

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

THE PREMCOR REFINING)	
GROUP INC.,)	
)	
Petitioner,)	
)	
v.)	PCB 2007-030
)	(CAAPP Permit Appeal)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

NOTICE OF FILING

TO: Ms. Dorothy M. Gunn	Carol Webb, Esq.
Clerk of the Board	Hearing Officer
Illinois Pollution Control Board	Illinois Pollution Control Board
100 West Randolph Street	1021 North Grand Avenue East
Suite 11-500	Post Office Box 19274
Chicago, Illinois 60601	Springfield, Illinois 62794-9274
(VIA ELECTRONIC MAIL)	(VIA FIRST CLASS MAIL)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board a **MOTION FOR LEAVE TO FILE AMENDED PETITION FOR REVIEW** and **AMENDED PETITION FOR REVIEW**, copies of which are herewith served upon you.

Respectfully submitted,

THE PREMCOR REFINING GROUP INC.,
Petitioner,

Dated: December 22, 2006

By: /s/ Katherine D. Hodge
One of Its Attorneys

Katherine D. Hodge
Monica T. Rios
HODGE DWYER ZEMAN
3150 Roland Avenue
Post Office Box 5776
Springfield, Illinois 62705-5776
(217) 523-4900

CERTIFICATE OF SERVICE

I, Katherine D. Hodge, the undersigned, certify that I have served the attached
MOTION FOR LEAVE TO FILE AMENDED PETITION FOR REVIEW and
AMENDED PETITION FOR REVIEW upon:

Ms. Dorothy M. Gunn
Clerk of the Board
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

via electronic mail on December 22, 2006; and upon:

Carol Webb, Esq.
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
Post Office Box 19274
Springfield, Illinois 62794-9274

Robb H. Layman, Esq.
Assistant Counsel
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

by depositing said documents in the United States Mail in Springfield, Illinois, postage
prepaid, on December 22, 2006.

/s/ Katherine D. Hodge
Katherine D. Hodge

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

THE PREMCOR REFINING)	
GROUP INC.,)	
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v.)	PCB 2007-030
)	(CAAPP Permit Appeal)
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PROTECTION AGENCY,)	
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Respondent.)	

**MOTION FOR LEAVE TO FILE
AMENDED PETITION FOR REVIEW**

NOW COMES Petitioner, THE PREMCOR REFINING GROUP INC.

(hereinafter "Premcor"), by and through its attorneys, HODGE DWYER ZEMAN, and for its Motion For Leave To File Amended Petition For Review, states as follows:

1. On September 19, 2006, the Illinois Environmental Protection Agency ("Respondent") granted a final Clean Air Act Permit Program ("CAAPP") permit to Premcor's Hartford Terminal, a petroleum bulk storage and loading terminal, located in Hartford, Illinois.

2. On October 24, 2006, Premcor filed its Petition for Review ("Petition") of the CAAPP permit based on the fact that the Respondent failed to incorporate comments submitted by Premcor into the final CAAPP permit and, as such, the CAAPP permit does not reflect the current applicable requirements or the current operations of the Hartford Terminal.

3. On November 27, 2006, the Respondent filed a Motion to Dismiss the Petition ("Motion") arguing that the Petition failed "to provide adequate specificity to apprise either the Board or the Illinois EPA of the subject matter of the appeal." Motion

to Dismiss, The Premcor Refining Group Inc. v. Illinois EPA, PCB No. 07-03 at ¶5 (Ill.Pol.Control.Bd. Nov. 27, 2006) (requesting the Illinois Pollution Control Board (“Board”) dismiss Premcor’s petition or, in the alternative, require the filing of an Amended Petition for Review (“Amended Petition”).

4. On December 13, 2006, Premcor filed a Motion for Extension of Time requesting an additional 14 days, or until December 26, 2006, to file a Motion for Leave to File Amended Petition. On December 18, 2006, the Board Hearing Officer granted Premcor’s Motion.

5. Counsel for Premcor has consulted with the Respondent regarding the Respondent’s concerns as described in the Motion. Based on these discussions, it is Premcor’s understanding that filing an Amended Petition reiterating in detail the comments listed in Premcor’s exhibits to the original Petition will resolve the Respondent’s concerns.

6. While Premcor does not concur with Respondent’s position that Premcor’s original Petition for Review is inadequate, Premcor is seeking leave to file this Amended Petition in order to address the State’s concerns.

7. Premcor’s Amended Petition would not change the bases of Premcor’s appeal, but rather simply restates those bases in a form more acceptable to Respondent.

8. For the reasons stated above, Premcor respectfully moves the Board to grant Premcor leave to file the attached Amended Petition, and further moves the Board to deem said Amended Petition filed as of the date of the Board’s Order granting this Motion.

WHEREFORE, Petitioner, THE PREMCOR REFINING GROUP INC.,
respectfully moves the ILLINOIS POLLUTION CONTROL BOARD to grant it leave to
file an Amended Petition as set forth above, to deem the Amended Petition attached
hereto filed as of the date of the Board's Order granting this Motion, and to award it all
other relief just and proper in the premises.

Respectfully submitted,

THE PREMCOR REFINING GROUP INC.,
Petitioner,

By: /s/ Katherine D. Hodge
One of its Attorneys

Dated: December 22, 2006

Katherine D. Hodge
Monica T. Rios
HODGE DWYER ZEMAN
3150 Roland Avenue
Post Office Box 5776
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PREM-013\Fil\Premcor Motion for Leave to File Amended Petition

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

THE PREMCOR REFINING)	
GROUP INC.,)	
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Petitioner,)	
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v.)	PCB 2007-030
)	(CAAPP Permit Appeal)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

AMENDED PETITION FOR REVIEW

NOW COMES Petitioner, THE PREMCOR REFINING GROUP INC.

(hereinafter "Premcor"), by and through its attorneys, HODGE DWYER ZEMAN, pursuant to Section 40.2 of the Illinois Environmental Protection Act (415 ILCS 5/40.2) ("Act") and 35 Ill. Admin. Code § 105.Subpart C, and petitions the Illinois Pollution Control Board ("Board") for review of the Clean Air Act Permit Program ("CAAPP") permit granted to Premcor by the Illinois Environmental Protection Agency ("Illinois EPA") pursuant to Section 39.5 of the Act on September 19, 2006. In support of this Petition, Premcor states as follows:

I. BACKGROUND

1. Premcor owns and operates a petroleum bulk storage and loading terminal in Hartford, Illinois ("Hartford Terminal"), which is classified as a "major source" for purposes of Title V of the federal Clean Air Act, 42 U.S.C. §§ 7401, *et seq.*, and Section 39.5 of the Act, 415 ILCS 5/39.5.

2. Pursuant to Section 504 of the Clean Air Act, 42 U.S.C. § 7661b(c), and Section 39.5(5) of the Act, Premcor submitted an application for a CAAPP permit for its Hartford Terminal to Illinois EPA on March 7, 1996.

3. On November 7, 2003, Premcor submitted comments (attached hereto as Exhibit A) to Illinois EPA on a draft CAAPP permit that Premcor had received from Illinois EPA. Administrative Record at 503-507 (“R. at _____”).

4. A draft CAAPP permit was issued by Illinois EPA on May 27, 2004, and Illinois EPA honored a request for a public hearing that was received by Illinois EPA during the ensuing public comment period. This public hearing was held on July 13, 2004; therefore, the public comment period was extended until August 12, 2004. (R. at 586.)

5. On August 2, 2004, during the above-referenced comment period, Premcor submitted comments (attached hereto as Exhibit B) on the May 27, 2004 draft permit. R. at 942-945.

6. Thereafter, on August 26, 2004, Premcor submitted a letter (attached hereto as Exhibit C) intended to answer certain questions posed by the American Bottom Conservancy regarding the May 27, 2004 draft permit. R. at 961-967.

7. On April 3, 2006, Premcor further provided comments (attached hereto as Exhibit D) in response to Illinois EPA’s request for confirmation of the status of the storage tanks at the Hartford Terminal. R. at 996-997.

8. On August 3, 2006, Illinois EPA issued its “Project Summary for the Draft Clean Air Act Program (CAAPP) Permit” (“Project Summary”) (attached hereto as Exhibit E) for the Hartford Terminal. R. at 1000-1015. Illinois EPA stated that “[a]fter a

review of Premcor's application, ...[it] made a preliminary determination that the application met the standards for issuance of a CAAPP permit." R. at 1010. However, Illinois EPA failed to address the comments that Premcor had submitted regarding the May 27, 2004 draft permit. *See* discussion *infra*.

9. On or about August 3, 2006, Illinois EPA submitted a draft CAAPP permit for the Hartford Terminal to the United States Environmental Protection Agency ("USEPA") for its review. R. at 1016-1119.

10. In addition, during the time that elapsed between the issuance of the initial draft CAAPP permit for the public comment period (May 2004) and the submission of a subsequent draft permit (August 2006) to USEPA for review, Premcor applied for and received several construction permits for the Hartford Terminal. Construction permit #04070052 (attached hereto as Exhibit F) allowed for the storage and loading of ethanol and toluene at the terminal; permit #05030053 (attached hereto as Exhibit G) allowed for the installation of 19 Lube Cube containers; and permit #050120034 (attached hereto as Exhibit H and R. at 981-988) allowed for the installation of an on-site Soil Vapor Extraction system.¹

11. On September 19, 2006, Illinois EPA granted a final CAAPP permit, attached hereto as Exhibit I, for the Premcor Hartford facility. R. at 1122-1225. Although Premcor and Illinois EPA permit staff had discussions and have corresponded regarding Premcor's concerns with the draft permit, Illinois EPA failed to make certain changes to the CAAPP permit, requested by Premcor prior to September 19, 2006, as set forth more fully below.

¹ Certain exhibits to this Amended Petition for Review, including, but not limited to, Exhibit F and G, were omitted from the Administrative Record. Premcor intends to file a Motion to Supplement Administrative Record in order to add these documents to the Administrative Record.

12. On October 24, 2006, Premcor filed its original Petition for Review (“Petition”) of the CAAPP permit based on the fact that the Respondent failed to incorporate comments submitted by Premcor into the final CAAPP permit and, as such, the CAAPP permit does not reflect the current applicable requirements or the current operation of the Hartford Terminal. Petition at ¶¶10-12.

13. On November 27, 2006, the Respondent filed a Motion to Dismiss the Petition (“Motion”) arguing that the Petition failed “to provide adequate specificity to apprise either the Board or the Illinois EPA of the subject matter of the appeal.” Motion to Dismiss at ¶5 (requesting the Board dismiss Premcor’s petition or, in the alternative, require the filing of an amended petition).

14. Counsel for Premcor has consulted with the Respondent regarding the Respondent’s concerns as described in its Motion. Based on these discussions, it is Premcor’s understanding that filing this Amended Petition reiterating in detail Premcor’s comments regarding the issued CAAPP permit will resolve the Respondent’s concerns.

II. COMMENTS RAISED BY PREM COR PRIOR TO THE ISSUANCE OF THE FINAL CAAPP PERMIT

15. The following concerns were raised by Premcor prior to the issuance of the final CAAPP permit, but not incorporated by Illinois EPA into the final CAAPP permit.

16. Condition 1.3 of the CAAPP permit incorrectly lists Premcor’s Environmental Contact as Bill Malloy. R. at 1125. In August 2004, Premcor requested that the name be corrected to list Becky Malloy as Premcor’s Environmental Contact. R. at 943.²

² As discussed below, thereafter, Premcor’s Environmental Contact changed to Massoud Modarres.

17. In October 2005, Premcor submitted a notification (attached hereto as Exhibit J) of change in the responsible official for the Hartford Terminal. Premcor requested that the responsible official be changed from Ed Jacoby to Paul Brochu, Vice President of Logistics, Operations, and Development.

18. Condition 3.1.1 pertains to “[a]ctivities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows.” R. at 1128. Premcor requested the chemical storage tank and chemical storage drum listed in Condition 3.1.1 be removed since they are insignificant activities pursuant to 35 Ill. Admin. Code § 201.210(a)(17) and covered under Condition 3.1.3. R. at 943. Premcor further requested that “Lube Cube Storage Tanks” be added to Condition 3.1.1. *Id.* Consequently, Condition 3.1.1 should read

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

Lube Cube Storage Tanks

Id.

19. Condition 4.0 lists significant emission units at the Hartford Terminal. R. at 1130. Premcor requested that Tank 80-10, which is listed as part of Unit 03, be removed from Condition 4.0 since it has a fixed roof tank and only stores fuel oil #2. R. at 943. It is, therefore, classified as an insignificant activity under 35 Ill. Admin. Code § 201.210(a)(11) (Condition 3.1.3). For the same reasons, Premcor also requested that Tank 20-3 and Tank T-3-1 be removed from Unit 04 of Condition 4.0. *Id.*

20. In addition, Premcor requested that Tank T-72, which is an internal floating roof tank, be added to Unit 04 of Condition 4.0 since it will store gasoline and other organic materials with vapor pressure less than gasoline. R. at 943.

21. Premcor also requested that the Illinois EPA remove the anthracite/sand filters from Unit 05 listed in Condition 4.0 because they are not air emission control equipment. R. at 943. The anthracite/sand filters, which are part of the wastewater treatment plant, remove solids from the waste water stream. *Id.*

22. Because of the low level of road dust associated with Unit 06, Premcor requested that “Fugitive Emissions From Paved and Unpaved Roads” be removed from Condition 4.0. R. at 943, 945. Due to the low level of road dust associated with the facility, Condition 5.2.5(a) of the permit should be adequate to regulate fugitive dust emissions from within the source. R. at 945.

23. Premcor also clarified in its comments that the “Gasoline Storage Tanks” described as Unit 08 in Condition 4.0 were listed as insignificant activities in the original CAAPP application and that all the gasoline tanks listed in Condition 7.8 of the draft permit have been permanently removed from the facility, with the exception of the Gasoline Tank Wells, which continue to be insignificant activities. R. at 943. Premcor, therefore, requested that Tank A-2 be added to Condition 4.0 and that the description of Unit 08 be changed to “Tank A-2” because as a small horizontal fixed roof storage tank, which is used as a pressure relief tank, it is appropriately listed in Condition 4.0. *Id.*

24. Condition 5.5.1 includes a table entitled “Permitted Emissions of Regulated Pollutants.” R. at 1135. Premcor requested that the table be updated to reflect the change in VOM emissions due to the reclassification of storage tanks. *Id.* The table should be revised as follows: VOM “Tons/Year” from “230.30 tpy” to 212.69 tpy” and the “Total Regulated Pollutant Emissions” from “282.28 tpy” to “264.67 tpy.” R. at 943.

25. Condition 5.2.7 incorrectly states that Premcor's original CAAPP application was not submitted or deemed complete by April 20, 1998. R. at 1134. Illinois EPA received Premcor's original application for the Hartford facility on March 7, 1996, and the Illinois EPA deemed the application complete on March 29, 1996. R. at 969. As such, Premcor requested that Condition 5.2.7 be corrected to read as follows:

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

R. at 963.

26. The Hartford Working Group ("HWG") (IEPA ID 119050AAS) has submitted an application for a construction permit authorizing the replacement of the existing thermal treatment unit ("TTU") with a thermal oxidizer ("TO"). R. at 943. The TO will be operated by HWG under a separate CAAPP permit. *Id.* The TTU was permanently shut down in 2005. *Id.* Therefore, Premcor requested that Condition 7.1 be removed when the TO has been constructed. *Id.* An application for significant modifications will be submitted to remove this unit from the CAAPP permit.

27. Condition 7.1.10(b) describes Premcor's reporting requirements regarding the vapor control system. R. at 1141. Although Condition 7.1 should be removed, as referenced above, Premcor requested that if this condition is not removed, it be clarified to state that the annual report required by Condition 7.1.10(b) may be submitted with the

Annual Emissions Report, which is required by Condition 5.7.2. R. at 944. Premcor suggested the following language:

The Permittee shall submit an annual report of emissions listed in Condition 7.1.6 with supporting calculations. The report shall include a summary of time periods, when the thermal treatment unit flame was extinguished. This annual report may be submitted as a supplement to the Permittee's Annual Emissions Report, which is required by Condition 5.7.2.

