BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

EXXONMOBIL OIL CORPORATION Mobile Source Air Toxics Phase II - Fractionator Joliet Refinery	)))))	PCB 14- (Tax Certification - Air)
PROPERTY IDENTIFICATION NUMBER 04-10-22-100-006-0000 or portion thereof	))	

NOTICE

TO: [*Electronic filing*]
John Therriault, Clerk
Illinois Pollution Control Board
State of Illinois Center
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

[*Service by mail*]
Mike Brakefield
ExxonMobil Oil Corporation
P.O. Box 53
Houston, Texas 77001-0053

[*Service by mail*]
Steve Santarelli
Illinois Department of Revenue
101 West Jefferson
P.O. Box 19033
Springfield, Illinois 62794

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Pollution Control Board the **APPEARANCE** and **RECOMMENDATION** of the Illinois Environmental Protection Agency, a paper copy of which is herewith served upon the applicant and a representative of the Illinois Department of Revenue.

Respectfully submitted by,

/s/ Robb H. Layman
Robb H. Layman
Assistant Counsel

Date: December 6, 2013

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
Telephone: (217) 524-9137

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

EXXONMOBIL OIL CORPORATION	)	
Mobile Source Air Toxics Phase II - Fractionator	)	
Joliet Refinery	)	PCB 14-
	)	(Tax Certification - Air)
	)	
PROPERTY IDENTIFICATION NUMBER	)	
04-10-22-100-006-0000 or portion thereof	)	

APPEARANCE

I hereby file my Appearance in this proceeding on behalf of the Illinois Environmental Protection Agency.

Respectfully submitted by,

/s/ Robb H. Layman

Robb H. Layman
Assistant Counsel

Date: December 6, 2013

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EXXONMOBIL OIL CORPORATION Mobile Source Air Toxics Phase II - Fractionator Joliet Refinery	))))	PCB 14- (Tax Certification - Air)
PROPERTY IDENTIFICATION NUMBER 04-10-22-100-006-0000 or portion thereof	))	

RECOMMENDATION

NOW COMES the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA"), through its attorneys, and pursuant to 35 Ill. Adm. Code 125.204 of the ILLINOIS POLLUTION CONTROL BOARD'S ("Board") procedural regulations, files the Illinois EPA's Recommendation in the above-referenced request for tax certification of pollution control facilities. The Illinois EPA recommends **issuance** of a tax certification covering the subject matter of the request. In support thereof, the Illinois EPA states as follows:

1. On or about September 2, 2011, the Illinois EPA received an application and supporting information from EXXONMOBIL OIL CORPORATION ("ExxonMobil") concerning the proposed tax certification of certain air emission sources and/or equipment located at its Joliet refinery in Will County, Illinois. A copy of the application is attached hereto. **[Exhibit A]**.

2. The applicant's business address is as follows:

ExxonMobil Oil Corporation
P.O. Box 53
Houston, Texas 77001-0053

3. The facility address is as follows:

ExxonMobil Oil Corporation
Joliet Refinery
I-55 & Arsenal Road East
Channahon, Illinois 60410

4. The subject matter of this request consists of a Mobile Source Air Toxics Phase II Project, which involved the construction and installation of a new fractionator by ExxonMobil at the Joliet refinery. According to the application, the fractionator and associated process equipment was installed to comply with federal Mobile Source Air Toxics requirements promulgated at 40 CFR Part 80 (Regulations of Fuels and Fuel Additives) that became effective February 26, 2007. *See,* Exhibit A, Attachment at Section C. The application states that these requirements imposed a compliance deadline of January 1, 2011, for the refinery to meet an annual average gasoline benzene concentration of 0.62 volume percent. Benzene is a hazardous air pollutant that is produced in gasoline feedstocks in refinery operations.

5. In order to comply with the recent air toxic requirements for mobile sources, the refinery opted to construct the fractionator ("Dehexanizer"), which is designed "to alter the heavy naphtha stream exiting the Pretreater prior to feeding it into the Reformer stream." *Id.* The project employs a "feed tailoring" approach to benzene removal, which removes precursors to benzene from the gasoline feed leading to the Catalytic Reformer Unit, in contrast to removing benzene from the materials produced by the Catalytic Reformer Unit later in the process. *See,* Attached Permit at 1.1, Project Description. The fractionator and associated process equipment, which includes a fractionating column, feed and effluent exchangers, overhead condenser, reboiler, overhead and bottom product coolers, and other various appurtenances (i.e., pumps, piping and instrumentation) will separate "the six-carbon (C6) fraction, including any benzene precursors, from the desulfurized naphtha and direct this overhead fraction to heavy straight run gasoline component storage with no further processing." *Id.* at Attachment, Section D. These systems and/or devices achieve the necessary reduction in the benzene content of gasoline, as required by recent federal regulations governing motor fuels and fuel additives. In doing so, the Mobile Source Air Toxics Phase II project acts to remove benzene compounds from the gasoline

pool that would otherwise be emitted as contaminants at the point of product use, and therefore prevents or reduces air pollution.

6. Section 11-10 of the Property Tax Code, 35 ILCS 200/11-10 (2002), defines "pollution control facilities" as:

> "any system, method, construction, device or appliance appurtenant thereto, or any portion of any building or equipment, that is designed, constructed, installed or operated for the primary purpose of: (a) eliminating, preventing, or reducing air or water pollution… or (b) treating, pretreating, modifying or disposing of any potential solid, liquid, gaseous pollutant which if released without treatment, pretreatment, modification or disposal might be harmful, detrimental or offensive to human, plant or animal life, or to property."

