1 Minute	GC Trip
4/24/2007	3	8 45	8 54	9 Minutes	Shutdown
4/26/2007	2	6 47	6 57	10 Minutes	Shutdown
5/22/2007	2	13 36	13 40	4 Minutes	GC Trip
5/22/2007	3	13 36	13 40	4 Minutes	GC Trip
6/9/2007	3	10 46	10 49	3 Minutes	GC Trip
6/23/2007	3	10 41	11 04	23 Minutes	Start up
6/25/2007	1	11 34	11 40	6 Minutes	Shutdown

CERTIFICATE OF MAILING

I, Betty Williams, do hereby certify that a Finding of Violation (EPA-5-08-04-IL) of the Clean Air Act was sent by Certified Mail, Return Receipt Requested, to:

Mr. Harold Stewart
Illinois Region Manager
Gas Recovery Services of Illinois, Inc.
26 West 570 Schick Road
Hanover Park, Illinois 60133

I also certify that I sent copies of the Finding of Violation (EPA-5-08-04-IL) by first class mail to:

Ray Pilapil, Manager
Compliance and Enforcement Section Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

on the 20th day of December, 2007.


Betty Williams, Secretary
AECAS (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 70010320000589201996