Id.

28. Condition 7.2.7(c) provides that if a flare is used as a control device to comply with 35 Ill. Admin. Code § 219.762(a)(1), compliance will be “determined by the methods described in Section 219.429(c).” R. at 1146. Premcor requested that Condition 7.2.7(c) be clarified by providing more detail regarding the requirements of 35 Ill. Admin. Code § 219.429(c) and suggested the following language:

If the control device used to comply with 35 IAC Section 219.762(a)(1) of this Subpart is a flare, it shall:

- 1) *Be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours as determined by U.S. EPA Method 22.*
- 2) *Be operated with a pilot flame present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the flame.*
- 3) *Be steam-assisted, air-assisted, or nonassisted.*
- 4) *Be used only with the net heating value of the gas being combusted being 11.2 MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted; or with the net heating value of the gas being combusted being 7.45 MJ/scm (200 Btu/scf) or greater if the flare is nonassisted.*

R. at 944.

29. In order to maintain continuity of the permit condition numbering system, Premcor requested that Condition 7.2.7(d)(iii) be corrected to read “As an alternative to subsection (d)(ii) of this Section,...” as opposed to “As an alternative to subsection (d)(2) of this Section,....” R. at 944.

30. Premcor also requested that the following compliance option, as provided in 35 Ill. Admin. Code § 219.762(b)(3)(B), be added to the permit as Condition 7.2.7(d)(iv):

As an alternative to subsections (d)(ii) and (d)(iii) of this Section, an owner or operator of a marine terminal may obtain documentation as described in 35 IAC 219.770(b) that the marine vessel has been vapor-tightness tested within either the preceding 12 months or the preceding 14 months, if the test is being conducted as part of the Coast Guard's reinspection of the vessel required under 46 CFR 31.10-17, using Method 21 of Part 60, Appendix A, incorporated by reference at Section 219.112 of this Part, as described in Section 219.768(b) of this Subpart.

R. at 944.

31. In order to maintain continuity of the permit condition numbering system, Premcor requested that Condition 7.2.7(f) and 7.2.7(g) be relabeled 7.2.7(e) and 7.2.7(f), respectively. *Id.*

32. Premcor requested that Conditions 7.2.9(d) and 7.2.9(e) be removed because neither condition applies to the Hartford Terminal's operations. *Id.* Premcor does not use the emissions reduction compliance option at the marine terminal as described in Section 7.2.9(d), and the requirement in Condition 7.2.9(e) mandating initial certification of marine terminal operations was required, and complied with, in 1996. *Id.*

33. Condition 7.3.2 lists emission units and air pollution control equipment for Unit 03. R. at 1152. Premcor requested that Tank 80-10 be removed from the list of tanks included in Unit 03 because it is a fixed roof tank and only stores fuel oil #2. *Id.* It

is, therefore, classified as an insignificant activity under 35 Ill. Admin. Code § 201.210(a)(11) (Condition 3.1.3). R. at 1152.

34. Condition 7.4.2 lists emission units and air pollution control equipment for Unit 04. R. at 1158. Premcor requested that Tank 20-3 and Tank T-3-1 be removed from the list of tanks included in Unit 04 because they are fixed roof tanks that will only store fuel oil #2, and are classified as insignificant activities under 35 Ill. Admin. Code § 201.210(a)(11) (Condition 3.1.3). R. at 944.

35. Premcor further requested that Tank T-72 be added to Unit 04 of Condition 7.4.2 because it is an internal floating roof tank. *Id.*

36. Premcor also commented regarding Condition 7.5 that the HAP speciation of VOM emissions from the wastewater treatment plant was updated in its supplement to the CAAPP, dated July 2004. R. at 945.

37. Premcor requested that Illinois EPA remove Condition 7.5.5 from the CAAPP permit because, as previously discussed, the anthracite/sand filters are not air emissions control equipment and should not be subject to periodic inspections under the CAAPP permit. *Id.*

38. As referenced above, due to the low level of road dust associated with paved and unpaved roadways at the Hartford Terminal, the requirement in Condition 7.6 regarding the annual calculation of emissions from road traffic is unnecessary and over burdensome. Premcor, therefore, requested that Condition 7.6 be removed. R. at 945. Condition 5.2.2(a) is adequate to regulate fugitive dust emissions from roads at the facility. *Id.*

39. Premcor requested that references to “petroleum refineries” be removed from Conditions 7.7.7, 7.7.8 and 7.7.9 in order to avoid confusion regarding the nature of Premcor’s operations under this permit. R. at 507. Condition 7.7.7 should read:

As prescribed by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC 219.447, which prescribes that an owner or operator of a marine terminal subject to 35 IAC 219.445 of this Part shall, for the purpose of detecting leaks, conduct a component monitoring program consistent with the following provisions:

Condition 7.7.8 should read:

As prescribed applicable to marine terminals by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC 219.446, which provides that an owner or operator shall prepare a monitoring program which contains, at a minimum:

- a) *An identification of all marine terminal components and the period in which each will be monitored pursuant to 35 IAC 219.447 [35 IAC Section 219.446(a)];*
- b) *The format for the monitoring log required by 35 IAC 219.448 [35 IAC Section 219.449(b)];*
- c) *A description of the monitoring equipment to be used pursuant to 35 IAC 219.447 of this Part [35 IAC Section 219.446(c)];*
- d) *A description of the methods to be used to identify all pipeline valves, pressure relief valves in gaseous service and all leaking components, such that they are obvious to both terminal personnel performing monitoring and Agency personnel performing inspections [35 IAC Section 219.446(d)].*

Condition 7.7.9 should read:

As prescribed applicable to marine terminals by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC 219.448, which prescribes that an owner or operator shall maintain a leaking component monitoring log which shall contain at a minimum, the following information:

R. at 507.

40. Condition 7.7.1 does not accurately reflect the operations of the Hartford Terminal because it references a natural gas processing plant, which does not exist at the Terminal. Premcor requested that Condition 7.7.1 be updated to read:

Fugitive emissions from equipment components, such as valves, flanges, etc., are generated during the processing of material through the piping distributed throughout the source.

R. at 506.

41. Condition 7.8 pertains to Unit 08 – Gasoline Storage Wells. R. at 1188. Premcor requested that the gasoline storage tanks identified in this section, including two contractor gasoline tanks, portable 300 gallon storage tanks, and the gasoline tank west of the main maintenance shop, be removed from the permit because they are no longer operated at the Hartford facility. R. at 945. Premcor further explained that the units identified as gasoline tank wells in the draft permit are part of remediation operations at the Hartford facility. *Id.* The gasoline tank wells consist of ten relatively small (500 gallon) double-walled containers that are commonly referred to as “Lube Cubes,” which hold hydrocarbons (including gasoline) pumped from vertical recovery wells until the contents can be collected by a vacuum truck and removed from the facility. *Id.* Emissions of both VOM and HAP from these tanks are small, so that they should be classified as insignificant under 35 Ill. Admin. Code § 201.211(a). *Id.*

42. Premcor further requested that Tank A-2 be added to Condition 7.8. R. at 945. Premcor explained that Tank A-2 is a small (24,900 gallon) horizontal storage tank located at the river dock and is used as a pressure relief tank, where either gasoline or distillate may be temporarily stored in the event that the product pressure in the river dock loading lines becomes too great and must be relieved. *Id.* Because of its size, the

only control equipment necessary for the operation of this tank is submerged fill, as required by 35 Ill. Admin. Code § 219.122(b). R. at 945. In addition, Premcor requested that all references to “affected Tank Wells” in Condition 7.8 be changed to “affected storage tank” to reflect the addition of Tank A-2 to Condition 7.8. *Id.*

43. Premcor requested that the second paragraph of Condition 7.8.6 be removed because it is entirely informational and does not contain any permit requirements. Condition 7.8.6 should read as follows:

7.8.6 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.

Id.

44. As stated above, prior to the issuance of the final CAAPP permit, Premcor requested all of the above changes to the permit in order to ensure that the permit accurately reflects the operation of the Hartford Terminal and the legal requirements applicable to that operation. However, Respondent did not incorporate any of those changes into the final permit.

III. ADDITIONAL COMMENTS FOR CONSIDERATION BY THE ILLINOIS EPA

45. In addition to the comments above, Premcor has the following additional comments on the final CAAPP permit.

46. Since Premcor's request in August 2004 regarding a change to the Environmental Contact listed in the permit cover page and Condition 1.3 of the final permit, Massoud Modarres has become the person in charge of such matters at the Hartford Terminal. Premcor therefore requests that the Environmental Contact in

Condition 1.3 be changed to Massoud Modarres, as well as updating the telephone number to (618) 255-5109. *See* ¶16 *supra*.

47. Because of the removal of “Fugitive Emissions From Paved and Unpaved Roads” from Condition 4.0, Premcor requests that the unit number in Condition 4.0 for Fugitive VOM Emissions be changed from Unit 07 to Unit 06. *See* R. at 1130.

48. For consistency, Premcor requests that the Illinois EPA update the unit number for Gasoline Storage Tanks from Unit 08 to Unit 07. *See* R. at 1130. In addition, as more fully explained below, Premcor requests that Unit 09 and Unit 10 be removed from the “Significant Emission Units” table, and consequently the unit number for the Soil Extraction System be updated from Unit 11 to Unit 08.

49. Condition 7.1.3(b)(ii) references Condition 7.1.3(c)(i), which does not exist in this permit. R. at 1139. Premcor requests clarification regarding this reference.

50. Premcor also requests that the reference to Tank “102-5” in Condition 7.3.2 be revised to “120-5,” which is the true description of the tank. *See* R. at 1152.

51. Because anthracite/sand filters are not air emissions control equipment, Premcor requests that they be removed from the list of emission control equipment in Condition 7.5.2. *See* R. at 1174.

52. Premcor requests that the section number for Fugitive Emissions from Leaking River Dock Flare Components be changed from Section 7.7 to Section 7.6 to remain consistent with the permit outline due to the removal of the sections for Fugitive Emissions from Paved and Unpaved Roadways. *See* discussion above.

53. In order to be more specific regarding the operations at the Hartford Terminal, Premcor requests to amend the language it proposed prior to the permit's issuance by updating Condition 7.7.1 as follows:

Fugitive emissions from equipment components, such as valves, flanges, etc., are generated during the processing of material through the vapor collection and control system located at the River Dock.

See ¶40 supra.

54. Condition 7.9 should be removed because Lube Cubes are classified as insignificant activities per 35 Ill. Admin. Code § 201.211(a). The Lube Cubes should be listed in Condition 3.1.1 as previously discussed. *See ¶18 supra.*

55. Condition 7.9.6(a) is a source-wide emission limit taken to ensure that the Hartford Terminal will remain a minor source of HAP emissions. R. at 1191. This condition is redundant with Condition 5.5.2 of the permit; thus, Condition 7.9.6(a) should be moved to Condition 5.0 of the permit. In addition, Condition 7.9.9 contains recordkeeping requirements to ensure compliance with the source-wide HAP emission limit, and therefore, it should be moved to Condition 5.6 of the permit. *See R. at 1192, 1136.*

56. In order to more accurately describe the operations at the Hartford Terminal, Premcor requests to amend the language it proposed prior to the permit's issuance regarding the removal of the term "petroleum refineries" from Conditions 7.7.7, 7.7.8 and 7.7.9. *See ¶39 supra.* Specifically, Condition 7.7.7 should read:

As prescribed applicable to marine terminals by 35 IAC 219.766, the affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC 219.447, which prescribes that an owner or operator subject to 35 IAC 219.445 of this Part shall, for the purpose of detecting leaks, conduct a component monitoring program consistent with the following provisions:

Condition 7.7.8 should read:

As prescribed applicable to marine terminals by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC 219.446, which prescribes that an owner or operator shall prepare a monitoring program which contains, at a minimum:

- a) *An identification of all components and the period in which each will be monitored pursuant to 35 IAC 219.447 [35 IAC 219.446(a)];*
- b) *The format for the monitoring log required by 35 IAC 219.448 [35 IAC 219.446(b)];*
- c) *A description of the monitoring equipment to be used pursuant to 35 IAC 219.447 [35 IAC 219.446(c)];*
- d) *A description of the methods to be used to identify all pipeline valves, pressure relief valves in gaseous service and all leaking components such that they are obvious to both personnel performing monitoring and Agency personnel performing inspections [35 IAC 219.446(d)].*

Condition 7.7.9 should read:

As prescribed applicable to marine terminals by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC 219.448, which prescribes that an owner or operator shall maintain a leaking components monitoring log which shall contain, at a minimum, the following information:

57. Condition 7.10, as listed in the permit, contains alternate modes of operation for emission units that are already included in Sections 7.2, 7.3 and 7.4 of the permit. See R. at 1195, 1143-1173. Section 7.10 mirrors construction permit #04070052, which permits the storage of alternate materials in existing storage tanks and loading of alternate materials through the existing river barge dock at the Hartford Distribution Center. See Exhibit F. Premcor requests that the conditions from this section be

incorporated into Condition 7.2, 7.3 and 7.4 as appropriate. Condition 7.10 should, therefore, be removed.

58. Premcor requests that the section number for the Soil Vapor Extraction System be updated from Condition 7.11 to Condition 7.8 to remain consistent with the permit outline due to the removal of the sections for “Lube Cubes” and “Storage and Barge Loading of Ethanol and Toluene.”

IV. CONCLUSION

59. For the above-referenced reasons, the CAAPP permit does not reflect the current applicable requirements or the current operations of the facility, and thus is not “consistent with the Clean Air Act and regulations promulgated thereunder.” 415 ILCS 5/39.5. Further, certain conditions discussed herein are not required to “accomplish the purposes and provisions of this Act and to assure compliance with applicable requirements.” *Id.*

60. Accordingly, Premcor requests that the comments as detailed in this Amended Petition be incorporated into a revised CAAPP permit issued for the Hartford Terminal.

From: <fpaterso@trinityconsultants.com>
To: "Sunil Suthar" <Sunil.Suthar@epa.state.il.us>
Date: 11/7/2003 9:56:23 AM
Subject: Premcor Hartford Draft Permit Comments

Sunil:

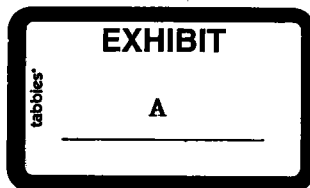
Tom Mroz (Premcor) sent his comments on the draft CAAPP permit for the Hartford Distribution Center to Mr. Brad Frost yesterday. His comments are included in the attached document.

If you have any questions regarding the comments, please give me a call at (630) 574-9400.

Thanks,
Fern Paterson

(See attached file: Hartford Draft Permit Comments(r2).pdf)

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.



000503

The Premcor Refining Group Inc.
Hartford Distribution Center

Comments on the Draft Permit (Permit No. 96030082) - Public Comment Begins October 10, 2003

Comments	Page	Condition	Comments & Requested Changes
1	All	N/A	I.D. No.: 119050AAA (Permit Header)
2	All	N/A	Application No.: 96030082 (Permit Header)
3	1	N/A	Attn: Change from "Bill" Malloy to "Becky" Malloy, as listed in the CAAPP permit application
4	1	N/A	Responsible Official: Change from Bill Malloy to Ed Jacoby, Vice President of Wholesale, Marketing, and Distribution (As provided in the CAAPP permit application)
5	11	4.0 (Unit 03)	Correction. Numerous typographical errors in "Description" column. Tanks identifications should include, "120-1, 120-2, 120-3, 120-4, 120-5, 120-8, 80-4, 80-5, 80-10, 80-11, 20-8, 10-20, 5-10. (Identifications in bold text are incorrect in the draft document)
6	12	4.0 (Unit 04)	Clarification: Tank 120-9 is subject to Subpart K. Classify this tank as a Group 3 storage tank to clarify that it is regulated differently than the Group 1 (Subpart Kb) and Group 2 (No NSPS) tanks.
7	12	4.0 (Unit 04)	Correction. Valves, flanges, seals (etc) regulated under this group are not necessarily located at the river dock. Rename Unit 07, "Fugitive VOM Emissions from Valves, Flanges, Seals, and Miscellaneous Components."
8	14	5.2.3(a)-(b)	Remove Condition. An operating permit condition to direct compliance with fugitive PM requirements is only required to manage compliance with fugitive emissions standards in 35 IAC 212.304-308 and 35 IAC 212.316 [35 IAC 212.309(a)]. Premcor is not affected by any of these standards. As stated in Condition 5.2.2(a), fugitive emissions at Hartford must meet the requirements of 35 IAC 212.301 and 35 IAC 212.314 -- and compliance with the standards are "considered to be assured by the inherent nature of operations at this source".
9	15	5.2.3(c)	Remove Condition. This standard is required for roads surrounding storage piles, and certain areas of mining and manufacturing facilities. The Hartford Distribution Center does not have storage piles, nor is it a mining or manufacturing facility.
10	15	5.2.5	Correction. This condition indicates that the source is subject to the Accidental Release Prevention regulations of 40 CFR Part 68. THIS SOURCE IS NOT SUBJECT TO 40 CFR PART 68. Rewrite this condition as follows: "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)-(ii): (a) A compliance schedule for meeting the requirements of 40 CFR Part 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."
11	23	7.1.1	Rewrite/Simplify. "Operation of a vapor control system that captures and removes hydrocarbon vapors from the vadose zone (below ground surface) The control system has the capability to process 1,600 standard cubic feet per minute of contaminated air containing 1,200 pounds per hour of hydrocarbons. The vapor control system consists of control boreholes, a knock out drum, vacuum blowers (75 hp/electric), and an enclosed flare (thermal treatment unit). All emissions vapors from the vapor control system are routed to and through the thermal treatment unit. Emissions of CO, NOx, and VOM are calculated using AP-42 SO2 emissions are derived using an engineering estimate assuming that all sulfur contained in the recovered gasoline vapor is converted to SO2"
12	23-26	Section 7.1	Clarification/Correction. Change all references to the "flare" in Section 7.1 (Vapor Recover System) to the "thermal treatment unit" to avoid confusion between the River Dock flare and the thermal treatment unit (enclosed flare) that is used to control emissions from the vapor recover system.
13	23	7.1.3(a)	Correction. The vapor recovery system is not a wastewater treatment system, but a system that treats vapors that are recovered from control boreholes. Rewrite Condition 7.1.3(a) as follows, "An 'affected vapor control system' for the purpose of these unit-specific conditions, is the wastewater treatment vapor control system described in Conditions 7.1.1 and 7.1.2."
14	23	7.1.3(b)	Remove Condition. The vapor recovery system is not a wastewater treatment system, but a system that treats vapors that are recovered from control boreholes. The vapor recovery system does not include a water separator. Therefore, 35 IAC 219.141(a) does not apply.

The Premor Refining Group Inc.
Hartford Distribution Center

Comments on the Draft Permit (Permit No. 96030082) -- Public Comment Begins October 10, 2003

Comment	Page	Condition	Comments & Requested Changes
15	24	7.1.5	Rewrite. "The flare thermal treatment unit shall be in operation at all times when the affected wastewater treatment vapor recovery system is in operation and emitting air contaminants that would not comply with Condition 7.1.3 without the use of the thermal oxidizer treatment unit."
16	26	7.1.9(b)	Remove Condition. The vapor recovery system is not a wastewater treatment system, but a system that treats vapors that are recovered from control borochoes. No wastewater is treated by the system, and this recordkeeping requirement does not apply.
17	27	7.2.1	Rewrite/Simplify. "The marine vessel loading terminal (river dock) that delivers high-vapor pressure materials (e.g. gasoline products, naphtha, and rerun materials) and low-vapor pressure materials to marine vessels that operate along the Mississippi River. The river dock consists of two (2) loading berths, and can deliver product to a barge vessel at each of the berths simultaneously. The maximum pump rate of each berth at the river dock is 4,000 barrels per hour for both high- and low-vapor pressure materials. The typical pump rate for each berth is 300 barrels per hour. The loading apparatus is equipped with a vapor recovery hose positioned at the marine vessel loading positions for hook up to the flare. The vapor hose and associated piping transports the hydrocarbon-enriched air displaced from the marine vessels during loading to a liquid seal knockout vessel and then to the flare."
18	29	New Condition	Add Condition 7.2.5(c). As stated in Condition 7.2.4(d), this source has agreed to limit the total amount of high-vapor pressure material to marine vessel bno greater than 9.5 MMbb/yr. Include this limitation in the "Control Requirements and Operational Limitations" to avoid confusion.
19	29-30	7.2.7(a)-(b)	Clarification. These conditions apply to the fugitive equipment (e.g. valves, flanges, seals, etc.). These components are regulated under Section 7.7, and these requirements are included in this section. For clarity, replace these requirements with the following text, "Pursuant to 35 IAC 219.765, the Permittee shall comply with the requirements regarding detection and repair of leaks of 35 IAC 219.445. The requirements of this rule are included in Section 7.7 of this permit."
20	30	7.2.7(c)	Clarification. Include more detail regarding the requirements of 35 IAC 219.429(c), as follows: "If the control device is a flare, it shall: 1) Be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. 2) Be operated with a pilot flame present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the flame. 3) Be steam-assisted, air-assisted, or nonassisted. 4) Be used only with the net heating value of the gas being combusted being 11.2 MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted, or with the net heating value of the gas being combusted being 7.45 MJ/scm (200 Btu/scf) or greater if the flare is nonassisted."
21	30	7.2.7(d)	Remove Condition. The only control device utilized at the River Dock is the flare. This "other control devices" condition does not apply, and should be removed.
22	34	7.2.12(c)(ii) Emission Factors	Clarification/Correction. Either berth at the river dock may load gasoline to a marine vessel, though only one marine vessel may be loaded with gasoline at any one time. The way the table in the current draft permit is presented implies that only one berth is capable of loading gasoline, which is inaccurate. Revise the emissions factor table as follows: Material Loaded Emission Factor (lb/1000 gallons) Gasoline 3.90 Disillate Fuel Oil No. 2 0.012
23	36	7.3.1	Correction. Tanks are used for the storage of gasoline (RVP 15), ethanol, and all VPLs with vapor pressure lower than gasoline.
24	36	7.3.2	Correction. Numerous typographical errors in "Description" column. Tanks identifications should include, "120-1, 120-2, 120-3, 120-4, 120-5, 120-8, 80-4, 80-5, 80-10, 80-11, 20-8, 10-20, 5-10. (See Comment Number 5)
25	41	7.3.11(b)	Remove Condition. Condition 5.8 does not account for any changes. Therefore, Condition 7.3.11(b) is not required.

000505

The Pemcor Refining Group Inc.
Hartford Distribution Center

Comments on the Draft Permit (Permit No. 96030082) – Public Comment Begins October 10, 2003

Comment	Page	Condition	Comments & Requested Changes
26	42	7.3.12(a)	Correction. Hartford is not located within the Chicago nonattainment area, and will not be affected by the ERMS program. Correct as follows: "Emissions from each affected storage tank shall be determined through the use of the TANKS program, AP-42 upon which the Tanks Program is based, or any other method that utilizes USEPA approved emission factors for storage tank emissions. For the ERMS seasonal report, the calculations must be consistent with the ERMS baseline determination. "
27	43	7.4.2	Clarification: Tank 120-9 is subject to Subpart K. Classify this tank as a Group 3 storage tank to clarify that it is regulated differently than the Group 1 (Subpart Kb) and Group 2 (No NSPS) tanks.
28	46	7.4.5(a)	Correction: As written, this condition implies that tank 120-9 is subject to Subpart Kb. This tank is subject to Subpart K, which is less stringent than Subpart Kb. "Each affected tank of Group 1 and tank 120-9 shall comply with the requirements of 40 CFR 60.112b(a)(1)(i) and 40 CFR 60.112(a)(1), respectively, which requires the use of a fixed-roof-in-combination with an internal floating roof that is equipped with one of the following closure devices: (...)"
29	48-50	7.4.7	Correct Numbering: The current numbering convention for this condition is confusing (and incorrect on Page 50, where the subsequent conditions are 7.4.7(i) to 7.4.7(b)). Correct numbering so that Group 1 requirements are under 7.4.7(a), with subconditions "i" to "x".
30	51	7.4.8(b)	Correction: This condition applies to vessels storing VPL (not VOL as indicated in the current text). "The Permittee shall inspect the floating roof seals of each affected Group 2 tank when storing a VCL VPL with a vapor pressure of 1.5 psia or greater (...)"
31	54	7.4.9(a)	Correction: The inspection condition is misreferenced. Correct as follows: "(...)Keep a record of each Annual and Out-of-Service Inspection performed as required by Condition 7.4.8(a)(i)-(ii) and (b). [40 CFR 60.115b(a)(2)] (...)"
32	54	7.4.9(b)	Correction: The inspection condition referenced in not an Out-of-Service inspection. To avoid confusion, this condition should reference ALL out-of-service inspection requirement (e.g. for all groups) as follows: "The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with the Out-of-Service Inspection requirements of Conditions 7.4.8(a)(ii), 7.4.8(c), and 7.4.8(d)(iv) 7.4.8(b). (...)"
33	55	7.4.9(d)	Remove Condition. There are no emissions limitations provided in Condition 7.4.6. Therefore, this condition, which is provided to "demonstrate compliance with the emission limitations of Condition 7.4.6", is unnecessary and confusing and should be removed.
34	55	7.4.9(h)	Remove Condition. This is a recordkeeping requirement to determine when a complete inspection is required (this Condition misreferences Condition 7.4.8(b)), when it should reference Condition 7.4.8(c). This is identical to the requirement provided in Condition 7.4.9(a) (See Comment 37). Therefore, this Condition is unnecessary and confusing and should be removed.
35	58	7.4.11(b)	Remove Condition. Condition 5.8 does not account for any changes. Therefore, this Condition is not required.
36	64	7.6.1	Correction: There are no storage piles with potential fugitive dust emissions at the Hartford Distribution Center. "Moving vehicles create particulate matter (road dust) emissions on paved and unpaved roadways. Particulate Matter is also emitted from storage piles"
37	67	7.7.1	Correction: This description does not seem to reflect Hartford operations, including references to a natural gas processing plant. Pemcor recommends the following text for this description, "Fugitive emissions from equipment components, such as valves, flanges, etc., are generated during the processing of material through the piping distributed throughout the source."
38	67	"7.11.6" (Correct to 7.7.6)	Correction: In addition to the numbering error noted in the previous column, this condition should eliminate the reference to a "natural gas processing plant", which does not exist at the Hartford Distribution Center. "In addition to Condition 5.2.2 and the source-wide emission limitations in Condition 5.5, the affected natural gas processing plant and unit is subject to the following: (...)"

The Premcor Refining Group Inc.
Hartford Distribution Center

Comments on the Draft Permit (Permit No. 96030082) – Public Comment Begins October 10, 2003

Comment	Page	Condition	Comments & Requested Changes
39	69	7.7.7(a) (The "(a)" appears to have been omitted)	<p>Clarification: Remove all references to "refinery" operations from this condition to avoid confusion: "As prescribed applicable to marine terminals also by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC Section 219.445 which prescribes that the owner or operator of a petroleum-refinery marine terminal subject to 35 IAC Section 219.445 of this Part shall, for the purpose of detecting leaks, conduct a component monitoring program consistent with the following provisions: (...)"</p>
40	70	7.7.8	<p>Clarification: Remove all references to "refinery" operations from this condition to avoid confusion: "As prescribed applicable to marine terminals also by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC Section 219.446 which provides that the owner or operator of a petroleum-refinery shall prepare a monitoring program plan per which contains at a minimum: a) An identification of all refinery marine terminal components and the period in which each will be monitored pursuant to Section 35 IAC 219.447; [35 IAC Section 219.446(a)] b) The format for the monitoring log required by 35 IAC Section 219.448 of this Part; [35 IAC Section 219.446(b)] c) A description of the monitoring equipment to be used pursuant to 35 IAC Section 219.447 of this Part; and [35 IAC Section 219.446(c)] d) A description of the methods to be used to identify all pipeline valves, pressure relief valves in gaseous service and all leaking components such that they are obvious to both refinery terminal personnel performing monitoring and Agency personnel performing inspections. [35 IAC Section 219.446(d)]"</p>
41	70	"7.11.9(a)" (Correct to 7.7.9(a))	<p>Clarification: Remove all references to "refinery" operations from this condition to avoid confusion: "As prescribed applicable to marine terminals also by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC 219.448 which prescribes that the owner or operator of a petroleum-refinery shall maintain a leaking components monitoring log which shall contain, at a minimum, the following information: (...)"</p>
42	71	7.7.10	<p>Clarification: Remove all references to "refinery" operations from this condition to avoid confusion: "As prescribed applicable to marine terminals also by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC 219.449, Reporting of Leaks, which provides that the owner or operator of a petroleum-refinery shall: (...)"</p>
43	74 - 75	Section 7.8	<p>Revise. The following revisions should be made to the Section 7.8 requirements to reflect current operations at the Hartford Distribution Center: (1) Gasoline storage tanks identified in this section, including two (2) contractor gasoline storage tanks, portable 300 gal storage tanks, and the gasoline tank west of the main maintenance shop are no longer owned or operated at the Premcor Hartford Distribution Center, and they should be removed from this permit (2) The "Gasoline Tank Wells", are NOT gasoline storage tanks, but part of the remediation operations at the Hartford Distribution Center. The tank wells are small, double-walled vessels that are commonly referred to as "Lube Cubes". The Lube Cube capacity is 500 gal, and its purpose is to hold hydrocarbons (including gasoline) pumped from vertical recovery wells until the contents can be collected by a vacuum truck and removed from the facility. Premcor believe that these recovery wells should be regulated as "miscellaneous" stationary sources of VOM, as they site remediation units and not storage vessels. Specifically, the units should be regulated by the 8.0 lb VOM/hr limitation provided in 35 IAC 219.301.</p>



The Premcor Refining Group, Inc.
Delaware City Refinery
P.O. Box 7000
Delaware City, DE 19706-7000
302/834-6000

August 2, 2004

Mr. Sunil Suthar
Illinois Environmental Protection Agency
Division of Air Pollution Control
1021 North Grand Avenue East
Springfield, Illinois 62794

RE: *Comments on Final Draft/Proposed CAAPP Permit No. 96030082
The Premcor Refining Group Incorporated, Hartford Distribution Center
(Facility ID No. 119050AAA)*

Dear Mr. Suthar:

On May 27, 2004, the Illinois Environmental Protection Agency (IEPA) issued a public notice for the proposed issuance of a Clean Air Act Permit Program (CAAPP) permit (Application No. 96030082) for The Premcor Refining Group Inc.'s (Premcor's) Hartford Distribution Center. As provided in the public notice, IEPA is accepting comments on the proposed CAAPP permit until August 12, 2004, which is 30 days after the public hearing date.

With this correspondence, Premcor is providing to IEPA comments to the Proposed CAAPP permit as well as a Supplement to Premcor's September 2003 CAAPP application. Premcor's comments are included in the letter attachment. If there are any questions regarding the attached comments, please contact me at (618) 254-7301 ext. 261 or Mr. Tony Schroeder of Trinity Consultants at (630) 574-9400.

Sincerely,

THE PREMCOR REFINING GROUP INC.

Rebecca Malloy
Environmental Specialist

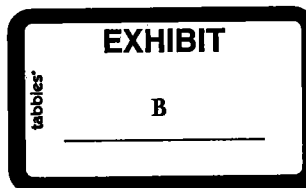
Enclosures: *Comments on the Draft Permit
Supplement to CAAPP Application*

cc: Mr. Brad Frost, IEPA
Mr. Ed Jacoby, Premcor
Mr. Tony Schroeder, Trinity Consultants

RECEIVED

AUG 03 2004

IEPA - DAPC - SPFLD



000942

The Premcor Refining Group Inc.
Hartford Distribution Center

000943

Comments on the Draft Permit (Permit No. 96030082) -- Public Comment Begins May 27, 2004 and Ends August 12, 2004.

Comment	Page	Condition	Comments & Requested Changes
1	4	1.3	Correction. Change from "Bill" Malloy to "Becky" Malloy, as listed in the CAAPP permit application.
2	8	3.1.1	Update. Several of the insignificant activities listed in the original permit application are no longer present at the Hartford Distribution Center. This Condition should read: "3.1.1 Activities determined by Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows: Lube Cube Storage Tanks" Please see the revised insignificant activity identification form (297-CAAPP) included in the enclosed Supplement to CAAPP application.
3	8	3.1.1	Correction. The chemical storage tank and chemical storage drum listed in this condition are insignificant activities per 35 IAC 201.210(a)(17). These activities are covered under Condition 3.1.3 and should therefore not be listed in this Condition.
4	10	4.0 (Unit 03)	Correction. Tank 80-10 is a fixed roof tank, not an external floating roof tank, as identified in the original permit application. This tank will only store fuel oil #2 and will therefore be classified as an insignificant activity under 35 IAC 201.210(a)(11) (Condition 3.1.3). Please see the revised identification form (232-CAAPP - External Floating Roof Tanks) included in the enclosed Supplement to CAAPP application.
5	10	4.0 (Unit 04)	Correction. Tank 20-3 is a fixed roof tank, not an internal floating roof tank, as identified in the original permit application. This tank will only store fuel oil #2 and will therefore be classified as an insignificant activity under 35 IAC 201.210(a)(11) (Condition 3.1.3). Please see the revised identification form (232-CAAPP - Internal Floating Roof Tanks) included in the enclosed Supplement to CAAPP application.
6	10	4.0 (Unit 04)	Correction. Tank T-3-1 is a fixed roof tank, not an internal floating roof tank, as identified in the original permit application. This tank will only store fuel oil #2 and will therefore be classified as an insignificant activity under 35 IAC 201.210(a)(11) (Condition 3.1.3). Please see the revised identification form (232-CAAPP - Internal Floating Roof Tanks) included in the enclosed Supplement to CAAPP application.
7	10	4.0 (Unit 04)	Correction. Tank T-72 is an internal floating roof tank, not a fixed roof tank, as identified in the original permit application. This tank will store gasoline and other organic materials with vapor pressures less than gasoline and should therefore be included in Unit 04. Please see the revised identification form (232-CAAPP - Internal Floating Roof Tanks) included in the enclosed Supplement to CAAPP application.
8	11	4.0 (Unit 05)	Correction. The anthracite/sand filters are not air emission control equipment, as identified in the draft permit, but serve to remove solids from the waste water stream. The anthracite/sand filters should not be identified as emission control equipment in the permit.
9	11	4.0 (Unit 06)	Remove Condition. Please remove Unit 06 from the "Significant Emission Units" table. See comment #25 For further explanation.
10	11	4.0 (Unit 08)	Update/Clarification. The "Gasoline Storage Tanks" regulated group has been set up to regulate tanks that store gasoline products, which were listed as insignificant activities in the original CAAPP application. All of the gasoline storage tanks that are listed in section 7.8 of the draft permit have been permanently removed from the facility, with the exception of the Gasoline Tank Wells, which continue to be insignificant activities. Please see the revised insignificant activity identification form (297-CAAPP) along with supporting calculations included in the enclosed Supplement to CAAPP application. Tank A-2 should be added to this section, however. A-2 is a small (24,990 gallon) horizontal fixed roof storage tank located at the river dock. This tank is used as a pressure relief tank, where either gasoline or distillate may be temporarily stored in the event that the product pressure in the river dock loading lines becomes too great and must be relieved. The description of Unit 08 should be changed from "Gasoline Storage Tanks" to "Tank A-2". Please see Section 6 of the enclosed Supplement to CAAPP application and comment #28 for additional information on this tank.
11	15	5.5.1	Update. VOM emissions for the purposes of fees have changed due to the reclassification of storage tanks from floating roof storage tanks able to store gasoline to fixed roof storage tanks able to store distillate and vice versa. Volatile Organic Material (VOM) emissions should be updated from "230.30 tpy" to "212.69 tpy" and Total Regulated Pollutant Emissions should be updated from "282.28 tpy" to "264.67 tpy". Please see the revised CAAPP permit fee form (292-CAAPP) included in the enclosed Supplement to CAAPP application.
12	20-23	7.1	Informational. A construction permit application has been submitted by the Hartford Working Group (IEPA ID 119050AAS) that seeks authorization to replace the existing thermal treatment unit (TTU) with a thermal oxidizer (TO). The TO will be operated by the Hartford Working Group under a separate CAAPP permit and therefore Premcor requests that section 7.1 of this draft permit be removed when the TO has been constructed. It is anticipated that the TO will replace the TTU before or soon after this draft permit (Permit No. 96030082) becomes final.

WHAT IS WEEK?
WHAT ARE THE LOSS TO A2?

The Premcor Refining Group Inc.
Hartford Distribution Center

Comments on the Draft Permit (Permit No. 96030082) -- Public Comment Begins May 27, 2004 and Ends August 12, 2004.

Comment	Page	Condition	Comments & Requested Changes
13	23	7.1.10(b)	Comment. Clarify condition. Please state that this annual report may be submitted with the Annual Emissions Report using the following language. <i>"The Permittee shall submit an annual report of emissions listed in Condition 7.1.6 with supporting calculations. The report shall include a summary of time periods when the thermal treatment unit flame was extinguished. This annual report may be submitted as a supplement to the Permittee's Annual Emissions Report, which is required by Condition 5.7.2."</i>
14	27	7.2.7(c)	Clarification. Include more detail regarding the requirements of 35 IAC 219.429(c), as using the following language. <i>"If the control device used to comply with 35 IAC Section 219.762(a)(1) of this Subpart is a flare, it shall: 1) Be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours as determined by U.S. EPA Method 22. 2) Be operated with a pilot flame present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the flame. 3) Be steam-assisted, air-assisted, or nonassisted. 4) Be used only with the net heating value of the gas being combusted being 11.2 MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted; or with the net heating value of the gas being combusted being 7.45 MJ/scm (200 Btu/scf) or greater if the flare is nonassisted."</i>
15	28	7.2.7(d)(iii)	Correction. In order to maintain continuity of the permit condition number system, Condition 7.2.7(d)(iii) should read: <i>"As an alternative to subsection (d)(ii) of this Section, ..." as opposed to "As an alternative to subsection (d)(2) of this Section, ..."</i>
16	28	7.2.7(d)	Comment - Marine Vessel Vapor Tightness. Include the following compliance option, as provided in 35 IAC 762(b)(3)(B), as Condition 7.2.7(d)(iv): <i>"As an alternative to subsections (d)(ii) and (d)(iii) of this Section, an owner or operator of a marine terminal may obtain documentation as described in 35 IAC 219.770(b) that the marine vessel has been vapor-tightness tested within either the preceeding 12 months or the preceeding 14 months, if the test is being conducted as part of the Coast Guard's reinspection of the vessel required under 46 CFR 31.10-17, using Method 21 of Part 60, Appendix A, incorporated by reference at Section 219.112 of this Part, as described in Section 219.768(b) of this Subpart."</i>
17	28	7.2.7(f)-(g)	Comment. Conditions 7.2.7(f) and 7.2.7(g) should be relabeled 7.2.7(e) and 7.2.7(f), respectively, to maintain continuity of the permit condition number system.
18	30-31	7.2.9(d) 7.2.9(e)	Comments. Condition 7.2.9(d). Hartford does not use the emissions reduction compliance option at the marine terminal. This condition does not apply to Hartford operations and should be removed from the permit. Condition 7.2.9(e). This is an initial compliance certification requirement. The initial certification of existing marine terminal operations was required in 1996. This one-time requirement has already passed, and should be removed from the operating permit.
19	34	7.3.2	Correction. Tank 80-10 is a fixed roof tank, not an external floating roof tank, as identified in the original permit application. Please remove this tank from the list of tanks included in Unit 03, as it will only store fuel oil #2 and will therefore be classified as an insignificant activity under 35 IAC 201.210(a)(11) (Condition 3.1.3). Please see the revised identification form (232-CAAPP - External Floating Roof Tanks) included in the enclosed Supplement to CAAPP application.
20	41	7.4.2	Correction. Tank 20-3 is a fixed roof tank, not an internal floating roof tank, as identified in the original permit application. Please remove this tank from the list of tanks included in Unit 04, as it will only store fuel oil #2 and will therefore be classified as an insignificant activity under 35 IAC 201.210(a)(11) (Condition 3.1.3). Please see the revised identification form (232-CAAPP - Internal Floating Roof Tanks) included in the enclosed Supplement to CAAPP application.
21	41	7.4.2	Correction. Tank T-3-1 is a fixed roof tank, not an internal floating roof tank, as identified in the original permit application. Please remove this tank from the list of tanks included in Unit 04, as it will only store fuel oil #2 and will therefore be classified as an insignificant activity under 35 IAC 201.210(a)(11) (Condition 3.1.3). Please see the revised identification form (232-CAAPP - Internal Floating Roof Tanks) included in the enclosed Supplement to CAAPP application.
22	41	7.4.2	Correction. Tank T-72 is an internal floating roof tank, not a fixed roof tank, as identified in the original permit application. Please add this tank from the list of tanks included in Unit 04. Please see the revised identification form (232-CAAPP - Internal Floating Roof Tanks) included in the enclosed Supplement to CAAPP application.

000944

The Premcor Refining Group Inc.
Hartford Distribution Center

Comments on the Draft Permit (Permit No. 96030082) – Public Comment Begins May 27, 2004 and Ends August 12, 2004.

Comment	Page	Condition	Comments & Requested Changes
✓ 23	58-61	7.5	Informational. The HAP speciation of VOM emissions from the wastewater treatment plant has been updated in the enclosed Supplement to CAAPP. Please see the revised identification form (220-CAAPP - Wastewater Treatment Plant).
✓ 24	60	7.5.5	Comment. The anthracite/sand filters are not air emissions control equipment and therefore should not be subject to periodic inspections in this permit. The filters serve as water filters to remove solids from the waste water stream. Please remove condition 7.5.5.
? 25	62-64	7.6	Comment - Road Dust. Requires an annual calculation of PM/PM10 emissions from road traffic, and includes a requirement to keep a record of the mean vehicle weight (tons) and vehicle miles traveled. Due to the low level of road dust associated with this source, this requirement is unnecessary and overburdensome and should be removed. Condition 5.2.2(a) of this draft permit should be adequate to regulate fugitive dust emissions from roads within the source.
26	65-71	7.7	Comment - River Dock Fugitive VOM Emissions. Please incorporate the requirements of this section into Section 7.2 (River Dock). Many of the requirements of these two sections dealing with fugitive VOM emissions are redundant and should be combined for clarity.
27	72	7.8.1	<p>Comment. Gasoline storage tanks identified in this section, including two (2) contractor gasoline storage tanks, portable 300 gallon storage tanks, and the gasoline tank west of the main maintenance shop are no longer owned or operated at the Hartford Distribution Center, and they should be removed from this permit.</p> <p>The units identified as gasoline tank wells in the draft permit are part of remediation operations at the Hartford Distribution Center. They consist of 10 relatively small (500 gallon) double-walled containers that are commonly referred to as "Lube Cubes". The purpose of the each Lube Cube is to hold hydrocarbons (including gasoline) pumped from vertical recovery wells until the contents can be collected by a vacuum truck and removed from the facility. Emissions of both VOM and HAP from these tanks are small, so that they should be classified as insignificant under 35 IAC 201.211(a). Please see the revised insignificant activity identification form (297-CAAPP) along with supporting calculations included in the enclosed Supplement to CAAPP application.</p>
28	72-75	7.8	<p>Addition. Tank A-2 should be added to this section. A-2 is a small (24,990 gallon) horizontal storage tank located at the river dock. This tank is used as a pressure relief tank, where either gasoline or distillate may be temporarily stored in the event that the product pressure in the river dock loading lines becomes too great and must be relieved. Because of its size, the only control requirement necessary for the operation of this tank is submerged fill, as required by 35 IAC 219.122(b).</p> <p><i>"No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with Section 219.108 of this Part, or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 219.121(b)(2)."</i></p> <p>All references to "affected Tank Wells" in this Section should be changed to "affected storage tank" to reflect this change.</p>
NO 29	73	7.8.6	<p>Comment. The second paragraph of this condition is entirely informational, does not contain any permit requirements, and should therefore be removed from the permit. This condition should read:</p> <p><i>"7.8.6 Emission Limitations</i> <i>There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit."</i></p>
30	78	8.6.1	Clarification. Include more detail regarding the specific types of monitoring that must be included in this report. For example, does monitoring of the river dock flare and TTU only need to be included, or does this report also cover leak inspections and tank inspections?

000945

Premcor Alsip Distribution Center
3600 West 131st Street
Alsip, Illinois 60803-1535



Premier People,
Products and Services

August 26, 2004

Mr. Sunil Suthar
Illinois Environmental Protection Agency
Division of Air Pollution Control
1021 North Grand Avenue East
Springfield, Illinois 62794

Re: *Response to American Bottom Conservancy Letter to IEPA (Dated 8/12/2004)*
Concerning Premcor Refining Group Hartford Distribution Center
Draft CAAPP Permit #96030082

Dear Mr. Suthar:

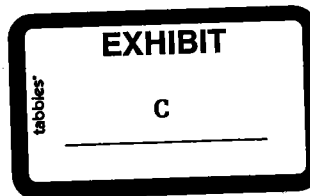
This letter is intended to answer questions concerning The Premcor Refining Group Inc's (Premcor) draft Title V operating permit for the Hartford Distribution Center (PHDC) posed by the American Bottom Conservancy (ABC) in a letter (dated 8/12/04) addressed to Mr. Charles Matoesian of the Illinois Environmental Protection Agency (IEPA). The ABC letter was electronically mailed to Mr. Tony Schroeder of Trinity Consultants by IEPA on August 17, 2004. With respect to questions where supporting information has already been presented to IEPA or questions that are better answered by IEPA directly, references have been included to indicate where this information regarding answers to these questions may best be found.

ABC comment #1:

For example, p. 38-39 of Hearing Transcript: ABC provided a letter from Clark (now Premcor) to the Agency, which we obtained through a Freedom of Information [Act] request, on tankage. The letter appeared to list tanks not in the permit. Mr. Suthar was going to check and provide us with the numbers and to make sure that tanks not included in the title V permit are no longer in use.

Premcor must provide the Agency (and the public) a complete, detailed list of the tanks permitted in this permit, a list of all tanks that are still owned by Premcor, including a list of those that have been retired, and a list of tanks owned by Premcor that may be used by others. The list must also detail not only what can be stored in the tank, but also what cannot.

Premcor response:



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000961

Mr. Sunil Suthar – August 26, 2004
Page 2 of 7

A complete, up-to-date list of tanks owned and operated by Premcor at PHDC has been provided to IEPA as a part of the Supplement to CAAPP Application that was submitted by Premcor in July 2004. The Supplement also includes a list of materials associated with each tank.

Following is a summary of tanks included in Premcor's Supplement to CAAPP Application:

- External Floating Roof Tanks – 120-1, 120-2, 120-3, 120-4, 120-5, 120-8, 80-4, 80-5, 80-11, 20-8, 10-20, and 5-10.
- Internal Floating Roof Tanks – 120-9, 10-5, 10-7, 10-10, T-72.
- Significant Fixed Roof Tanks – A-2.
- Insignificant Fixed Roof Tanks – 120-7, 120-10, 120-11, T-3-1, 80-10, 20-3, and T-57.

ABC may obtain the Supplement through a Freedom of Information Act (FOIA) request or by any other means that IEPA deems appropriate.

ABC comment #2:

We also note that as we were leaving the building after the hearing, Steve Mulkey, the Premcor representative, indicated that the map provided by IEPA at the hearing was inaccurate. Please provide both the record and us a diagram that is accurate and up-to-date.

Premcor response:

The map provided as a part of Premcor's Revised CAAPP Operating Permit Application (submitted September 2003) is accurate and up-to-date.

ABC comment #3:

P. 42, 43: We asked which emission sources will have a CAM plan. Mr. Suthar said he would look at their calculations of potential to emit and get back to us. We do not yet have that information and would like to comment on it.

Premcor response:

Facilities that submitted a complete Title V permit application prior to April 20, 1998 are required to determine CAM applicability and submit information required under the CAM rule (40 CFR Part 64) "as part of the application for renewal of a Part 70 [Title V] permit." (40 CFR 64.5(a)(3)). CAM applicability for individual emission units at PHDC will be determined and addressed as a part of Premcor's first Title V permit renewal application, which must be submitted within no later than 9 and no sooner than 12 months prior to permit expiration. (Draft Permit

000962

Mr. Sunil Suthar – August 26, 2004
Page 3 of 7

Condition 9.14.)

Condition 5.2.7 of PHDC's draft CAAPP permit incorrectly states that Premcor's original CAAPP application was not submitted or deemed complete by April 20, 1998. IEPA received Premcor's original application for the Hartford facility on March 7, 1996 and issued an application completeness determination to Premcor on March 29, 1996. As such, Condition 5.2.7 of PHDC's draft CAAPP operating permit should be corrected by IEPA to read as follows,

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

Premcor requests that this condition be changed in the draft CAAPP operating permit prior to submittal for U.S. EPA review.

ABC comment #4:

Pp. 26-29—Details of Monitoring program not yet provided. We need details of the monitoring program and the Agency must include language in the permit to reflect that it has already been developed. We also ask that the permit include periodic updating of the program.

Premcor response:

The fugitive leak monitoring plan required by 35 IAC 219.446 is already in place at PHDC. The details of the requirements of the monitoring plan are included in Condition 7.7.8 of the draft permit. Decisions regarding updates to wording in the permit are the responsibility of IEPA, but must reflect regulatory guidelines.

ABC comment #5:

P. 71-73 Hartford Village Trustee Don Jacoby asked about underground gasoline storage wells. Premcor's Mr. Mulkey was going to check to see if there were any underground tanks. We have not heard the answer to that question. The permit indicates a "contractor gasoline storage tank, gasoline, ...gasoline tank wells...."

Which contractor? Is it covered in this permit? Do the wells belong to Premcor? What is underground? Are they covered by this permit? Given the history of leaking and contamination at this site—and given that there is no Agency inspecting the tanks, nothing underground should be allowed to continue to operate.

000963

Mr. Sunil Suthar – August 26, 2004
Page 4 of 7

Premcor response:

The "gasoline tank wells" that were referenced in the latest version of PHDC's draft CAAPP permit (dated May 27, 2004) are the "Lube Cubes" that are described in the Supplement to CAAPP Application that was submitted to IEPA in July 2004.

Additionally, there are no contractor gasoline storage tanks located at PHDC, as reflected in PHDC's Supplement to CAAPP Application.

ABC comment #6:

p. 16–Premcor Environmental Remediation Mgr. Steve Mulkey: "We typically employ 15-20 full-time contractors at the site."

What do the contractors do? Is everything they do covered by this permit? Is there any other permit that covers what they do? The permit must assure that all activities undertaken by Premcor and its contractors that are covered by applicable requirements are included in this permit.

Premcor response:

Contractors that work on-site at PHDC include pipe fitters, laborers, secretarial help, and personnel who perform basic mechanical and electrical tasks. These contractors do not perform tasks that would be characterized as "significant" activities that are not already listed in PHDC's CAAPP application.

ABC comment #7:

We would like to submit for the record answers to other questions we asked of Premcor's environmental remediation manager, Steve Mulkey, who called us after the hearing with answers. We appreciate Mr. Mulkey's prompt attention to our requests. Mr. Mulkey indicated that none of the tanks currently contain MTBE and should not in the future. We would like this to be written into the permit, because MTBE would raise the amount of VOM and HAPS emissions. It could also exacerbate and accelerate the groundwater contamination.

Premcor response:

As of July 2004, MTBE has been banned in Illinois with the exception of *de minimus* amounts in gasoline product. The Premcor refineries that supply, in large part, the Hartford Distribution Center, do not use MTBE.

ABC comment #8:

Mr. Sunil Suthar – August 26, 2004
Page 5 of 7

P. 70: In view of the fact that the Hartford area has a pool of petroleum/gasoline products floating in the groundwater, whose fumes migrate into the homes of Hartford residents and have caused explosions—AND, that no state or federal agency is inspecting the tanks that are the subject of this permit, we asked Premcor if they would share the API tank inspection reports with us. Mr. Mulkey asked, but reported in his phone call to us that the company declined, because of pending lawsuits. Surely, there must be some action the Agency or EPA could take that would allow them to inspect these tanks. At a minimum, the fact that Premcor did not disclose the tank inspection reports should be noted in the permit and it should be made clear that the permit shield does not cover any tank breakdowns and malfunctions attributable to structural problems.

Premcor response:

As stated previously, the CAAPP permit application is complete and contains all of the relevant information on the tanks for purposes of the permit at issue. Premcor follows industry standard API 653 for tank integrity. These records are not relevant to a CAAPP permit.

ABC comment #9:

We have requested but not yet received the latest annual emissions report for the company, and specifically for the tanks, and are therefore unable to comment. As soon as we receive the report, we will send our comment.

Premcor response:

Premcor submitted its Annual Emissions Report for the 2003 reporting year to IEPA in April of 2004. This information may be obtained through a FOIA request or by other means that IEPA deems appropriate.

ABC comment #10:

The permit needs to require Premcor to USE the submerged loading pipe, it is not enough to say that they have one.

Premcor response:

The language in CAAPP permits that require that affected tanks be equipped with a permanent submerged loading pipe is taken from the regulations of the Illinois Administrative Code. Modifications to the language of this permit requirement are under the discretion of IEPA.

ABC comment #11:

We are also extremely unclear about which company and/or entity uses each of the wastewater treatment facilities with regard to Premcor, Conoco, Roxana, etc. Please provide us a

000965

Mr. Sunil Suthar – August 26, 2004
Page 6 of 7

clarification. It was indicated at the hearing that Premcor has an NPDES permit for the facility. Please provide us with the permit number and expiration date.

Premcor response:

Premcor's wastewater treatment facilities are used to treat storm water and non-rain event water, including:

- Groundwater,
- Tank bottom water,
- Tank cleaning water,
- Hydrostatic test water,
- Boiler and cooling tower blowdown water (from Conoco-Phillips); and
- Small miscellaneous sources including water from pump cleanings, truck washings, etc.

These uses are the same that are stated in PHDC's revised CAAPP Operating Permit Application (submitted September 2003) and in PHDC's Supplement to CAAPP Application (submitted July 2004).

ABC comment #12:

The following appears not to be included in this permit. Why is it not? We request that it be added.

5.2.3 No person shall use any single or multiple compartment effluent water separator which receives effluent water containing 757 l/day (200 gal/day) or more of organic material from any equipment processing, refining, treating, storing or handling organic material unless such effluent water separator is equipped with air pollution control equipment capable of reducing by 85 percent or more the uncontrolled organic material emitted to the atmosphere. Exception: If no odor nuisance exists the limitations of this subsection shall not apply if the vapor pressure of the organic material is below 17.24 kPa (2.5 psia) at 294.3°K (70°F) [35 IAC 218.141(a)].

Premcor response:

The Hartford Distribution Center is not subject to 35 IAC 218.141(a), as it is only applicable to stationary sources located within the Chicago Nonattainment Area. The analogous requirement for the Metro East area is 35 IAC 219.141(a), for which applicability has already been addressed in the draft CAAPP permit. Condition 7.5.4(d) (Non-Applicability of Regulations of Concern) of PHDC's draft CAAPP permit states that the affected wastewater treatment operations at PHDC do not meet the applicability threshold (200 gal/day of organic material) for this requirement, as listed in 35 IAC 219.141(a) and determined from Premcor's Revised CAAPP Permit Application (September 2003) and Supplement to CAAPP Application (July 2004).

ABC comment #13:

000966

Mr. Sunil Suthar – August 26, 2004
Page 7 of 7

We are concerned that Premcor is not required to keep a detailed record of HAPS emissions. We also request this condition, taken from another permit, to be added:

5.6.2 Records for VOM and HAP Emissions The Permittee shall maintain records of the following items to verify that the source is not a major source for HAP emissions and therefore not subject to 40 CFR 63Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) and to quantify annual VOM emissions, so as to demonstrate compliance with the limits in Condition 5.5.a. 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; and FINAL DRAFT/PROPOSED CAAPP RENEWAL PERMIT Equilon Enterprises, LLC I.D. No.: 197810AAA Application No.: 95060055 March 26, 2004.

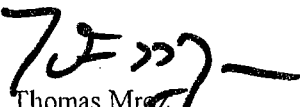
Premcor response:

Condition 5.7.3 of PHDC's draft CAAPP permit requires that Premcor report the annual individual and combined HAP emissions from the facility on a 12-month rolling basis with the facility's Annual Emissions Report. In order to complete these reports, detailed records of HAP emissions must be retained. Thus, adding another requirement to the permit that states that Premcor must keep records of HAP emissions is redundant.

We hope that the above responses will help to clear up any remaining questions concerning PHDC's draft CAAPP operating permit. We are particularly concerned, in response to ABC comment #3, that Condition 5.2.7 is revised to accurately reflect the situation for PHDC. If IEPA has any questions regarding these responses, please contact me Becky Malloy (618) 254-7301 ext. 261 or Mr. Tony Schroeder of Trinity Consultants at (630) 574-9400.

Sincerely,

THE PREMCOR REFINING GROUP INC.



Thomas Mraz
Environmental, Health and Safety Engineer

cc: Mr. Brad Frost, IEPA
Mr. Tony Schroeder, Trinity Consultants

000967



John Tenison, PG – HSE Manager
Logistics Operations and Development

Phone: 210/345-4665 • Fax: 210/370-4665
E-mail: john.tenison@valero.com

April 3, 2006

CERTIFIED MAIL
NO. 7005-1160-0001-8565-6049
RETURN RECEIPT REQUESTED

Mr. Sunil Suthar
Illinois Environmental Protection Agency
Division of Air Pollution Control – Permit Section
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

**RE: Updated List of Storage Tanks
The Premcor Refining Group Inc.
Premcor Hartford Distribution Center
Source ID: 119050AAA**

Dear Mr. Suthar:

This letter is in response to your request via email on March 13, 2006 to Mr. Tony Schroeder of Trinity Consultants for confirmation of the storage tanks at the Premcor Refining Group Inc.'s (Premcor) Hartford Distribution Center (PHDC). Table 1 contains a list of tanks at PHDC that Premcor requests be included in the pending Clean Air Act Permit Program (CAAPP) permit. The tanks listed in Table 1 are identical to those submitted to the Illinois Environmental Protection Agency (IEPA) in a CAAPP Operating Permit Application Supplement in July 2004.

TABLE 1. CURRENT PRODUCT STORAGE TANKS

Tank ID	Capacity (barrels)	Roof Type	Tank ID	Capacity (barrels)	Roof Type
5-10	5,000	External Floating Roof	120-2	120,000	External Floating Roof
10-5	10,000	Internal Floating Roof	120-3	120,000	External Floating Roof
10-7	10,000	Internal Floating Roof	120-4	120,000	External Floating Roof
10-10	10,000	Internal Floating Roof	120-5	120,000	External Floating Roof
10-20	10,000	External Floating Roof	120-7	120,000	Cone Roof
20-3	20,000	Cone Roof	120-8	120,000	External Floating Roof
20-8	20,000	External Floating Roof	120-9	120,000	Internal Floating Roof
80-4	80,000	External Floating Roof	120-10	120,000	Cone Roof
80-5	80,000	External Floating Roof	120-11	120,000	Cone Roof
80-10	80,000	Cone Roof	A-2	595	Horizontal Fixed Roof
80-11	80,000	External Floating Roof	T-3-1	3,000	Cone Roof
120-1	120,000	External Floating Roof	T-72	1,500	Internal Floating Roof

EXHIBIT

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IEPA - DAPC - SPFLD

Mr. Sunil Suthar

Page 2

April 3, 2006

Several tanks that were listed on the insignificant activities form (297-CAAPP) in the July 2004 CAAPP Operating Permit Application Supplement have been demolished or are planned to be demolished, however. These tanks and their demolition status are listed in Table 2 below.

TABLE 2. TANKS REMOVED OR TO BE REMOVED

Tank ID	Description	Demolition Status
T-57	Diesel Storage	Scheduled for Demolition
T-144	Spent Caustic Storage	Demolished
No ID	Sodium Hypochloride Storage	Demolished
No ID	Caustic Storage	Demolished

There are also currently several waste water storage tanks in existence at the terminal. These tanks have the following designations: T-66, T-67, T-68, T-69, T-70, T-71, DAF, 161, and 162. These tanks are properly identified in Section 7.5 of the draft CAAPP permit (#96030082) as portions of the wastewater treatment system.

If you have any questions regarding this letter, please do not hesitate to call me at (210) 345-4665 or Mr. Tony Schroeder of Trinity Consultants at (630) 574-9400.

Sincerely,



John Tenison

000997

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

**PROJECT SUMMARY for the
DRAFT CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT**

The Premcor Refining Group, Inc. -- Hartford Distribution Center
201 East Hawthorne
Hartford, Illinois 62048

Illinois EPA ID Number: 119050AAA

Application Number: 96030082

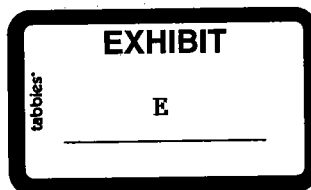
Application Type: Initial Permit

Start of Public Comment Period: May 27, 2004

Close of Public Comment Period: August 12, 2004

Permit Engineer/Technical Contact: Sunil Suthar, 217/782-2113

Community Relations/Comments Contact: Brad Frost, 217/782-7027



001000

I. INTRODUCTION

This source applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation on March 7, 1996. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in this CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA. The Premcor Refining Group, Inc. – Hartford Distribution Center is located at 201 East Hawthorne, Hartford, Illinois. The source is engaged in petroleum storage and distribution operations.

The facility was formerly Clark Refining and is now owned and operated by Premcor Refining Group. All refinery operations are shutdown. This facility consists only of storage and distribution operations.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed/Modified	Emission Control Equipment
Unit 01	Vapor Control System: Control Boreholes, Knock Out Drum, Vacuum Blowers (75 Hp/Electric)	1/92	Thermal Treatment Unit (Enclosed Flare)
Unit 02	Marine Vessel Loading	1981 ^a	Vapor Recovery Unit and Flare
Unit 03	External Floating Roof Tanks: 120-1 120-2 120-3 120-4 120-5 120-8 80-4 80-5 80-10 80-11 20-8 10-20 5-10	 1947 1947 1953 1953 1953 1957 1945 1949 1953 1953 1960 1961 1954	Floating Roof, Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
Unit.04	Internal Floating Roof Tanks: Group 1 Tanks ^b (Subject to 40 CFR 60, Subpart Kb): 20-3/840,000 Gal 10-10/420,000 Gal Group 2 Tanks (Not Subject to NSPS): 10-5/420,000 Gal 10-7/420,000 Gal T-3-1/126,000 Gal Group 3 ^c (Subject to 40 CFR 60, Subpart K) Tank: 120-9/5,040,000 Gal	1948/1990 1941/1994 1941 1941 1956 1975	Internal Floating Roof, Submerged Loading

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Emission Unit	Description	Date Constructed/Modified	Emission Control Equipment
Unit 05	Wastewater Treatment Plant: Entry Points, Two (2) Equalization Tanks, Diffused Air Flotation (DAF) Unit, Two (2) Aeration Basins, Two (2) Clarifiers, Anthracite/Sand Filter.	1973/1994 ^d	Anthracite/Sand Filters
Unit 06	Fugitive Emissions from Paved and Unpaved Roads	---	---
Unit 07	Fugitive VOM Emissions from Valves, Flanges, Seals, and Miscellaneous Components	Not Available	Leak Detection and Repair Program
Unit 08	Gasoline Storage Tanks	Pre-1990	None
Unit 09	Lube Cubes nineteen 500-gallon double walled containers	June 6, 2005	None
Unit 10	Storage and Barge Loading of Ethanol and Toluene	09/2004	river dock vapor transfer/flare system
Unit 11	Soil Vapor Extraction System: Blowers, Ancillary Equipment	1/2006	Thermal Oxidizer

- a Refurbished in 1981. A new platform was constructed, a new pipeline was installed to the river dock. The loading berth was reconditioned and all new piping and loading arms installed.
- b Subject to 40 CFR 60, Subpart Kb
- c Subject to 40 CFR 60, Subpart K
- d Installation of two (2) equalization tanks

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions. For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	230.30
Sulfur Dioxide (SO ₂)	4.34
Particulate Matter (PM)	12.08
Nitrogen Oxides (NO _x)	35.56
HAP, not included in VOM or PM	----
Total	282.28

001002

Reported Annual Emissions			
Pollutant	2005	2004	2003
CO	0.30	2.32	8.10
NOx	0.06	0.43	1.49
PM	0.24	1.95	2.01
SO2	0.31	2.51	2.45
VOM	75.11	100.11	114.19
(top HAP)	0.37	0.40	0.53

This permit is a combined Title I/CAAPP permit that contains terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - Federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N.

EXISTING PERMITS	
04070052	STORAGE & LOADING (Section 7.10.6)
05030053	LUBE CUBES (Section 7.9.6)
05120034	SOIL VAPOR EXTRACTION SYSTEM (Section 7.11.6)
92050052	HARTFORD VAPOR CONTROL (Section 7.1.6 & 7.1.7)

Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois. All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement. All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

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V. PROPOSED CAAPP PERMIT

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

Non-Applicability Statements

As CAAPP permits are intended to list applicable regulatory requirements, it is inherent that they may also identify certain requirements that are not applicable. Non-applicability determinations or provisions are found in Conditions "7.x.5" of the permit. These conditions include both the relevant regulatory provision or finding and the underlying basis for the provision or finding. At one end of the spectrum, these conditions merely reflect applicable regulatory language and are included in the CAAPP permit for clarity, especially as CAAPP permits are prepared to be understandable by individuals who are unfamiliar with the details of air pollution control regulations. At the other end of the spectrum, these provisions entail the exercise of the Illinois EPA's technical judgment and knowledge of the historical implementation of air pollution rules in Illinois.

Unit 01: Vapor Control System

None

Unit 02: River Dock (Marine Vessel Loading):

35 IAC 219.122, which requires a submerged loading pipe when loading a volatile organic liquid (VOL) with a vapor pressure greater than 2.5 psia, because the rule is only relevant to loading operations for railroad tank car, tank truck, trailer, or stationary tank; the affected marine vessel loading operation is only engaged in the loading of marine vessels.

35 Ill. Adm. Code 219.120, Control Requirements for Storage Containers of VOL per 35 Ill. Adm. Code 219.119, which states that limitations of 35 Ill. Adm. Code 219.120 do not apply to vessels permanently attached to trucks, railcars, barges, or ships [35 Ill. Adm. Code 219.119(d)].

40 CFR 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals, since the affected marine vessel loading does not deliver liquid product into gasoline tank trucks as required for applicability.

40 CFR 63, Subpart Y, National Emission Standards for Marine Tank Vessel Tank Loading Operations, since the facility has opted to accept a limit for total loading of high-vapor pressure materials to marine vessels to no greater than 9.5 million barrels per year; the rule requires 10 million barrels or 200 million barrels per year for applicability.

Unit 03: External Floating Roof Storage Tanks:

None

Unit 04: Internal Floating Roof Storage Tanks:

Groups 1 tanks and 120-9 tank are not subject to 35 IAC 219.123 when in VPL service because they are subject to a NSPS [35 IAC 219.123(a)(5)]. Though these tanks are subject to 35 IAC 219.121, compliance with Subpart Ka or Kb is deemed to be more stringent and will demonstrate compliance with 35 IAC 219.121

35 IAC 219.124 because the tanks are considered internal floating roof tanks.

40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected storage tanks uses a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

Unit 05: Wastewater Treatment System and Thermal Oxidizer:

The wastewater treatment system is not subject to the NSPS for VOC Emissions From Petroleum Refinery Wastewater Systems, 40 CFR 60 Subpart QQQ, because the affected wastewater treatment operations are not located at a petroleum refinery.

The wastewater treatment system is not subject to 35 IAC 219.443, Wastewater (Oil/Water) Separator, because the affected wastewater treatment operations are not located at a petroleum refinery.

The wastewater treatment system is not subject to 35 IAC 219 Subpart TT, Other Emission Units, because the affected wastewater treatment operations do not meet the applicability of 35 IAC 219.980(a). In particular, the affected wastewater treatment operations have maximum theoretical emissions of VOM that are less than 90.7 Mg (100 tons) per year.

The wastewater treatment system is not subject to 35 IAC 219.141(a), as applicability requires use any single or multiple compartment effluent water separator which receives effluent water containing 757 l/day (200 gal/day) or more of organic material from any equipment processing, refining, treating, storing or handling organic material; the affected wastewater treatment operations do not meet this threshold.

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Unit 07: Fugitive VOM Emissions from Leaking River Dock Flare Components

Fugitive VOM Emissions from Leaking River Dock Flare Components are not subject to 40 CFR 60, Subpart KKK, Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants since the facility is actually classified as a Petroleum Bulk Storage and Loading facility.

Fugitive VOM Emissions from Leaking River Dock Flare Components are not subject to 40 CFR 60 Subpart LLL, Standards of Performance for Onshore Natural Gas Processing since the facility is classified as a Petroleum Bulk Storage and Loading facility.

Unit 08: Gasoline Storage Wells

The tank wells are not subject to the NSPS for volatile organic liquid storage vessels (including petroleum liquid storage vessels) for which construction, reconstruction, or modification commenced after July 23, 1984, 40 CFR 60 Subpart Kb, because the affected tank well was constructed prior to 1984.

The tank wells are not subject to the requirements of 35 IAC 219.123, petroleum liquid storage tanks, pursuant to 35 IAC 215.123(a)(2), which exempts storage tanks with a capacity less than 151.42 m³.

Unit 09: Lube Cubes

The Lube Cubes are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected Lube Cubes do not use an add-on control device to achieve compliance with an emission limitation or standard.

Unit 11: Soil Vapor Extraction System

This unit is not subject to the 40 CFR Part 63 Subpart GGGGG: National Emission Standards for Hazardous Air Pollutants: Site Remediation because the source is not a major source of HAP [40 CFR 63.7881(a)].

Non-applicability determinations also serve to shield a source from the requirement that is identified as being non-applicable, at least until the circumstances of the subject emission unit change. This is because a non-applicability determination provides the permit shield when the Illinois EPA, in acting on the application, has determined that other requirements specifically identified are not applicable to a source and this determination (or a concise summary thereof) is included in this permit, as provided by Section 39.5(7)(j) of the Environmental Protection Act. As USEPA is aware, the availability of permit shields in Illinois's CAAPP permits is explicitly provided for and required by Section 504(f)(2) of the Clean Air Act. The Illinois EPA is obligated to include provisions in a CAAPP permit that provide for permit shields when requested by an applicant. The non-applicability statements are also used as a mechanism for permit streamlining. Accordingly, the regulatory requirements for which the CAAPP permit is silent and the Illinois EPA has refrained from making non-applicability determinations are also important when considering this subject.

001006

Permit Streamlining Discussion

Ill Adm Code 219.121 requires that containers of VPL to ensure that the reservoir or other container is a pressure tank or the container has either a floating roof or a vapor recovery system with 85 % collection capability.

In comparison, 40 CFR 60, Subpart Ka and Kb requires that the reservoir or container have any of the following: an external floating roof (A fixed roof in combination with an internal floating roof/external floating roof for Kb), a fixed roof with an internal floating type cover equipped with a continuous closure device between the tank wall and the cover edge, A vapor recovery system which collects all VOC vapors and gases discharged from the storage vessel, and a vapor return or disposal system which is designed to process such VOC vapors and gases so as to reduce their emission to the atmosphere by at least 95 percent by weight. Note that the NSPS for tanks requires a 95 % reduction (by weight) of VOC in the atmosphere thru a vapor recovery system, while Ill. Adm Code 219.121 requires a 85 % collection capability only.

Periodic Monitoring

The elements of periodic monitoring for specific emission units are summarized in the CAAPP permit itself, in Conditions 7.x.12. As a general matter, the permits include a set of work practice and inspection requirements, testing requirements, monitoring requirements, recordkeeping requirements, and reporting requirements for each significant emission unit to address compliance with the applicable requirements that control emissions from the unit. To the extent that such requirements were lacking from applicable regulations or were considered insufficient, new or additional requirements were imposed. The result is sets of pollutant-specific periodic monitoring provisions for the various categories of units that the Illinois EPA has determined are both necessary and reasonable to address compliance with the emission control requirements that apply to such units.

Generally speaking, the majority of the periodic monitoring for this facility is already developed through the various federal regulations that apply to the facility which encompasses predominantly recordkeeping and reporting. However, one area where periodic monitoring had to be put into place was for the River Dock VOM emissions.

Periodic monitoring is required for the Fugitive VOM Emissions from Leaking River Dock Flare Components. Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC Section 219.446 which provides that the owner or operator of a petroleum refinery shall prepare a monitoring program plan per which contains, at a minimum:

- a. An identification of all refinery components and the period in which each will be monitored pursuant to Section 35 IAC 219.447 [35 IAC Section 219.446(a)];
- b. The format for the monitoring log required by 35 IAC Section 219.448 of this Part [35 IAC Section 219.446(b)];

001007

- c. A description of the monitoring equipment to be used pursuant to 35 IAC Section 219.447 of this Part; and [35 IAC Section 219.446(c)]
- d. A description of the methods to be used to identify all pipeline valves, pressure relief valves in gaseous service and all leaking components such that they are obvious to both refinery personnel performing monitoring and Agency personnel performing inspections [35 IAC Section 219.446(d)].

Prompt Reporting

Prompt reporting of deviations is critical in order to have timely notice of deviations and the opportunity to respond, if necessary. The effectiveness of the permit depends upon, among other important elements, timely and accurate reporting. The Illinois EPA, USEPA and the public rely on timely and accurate reports submitted by the permittee to measure compliance and to direct investigation and follow-up activities. Prompt reporting is evidence of a permittee's good faith in disclosing deviations and describing the steps taken to return to compliance and prevent similar incidents.

Any occurrence that results in an excursion from any emission limitation, operating condition, or work practice standard as specified in this CAAPP permit is a deviation subject to prompt reporting. Additionally, any failure to comply with any permit term or condition is a deviation of that permit term or condition and must be reported to the Illinois EPA as a permit deviation. The deviation may or may not be a violation of an emission limitation or standard. A permit deviation can exist even though other indicators of compliance suggest that no emissions violation or exceedance has occurred. Reporting permit deviations does not necessarily result in enforcement action. The Illinois EPA has the discretion to take enforcement action for permit deviations that may or may not constitute an emission limitation or standard or the like, as necessary and appropriate.

Section 39.5(7)(f)(ii) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(B), requires prompt reporting of deviations from the permit requirements. The permitting authority (in this case, Illinois EPA) has the discretion to define "prompt" in relation to the degree and type of deviation likely to occur. Furthermore, Section 39.5(7)(f)(i) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(A) requires that monitoring reports must be submitted at least every 6 months. Therefore, USEPA generally considers anything less than 6 months to be "prompt" as long as the selected time frame is justified appropriately (60 Fed. Reg. 36083, 36086 (July 13, 1995)).

The USEPA has stated that, for purposes of administrative efficiency and clarity, it is acceptable to define prompt in each individual permit. *Id.* The Illinois EPA has elected to follow this approach and defines prompt reporting on a permit by permit basis. In instances where the underlying applicable requirement contains "prompt" reporting, this frequency or a shorter frequency of reporting is the required timeframe used in this permit. Where the underlying applicable requirement fails to explicitly set forth the timeframe for reporting deviations, the Illinois EPA has developed a structured manner to determine the reporting approach used in this permit.

The Illinois EPA generally uses a time frame of 30 days to define prompt reporting of most deviations. Also, for certain permit conditions in individual permits, the Illinois EPA may require an alternate timeframe that is less than 30 days if the permit requirement justifies a shorter reporting time period. Under certain circumstances, EPA may establish a deviation reporting period longer than 30 days, but, in no event exceeding 6 months. Where it has established a deviation reporting period other than 30 days in an individual permit (specifically Section 7.x.10), the Illinois EPA has explained the reason for the alternative timeframe. (See Attachment 2 of this Project Summary.)

The timing for certain deviation reporting may be different when a source or emission unit at a source warrants reporting to address operation, independent of the occurrence of any deviations. This is the case for a source that is required to perform continuous monitoring for the emission unit, for which quarterly or semi-annual "monitoring" reports are appropriate. Where appropriate, reporting of deviations has generally been combined in, or coordinated with these quarterly or semi-annual reports, so that the overall performance of the plant can be reviewed in a comprehensive fashion. This will allow a more effective and efficient review of the overall performance of the source by the Illinois EPA and other interested parties, as well as by the source itself.

At the same time, there are certain deviations for which quicker reporting is appropriate. These are deviations for which individual attention or concern may be warranted by the Illinois EPA, USEPA, and other interested parties. Under this scenario, emphasis has been placed primarily on deviations that could represent substantial violations of applicable emission standards or lapses in control measures at the source. For these purposes, depending on the deviation, immediate notification may be required and preceded by a follow-up report submitted within 15 days, during which time the source may further assess the deviation and prepare its detailed plan of corrective action.

In determining the timeframe for prompt reporting, the Illinois EPA assesses a variety of criteria such as:

- historical ability to remain in continued compliance,
- level of public interest in a specific pollutant and/or source,
- seriousness of the deviation and potential to cause harm,
- importance of applicable requirement to achieving environmental goals,
- designation of the area (i.e., non-attainment or attainment),
- consistency among industry type and category,
- frequency of required continuous monitoring reports (i.e., quarterly),
- type of monitoring (inspection, emissions, operational, etc.), and
- air pollution control device type and operation

These prompt reporting decisions reflect the Illinois EPA's consideration of the possible nature of deviations by different emission units and the responses that might be required or taken for those different types of deviations. As a consequence, the conditions for different emission units may identify types of deviations which include but are not

limited to: 1) Immediate (or very quick) notification; 2) Notification within 30 days as the standard; or 3) Notification with regular quarterly or semi-annual monitoring reports.

The Illinois EPA's decision to use the above stated prompt reporting approach for deviations as it pertains to establishing a shorter timeframe in certain circumstances reflects the criteria discussed as well as USEPA guidance on the topic.

- 40 CFR 71.6(a)(3)(iii)(B) specifies that certain potentially serious deviations must be reported within 24 or 48 hours, but provides for semi-annual reporting of other deviations. (Serious or severe consequences)
- FR Vol. 60, No. 134, July 13, 1995, pg. 36086 states that prompt should generally be defined as requiring reporting within two to ten days of the deviation, but longer time periods may be acceptable for a source with a low level of excess emissions. (intermediate consequences)
- Policy Statement typically referred to as the "Audit Policy" published by the USEPA defines prompt disclosure to be within 21 days of discovery. (Standard for most "pollutant limiting" related conditions)
- Responses to various States by USEPA regarding other States' definition of prompt.

As a result, the Illinois EPA's approach to prompt reporting for deviations as discussed herein is consistent with the requirements of 39.5(7)(f)(ii) of the Act as well as 40 CFR part 70 and the CAA. This reporting arrangement is designed so that the source will appropriately notify the Illinois EPA of those events that might warrant individual attention. The timing for these event-specific notifications is necessary and appropriate as it gives the source enough time to conduct a thorough investigation into the causes of an event, collecting any necessary data, and to develop preventative measures, to reduce the likelihood of similar events, all of which must be addressed in the notification for the deviation.

VI. REQUEST FOR COMMENTS

After review of Premcor's application, the Illinois EPA made a preliminary determination that the application met the standards for issuance of a CAAPP permit. The Illinois EPA prepared a draft permit for public review. A comment period was opened on October 10, 2003 requesting public comments. During the public comment period a request for hearing was received.

Notification of the hearing and comment period appeared in the Alton Telegraph on May 27, 2004, June 3, 2004, and June 10, 2004. A hearing was held on July 13, 2004 at the Village of Hartford Recreational Building, 715 North Delmar in Hartford. The comment period closed on August 12, 2004.

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VII. RESPONSE TO COMMENTS

General Oversight / Compliance

Once issued, the Title V permit will be the tool to determine compliance of the facility with environmental regulations. Enforcement comes through inspections of the facility and reporting requirements.

At the next scheduled inspection, the inspector will verify that the facility is in compliance with the CAAPP. Typically, scheduled inspections are performed by Agency field staff as part of a work plan and generally are not unannounced inspections. This is because the Illinois EPA may want to make sure that specific staff are present, that specific records are readily available and that specific processes will be on-line or running on that day. However, if the Illinois EPA receives a complaint or otherwise believes that the facility may be operating out of compliance, the resulting inspection typically will not be an announced inspection.

As discussed in Section V, reporting can be prompt or as part of scheduled reporting activities. The company is required to promptly report upset situations to IEPA which are then looked into by Illinois EPA compliance and inspection staff. Regular reports that are submitted by the company are also reviewed by IEPA compliance staff to make sure that the facility is not out of compliance.

The data that is reported is typically technical data, such as temperature of a boiler, fuel throughput, opacity data from a monitor, etc., which is easily verifiable. The Illinois EPA is able to more adequately assess the compliance status of the facility and gauge the accuracy through redundant reporting mechanisms built into the permit. The accuracy of the data is generally good, however, USEPA would be the agency to look to and see if a statistical analysis of the accuracy of reported data has been performed. The Illinois EPA has not seen any studies that indicate that self-reported data is routinely inaccurate. Self-reporting is the most efficient way to ensure compliance.

CAAPP facilities, including Premcor, are required to submit an annual air emission report and provide a compliance certification with their CAAPP application stating that they are in compliance with all air applicable requirements. Premcor has provided certification that they are in compliance with the rules and regulations of Title V. Section 5.1.2 of this permit indicates that Premcor is not a major source of HAPs. Since there is no applicable rule it is not appropriate to place a limit on or list specific HAPs. In their annual emission report, due May 1 of each year, Premcor is required to list their HAP emissions. Annual compliance certifications are also required and due by May 1st of every year.

Ambient Air Quality

The Clean Air Act of 1970 defined six *criteria pollutants* and established ambient concentration limits to protect public health. EPA periodically has revised the original concentration limits and methods of measurement, most recently in 1997.

001011

Monitoring sites report data to EPA for these six criteria air pollutants:

- Carbon monoxide (CO)
- Nitrogen dioxide (NO₂)
- Ozone (O₃)
- Sulfur dioxide (SO₂)
- Particulate matter (PM₁₀ and PM_{2.5})
- Lead (Pb)

(PM₁₀ and PM_{2.5} are acronyms for particulate matter consisting of particles smaller than 10 and 2.5 micrometers, respectively.)

You might expect that EPA would track emissions of the same six criteria air pollutants. But ozone is not emitted directly; it forms by chemical reactions of organic compounds with nitrogen oxides in the air, mediated by sunlight. Lead is both a criteria air pollutant and a hazardous air pollutant, and EPA tracks emissions of lead only as a hazardous air pollutant. Ammonia reacts with nitric and sulfuric acids in the atmosphere to form fine particulate matter, so EPA tracks ammonia emissions.

Thus, EPA collects emissions data for three criteria air pollutants:

- Carbon monoxide (CO)
- Sulfur dioxide (SO₂)
- Particulate matter (PM₁₀ and PM_{2.5})

and three precursors/promoters of criteria air pollutants:

- Volatile organic compounds (VOC)
- Nitrogen oxides (NO_x)
- Ammonia (NH₃)

There are currently three ozone monitors in the Madison Co./ St. Clair Co. area located in Alton, Maryville and East St. Louis.

The facility is allowed to emit 230.3 tons per year of VOC as stated in 5.5.1 of the permit. Correlating an actual VOC emission rate to a fenceline reading in parts per million would be very difficult if not impossible to do.

From a regulatory standpoint, monitoring of ambient concentrations of HAPs is not mandated by the Clean Air Act. Practically, it would be almost impossible to detect individual HAP, such as benzene, with ambient air monitoring around the facility. Gasoline is comprised of many different chemicals, with HAPs generally comprising only about 4 to 6 percent of total gasoline emissions and benzene is only a small fraction of that 4 to 6 percent HAP.

Vapor Control System comments

A vapor control system is one that controls vapors from being emitted as a result of soil contamination. This operation captures and removes hydrocarbon vapors from the vadose zone (below ground surface). The vapor control system consists of control boreholes, a knock out drum, vacuum blowers (75 hp/electric), and an enclosed flare (thermal treatment unit). All vapors from the vapor control system are routed to and through the thermal treatment unit. Wastewater treatment and vapor control, in the context of bulk distribution, are usually separate entities.

The vapor control system described in Condition 7.1 is the same unit that was in existence before and was constructed in '92. This is the same unit with no modifications to date. There have been no modifications to the permit since the USEPA negotiated an agreement with the Hartford Working Group, which includes Premcor, about groundwater remediation.

The current vapor recovery system, consists of 12 underground vapor recovery wells that are connected to a thermal treatment unit at the Premcor refinery. Under the current administrative order on consent entered into between Premcor Refining Group, Equilon, LLC, d/b/a Shell Products USA, and Atlantic Richfield Oil Company, the AOC requires the oil companies to replace the 12 vapor recovery wells with new wells that have a greater zone of influence. They have proposed to expand the current thermal treatment unit and put another unit in. The only thing that has been done to the unit since 1992 is general maintenance, replacement of some flame arrestors which were clogged, which needed to be replaced, some upgrades of some software, the replacement of one well through a pilot study, (the well on Birch Street), and that was replaced with a new well.

Wastewater Treatment comments

The only wastewater going to the wastewater treatment plant is storm water rainwater run-off from the refinery operation units of Conoco and the old Premcor Refinery. The water flows into two equalization tanks and then goes to the DAF unit, all of which is primary separation. From the primary separation, wastewater goes to the secondary wastewater treatment plant, which is aeration units and clarifiers. The wastewater then gets put in a pipe and goes out to the river. The primary separation is an oil/water separator. The first part of the wastewater treatment plant are two equalization tanks and a solid air flotation unit, which is the oil/water separation. Once separated that oil goes back into the refinery. Premcor has an NPDES permit for that treatment plant.

Storage Tanks comments

During the permit review, the application that was submitted by Premcor was compared to older permits to determine what permits were in existence and the characteristics of the tanks. Installation of a floating and secondary seals reduce emissions and are considered installation of pollution control equipment. By definition, a modification is an increase in emissions, so it does not become a modified tank subject to NSPS when you add an internal floating roof or secondary seals. However, floating roofs and secondary seals are

what is required by NSPS, so by installing a floating roof and secondary seals, the tank is complying with the NSPS.

In the application, Premcor indicated which tanks were in use and those were the tanks included in the Title V permit. Any tanks in use must be included in the permit. In some instances, construction permits are obtained for equipment which is going to be constructed/used, but then is never brought into operation; in these cases, the facilities usually indicate, through correspondence, that the equipment is not in use/phased out or removed and does not need to be included in their permit. The company would need to obtain a construction permit from the Illinois EPA to put any units back into service.

The materials allowed to be stored are based on their properties. The material must meet the requirements of Section 7.3. The CAAPP permit requires Premcor to keep a record of what's in each tank, how much, and what type of properties of each. Throughput is required to be recorded, as is the inspection of seals and their conditions.

Containment systems are present to prevent land or water contamination and a containment system would be a requirement of Land regulations not air regulations. The air permit contains requirements that the tanks have controls such as floating roofs to contain air emissions. Tanks in the St. Louis non-attainment area, including the ones at this facility, must have secondary seals and floating roofs if they are to store high vapor pressure materials. Traditional containment systems for loss to the land or water is generally not addressed by air. Every tank would typically be required to have what they call a berm. In other words, a wall of dirt that goes all the way around the tank or tanks, and that's required to be large enough to contain the whole volume of material in the tank if it ruptured plus another 10%. We don't have any RCRA or NPDES requirements in Title V permits.

During the application review, the Illinois EPA relies on the company to accurately describe the equipment located at the facility. At the next scheduled inspection after permit issuance, the inspector will verify that the facility is in compliance with the permit, including whether it has unpermitted units. At that point the CAAPP permit is a legally actionable document and if the Illinois EPA finds that there are units at the site not covered by the CAAPP permit the Illinois EPA may take enforcement action against the company. The company stated at the hearing that the American Petroleum Institute writes standards for tank inspections. The API standard for tank inspection requirements is API 653. Under most circumstances, the company is required to inspect each tank every ten years, including a complete internal inspection of the entire tank and a test to determine thickness of the tank walls. Based on the inspection the tank may be returned to service for another ten years, or it may need repairs before being returned to service. The company stated at the hearing that they use an ultrasonic thickness gauge to measure the thickness of the steel during the inspection. The company stated at the hearing that tank inspections are staggered so that an API 653 inspection is done for a few tanks every year. For more information on tank inspections the company should be contacted as the Illinois EPA does not require and has no oversight over these types of inspections. Tank

inspections are not a requirement of Illinois EPA or USEPA so any tank inspection reports would not be submitted to either agency. The facility would keep them on record.

Monitoring comments

The facility previously had a leak detection and repair program in place. This program was actually taken from the existing state permit. Language in Title V permit states that underlying documentation is publicly enforceable, such as monitoring programs. The permit is a document that lays out the regulations that apply to a source. It is renewed every five years. It is not a document that is designed to show current compliance, that is what reports required by the permit are for. Any of these documents may be obtained through FOIA. The monitoring program has to meet certain requirements that are stipulated in Section 7.2.7. as well as the requirements stipulated by IAC rules.

001015

1 of 6



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

P.O. Box 19506, SPRINGFIELD, ILLINOIS 62794-9506

RENEE CIPRIANO, DIRECTOR

217/782-2113

CONSTRUCTION PERMIT

FILE NUMBER 170.05.47.01

RETAIN IN FILE UNTIL _____

PERMITTEE

The Premcor Refining Group, Inc.
Attn: Becky Malloy
201 East Hawthorne
Hartford, Illinois 62048

Application No.: 04070052

I.D. No.: 119050AAA

Applicant's Designation:

Date Received: July 19, 2004

Subject: Storage and Barge Loading of Ethanol and Toluene

Date Issued: September 29, 2004

Location: 201 East Hawthorne, Hartford

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a project for the storage and barge loading of ethanol and toluene, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. i. This permit authorizes the Permittee to store ethanol in the following existing floating roof tanks: 120-1, 120-2, 120-3, 120-4, 120-5, 120-8, 80-4, 80-5, 80-11, 20-8, 10-20, 5-10, 120-9, 10-5, 10-7, 10-10, and T-72.
- ii. This permit authorizes the Permittee to store toluene in any two existing floating roof tanks.

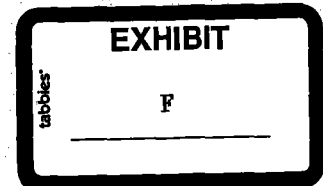
Note: The Permittee may continue to store other materials such as gasoline as authorized by the source's operating permit(s).

- b. The Permittee shall operate and maintain tanks storing ethanol and toluene, including associated control features in accordance with good air pollution control practice to minimize emissions.
 - c. This permit is issued based upon no increase in emissions of volatile organic material (VOM) from the storage of ethanol or toluene, as the vapor pressures of ethanol and toluene are less than the vapor pressure of gasoline, which is currently stored in the tanks.
 - d. Operation of the storage facility shall not exceed a toluene throughput of 300,000 barrels/month and 3,000,000 barrels/year.
- 2a. This permit authorizes the Permittee to load ethanol and toluene at the river dock.

Note: The Permittee may continue to load other materials such as gasoline at the river dock as authorized by the source's operating permit(s).

ROD R. BLAGOJEVICH, GOVERNOR

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286

Page 2

- b. The river dock vapor transfer/flare system shall be operated to control VOM emissions from loading of ethanol and toluene at all times that these materials are being loaded at the river dock.
- c. Operation of the river dock shall not exceed the following limits:

<u>Material</u>	<u>Throughput</u>	
	<u>(Barrels/Mo)</u>	<u>(Barrels/Yr)</u>
Ethanol	150,000	1,500,000
Toluene	300,000	3,000,000

- d. Emissions attributable to the loading of ethanol and toluene shall not exceed the following limits:

<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
VOM	0.1	0.98

3. The Permittee shall maintain the following records:
- Properties of the ethanol and toluene materials handled at the facility, as needed to calculate VOM emissions from handling such materials with supporting documentation.
 - Identification and throughput (barrels/month) for each type of material stored in each tank;
 - Identification and throughput (barrels/month) of each material loaded at the river dock;
 - VOM emissions from the storage of ethanol and toluene (tons/month and tons/year), with supporting calculations.
 - VOM emissions from the loading of ethanol and toluene (tons/month and tons/year), with supporting calculations.
4. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
5. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant

3 of 6

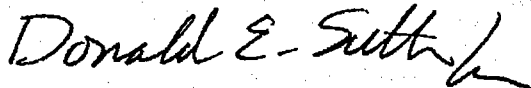
Page 3

records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

6. The Permittee may operate the affected emission units as provided above under this permit until final action is taken on the Clean Air Act Permit Program (CAAPP) application for this source.

Please note that this permit does not establish limits on emissions of hazardous air pollutants (HAPs) from this modification and does not address whether the source currently is a major source of HAPs or will become a major source of HAPs as a consequence of this modification.

If you have any questions on this, please call Jason Schnepf at 217/782-2113.



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

DES:JMS:psj

cc: Region 3



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

4 of 6

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

July 1, 1985

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

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

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:
 - a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emissions of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities,
 - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

IL 532-0226

APC 166 Rev. 5/99

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- e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
6. a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.
- b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
- a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or
 - b. upon finding that any standard or special conditions have been violated, or
 - c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.

Directory Environmental Protection Agency Bureau of Air

May 22, 2003

For assistance in preparing a permit application, contact the Permit Section:

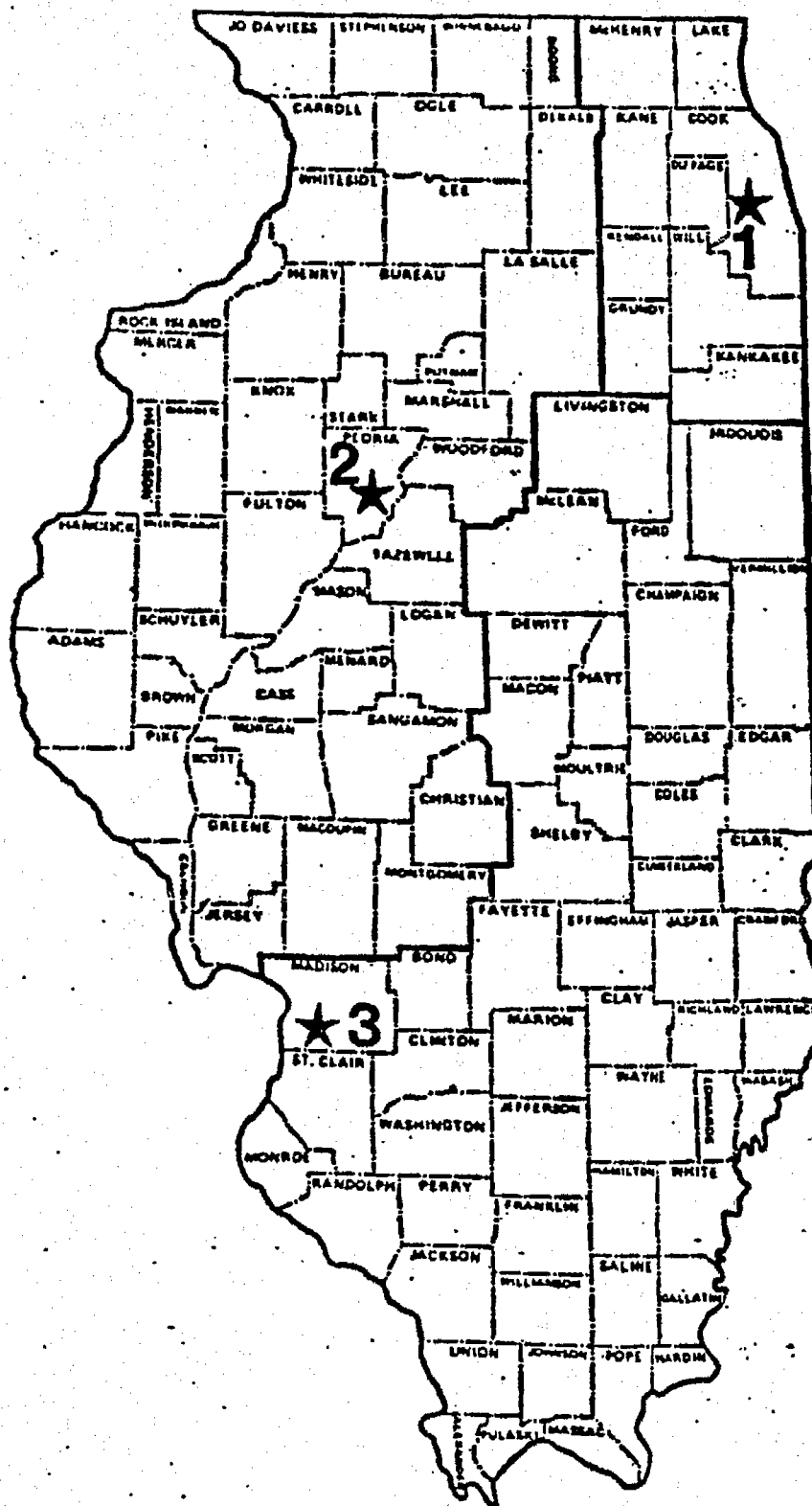
Illinois EPA
Division of Air Pollution Control
Permit Section
1021 N. Grand Ave E.
P.O. Box 19506
Springfield, Illinois 62794-9506
217/782-2113

Or contact a regional office of the Field Operations Section. The regional offices and their areas of responsibility are shown on the map. The addresses and telephone numbers of the regional offices are as follows:

Illinois EPA
Region 1
Bureau of Air, FOS
9511 West Harrison
Des Plaines, Illinois 60016
847/294-4000

Illinois EPA
Region 2
5415 North University
Peoria, Illinois 61614
309/693-5461

Illinois EPA
Region 3
2009 Mall Street
Collinsville, Illinois 62234
618/346-5120





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506

RENEE CIPRIANO, DIRECTOR

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

The Premcor Refining Group, Inc.
 Attn: Becky Malloy
 201 East Hawthorne
 Hartford, Illinois 62048

FILE NUMBER 170.0106

RETAIN IN FILE UNTIL _____

Application No.: 05030053I.D. No.: 119050AAAApplicant's Designation:Date Received: March 14, 2005Subject: Lube CubesDate Issued: June 6, 2005Location: 201 East Hawthorne, Hartford

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of nineteen 500-gallon double walled containers (Lube Cubes), as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. This permit is issued based upon negligible emissions of volatile organic material (VOM) from each lube cube. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.18 tons/year.

Note: the lube cubes may be considered an insignificant activity under the CAAPP.

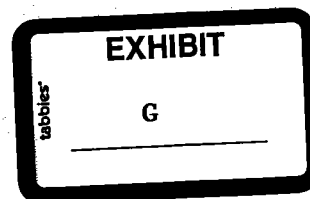
2. Pursuant to 35 IAC 219.121(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe.
3. Pursuant to 35 IAC 219.129(f), the owner or operator of each storage vessel specified in 35 IAC 219.119 shall maintain readily accessible records of the dimension of each storage vessel and an analysis of the capacity of the storage vessel.
4. Emissions from the lube cubes and all other emission units at the source shall not exceed the following limits:

Individual HAPs		Combination Of All HAPs	
(Tons/Month)	(Tons/Year)	(Tons/Month)	(Tons/Year)
0.8	8.0	2.0	20.0

5. The Permittee shall maintain records of the following items for each emission unit or group of related units that has the potential to emit HAPs to verify that the source is not a major source of HAP emissions.

ROD R. BLAGOJEVICH, GOVERNOR

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Page 2

- a. Emissions of HAPs (individual and combination of all HAPs) from each emission unit or group of emission units with supporting documentation and example calculations (tons/month and tons/year).
 - b. As an alternative to keeping the above records, the Permittee may keep a demonstration, which shall be kept current, that the maximum emissions of such operations given the maximum level of activity that could as a practical matter, occur at the source, would not exceed the applicable limits in Condition 4.
6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
 7. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
 8. The Permittee may operate the lube cubes under this construction permit until final action is taken on the Clean Air Act Permit Program (CAAPP) application for this source.

If you have any questions on this, please call Jason Schnepf at 217/782-2113.

Donald E. Sutton

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

DES:JMS:psj

cc: Region 3



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

The Premcor Refining Group, Inc.
Attn: Mr. Tom Mroz
201 East Hawthorne
Hartford, Illinois 62048

Application No.: 05120034
Applicant's Designation:
Subject: Soil Vapor Extraction System
Date Issued: January 24, 2006
Location: 201 East Hawthorne, Hartford

I.D. No.: 119050AAA
Date Received: December 19, 2005

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a Soil Vapor Extraction System, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.1 Soil Vapor Extraction System

1.1.1 Description

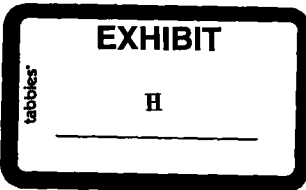
The soil vapor extraction system will be installed to extract hydrocarbon vapors present in the soil using a series of extraction wells. The system consist of a blower which will draw vapors from the wells to a thermal oxidizer.

1.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Soil Vapor Extraction System	Blowers, Ancillary Equipment	Thermal Oxidizer

1.1.3 Applicable Provisions and Regulations

- a. The "affected unit" for the purpose of these unit-specific conditions, is the soil vapor extraction system described in Conditions 1.1.1 and 1.1.2.
- b. The affected unit is subject to 35 IAC Part 219, Subpart TT: Other Emission Units.
- c. i. The affected unit is subject to 35 IAC 219.301: Use of Organic Material, which provides that:



000981

Page 2

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 219.302 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

- ii. Emissions of organic material in excess of those permitted by 35 IAC 219.301 are allowable if such emissions are controlled by thermal incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water.
- d. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

1.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based upon the affected unit not being subject to the 40 CFR Part 63 Subpart GGGG: National Emission Standards for Hazardous Air Pollutants: Site Remediation because the source is not a major source of HAP [40 CFR 63.7881(a)].

1.1.5 Control Requirements and Work Practices

- a. The emission capture and control equipment shall achieve an overall reduction in uncontrolled VOM emissions of at least 81 percent from each affected unit, pursuant to 35 IAC 219.986(a).

Note: this control requirement is less stringent than the control requirement listed in Condition 1.1.3(c)(ii).

- b. The thermal oxidizer shall be in operation at all times when the affected unit is in operation and emitting air contaminants.
- c. The thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation.

000982

Page 3

- d. Natural gas shall be the only fuel fired in the thermal oxidizer.
- e. The maximum gas flow rate to the thermal oxidizer shall not exceed 750 cfm.

1.1.6 Production and Emission Limitations

- a. Emissions from the affected unit shall not exceed the following limits. Compliance with annual limits shall be determined from a running total of 12 months of data.

<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
NO _x	----	3.85
CO	0.27	3.24
VOM	----	7.84

- b. This permit is issued based upon negligible emissions of SO₂, PM and PM₁₀ from the affected unit. For this purpose, emissions of all such pollutants shall not exceed a nominal emission rate of 0.1 lb/hour and 0.44 tons/year combined.

1.1.7 Testing Requirements

- a. When in the opinion of the Agency it is necessary to conduct testing to demonstrate compliance with 35 IAC 219.986, the owner or operator of a VOM emission unit subject to the requirements of 35 IAC Part 219, Subpart TT shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 219.105 [35 IAC 219.988(a)].
- b. Nothing in 35 IAC Part 219 shall limit the authority of the USEPA pursuant to the Clean Air Act, as amended, to require testing [35 IAC 219.988(b)].

1.1.8 Monitoring Requirements

- a. The Permittee shall use Illinois EPA approved continuous monitoring equipment which shall be installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment shall monitor the combustion chamber temperature of each afterburner.

1.1.9 Recordkeeping Requirements

- a. The Permittee shall collect and record all of the following information each day and maintain the information at the source for a period of three years:

000983

Page 4

- i. Control device monitoring data:
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission source.
 - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- b. The Permittee shall maintain a file for the affected unit documenting the following:
- i. Maximum rated exhaust flow rate from the affected unit, as exhausted to the thermal oxidizer (CFM);
 - ii. Maximum VOM concentration in uncontrolled exhaust (ug/L);
 - iii. Maximum rated burner capacity of the thermal oxidizer (mmBtu/hour); and
 - iv. Potential NO_x and CO emissions from the affected unit, with supporting documentation and calculations.
- c. The Permittee shall maintain records of the VOM emissions (tons/month and tons/year) with supporting calculations and documentation.

1.1.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of an affected unit with the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
- b. The Permittee shall notify the Illinois EPA in the following instance [35 IAC 219.991(a)(3)]:
 - i. Any record showing a violation of the requirements of 35 IAC Part 219, Subpart PP, QQ, RR or TT shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.

1.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected unit.

000984

Page 5

1.1.12 Compliance Procedures

- a. Compliance with the VOM emission limit in Condition 1.1.6 shall be based on the recordkeeping requirements in Condition 1.1.9 and the following equation:

$$\text{VOM Emissions} = \text{Blower Discharge Rate (cfm)} \times 28.31685 \text{ L/cf} \\ \times 60 \text{ min/hour} \times \text{VOM concentration (ug/L)} \times (1/10^9) \\ \text{kg/ug} \times 2.20462 \text{ lb/kg} \times (1 - \text{overall control efficiency}/100)$$

- b. Compliance with the NO_x and CO emission limits in Condition 1.1.6 shall be determined by appropriate emission factors and the recordkeeping requirements in Condition 1.1.9.
2. The Permittee may operate the affected unit under this construction permit until final action is taken on the Clean Air Act Permit Program (CAAPP) application for this source. If this construction permit is not incorporated into the initial CAAPP permit issued to this source, the Permittee may operate the affected unit under this construction permit until the CAAPP permit is reissued to address this unit.

If you have any questions on this permit, please contact Jason Schnepf at 217/782-2113.

Donald E. Sutton

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

DES:JMS:psj

cc: Region 3

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

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

July 1, 1985

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

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2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:
 - a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emissions of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities,
 - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

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- e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
6.
 - a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.
 - b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
 7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
 - a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or
 - b. upon finding that any standard or special conditions have been violated, or
 - c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.

000987

DIRECTORY
ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR

For assistance in preparing a permit application contact the Permit Section.

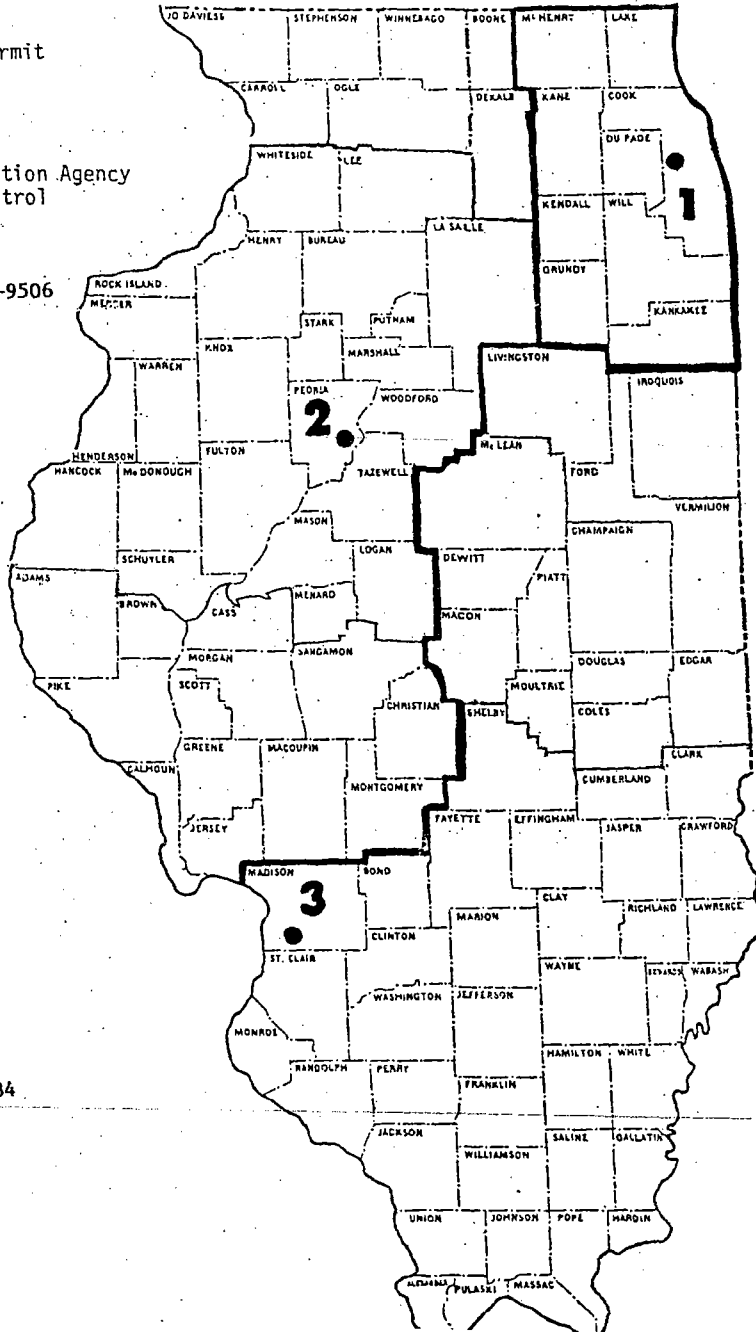
Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
1021 N. Grand Ave E.
P.O.Box 19506
Springfield, Illinois 62794-9506

or a regional office of the Field Operations Section. The regional offices and their areas of responsibility are shown on the map. The addresses and telephone numbers of the regional offices are as follows:

Illinois EPA
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Bureau of air, FOS
9511 West Harrison
Des Plaines, Illinois 60016
847/294-4000

Illinois EPA
Region 2
5415 North University
Peoria, Illinois 61614-
309/693-5463

Illinois EPA
Region 3
2009 Mall Street
Collinsville, Illinois 62234
618/346-5120



000988