7. Pollution control facilities are entitled to preferential tax treatment, as provided by 35 ILCS 200/11-5 (2002).

8. Based on information in the application and the primary purpose of the Mobile Source Air Toxics Phase II project to prevent or reduce air pollution, it is the Illinois EPA's engineering judgment that the project's addition of the new fractionator, other process equipment and related appurtenances may be considered as "pollution control facilities" in accordance with the statutory definition and consistent with the Board's regulations at 35 Ill. Adm. Code 125.200. **[Exhibit B].**

9. Because the information in the application demonstrates that the Mobile Source Air Toxics Phase II project satisfies the aforementioned statutory and regulatory criteria, the Illinois EPA recommends that the Board **issue** the applicant's requested tax certification.

Respectfully submitted by,

/s/ Robb H. Layman
Robb H. Layman
Assistant Counsel

DATED: December 6, 2013

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
Telephone: (217) 524-9137

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of December, 2013, I electronically filed the following instruments entitled **NOTICE, APPEARANCE** and **RECOMMENDATION** with:

John Therriault, Clerk
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

and, further, that I did send a true and correct paper copy of the same foregoing instruments, by First Class Mail with postage thereon fully paid and deposited into the possession of the United States Postal Service, to:

Steve Santarelli
Illinois Department of Revenue
101 West Jefferson
P.O. Box 19033
Springfield, Illinois 62794

ExxonMobil Oil Corporation
Mike Brakefield
P.O. Box 53
Houston, Texas 77001-0053

/s/ *Robb H. Layman*
Robb H. Layman
Assistant Counsel

Exxon Mobil Corporation
P.O. Box 53
Houston, Texas 77001-0053
713-431-2961 Telephone
713-431-2694 Facsimile

Michael J. Brakefield
Property Tax Agent
Tax Reporting & Analysis Center

ExxonMobil

August 30, 2011

Floyd E. McKinney, Permit Section
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Re: **Application** - Certification (Property Tax Treatment) Pollution Control Facility
ExxonMobil Oil Corporation, Joliet Refinery
Federal Mandate: Mobile Source Air Toxics Phase II (MSAT2)

Dear Mr. McKinney,

Attached is the referenced application filed by ExxonMobil Oil Corporation for its federally mandated Mobile Source Air Toxics Phase II (MSAT II) project located at the Joliet Refinery. Along with the application, supporting documents are also enclosed. Listed below are all of the items you will find comprising the packet of information:

Document 1 - Application for Certification (Property Tax Treatment)

Document 2 - Construction Permit, Application No. 08100065

Should you require any additional information, we welcome the opportunity to be of assistance. Thank you for your time, efforts and attention to detail in this matter.

Sincerely,

Michael J. Brakefield
Property Tax Agent

Exhibit A

APPLICATION FOR CERTIFICATION (PROPERTY TAX TREATMENT)
POLLUTION CONTROL FACILITY
AIR ☒ WATER ☐

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
P. O. Box 19276, Springfield, IL 62794-9276

This Agency is authorized to request this information under Illinois Revised Statues, 1979, Chapter, 120, Section 502a-5. Disclosure of this information is voluntary. However, failure to comply could prevent your application from being processed or could result in denial of your application for certification.

FOR AGENCY USE

File No.	Date Received	Certification No.	Date

Sec. A — APPLICANT

Company Name: ExxonMobil Oil Corporation	
Person Authorized to Receive Certification: Mike Brakefield	Person to Contact for Additional Details: Brad Kohlmeyer
Street Address: P.O. Box 53	Street Address: I-55 & Arsenal Road East
Municipality, State & Zip Code: Houston, Texas 77001-0053	Municipality, State & Zip Code: Channahon, IL 60410
Telephone Number: (713) 431-2961	Telephone Number: (815) 521-7733
Location of Facility — Quarter Section: 22 / Township: 10 / Range: 9	Municipality: Channahon / Township: 10
Street Address: I-55 & Arsenal Road East	County: Will / Book Number:
Property Identification Number: 04-10-22-100-006-0000	Parcel Number: Section 22 of Channahon Township

Sec. B — MANUFACTURING OPERATIONS

Nature of Operations Conducted at the Above Location:

The Joliet Refinery is a conventional fuels refinery. It recieves crude oil via pipeline and processes the crude into gasoline and distillate fuels.

Water Pollution Control Construction Permit No.: N/A	Date Issued:	
NPDES PERMIT No.: IL0002861	Date Issued: 09/30/09	Expiration Date: 09/30/14
Air Pollution Control Construction Permit No.: 08100065	Date Issued: 11/19/10	
Air Pollution Control Operating Permit No.: 95120304	Date Issued: 08/15/00	

Sec. C — MANUFACTURING PROCESS

Describe Unit Process:

See Attached

Materials Used in Process:

NA - See permit application for individual processes.

Sec. D — POLLUTION CONTROL FACILITY DESCRIPTION

Describe Pollution Abatement Control Facility:

See Attached

Sec. E — POLLUTION CONTROL FACILITY – ACCOUNTING DATA

(1) Nature of Contaminants or Pollutants — CONTAMINANTS

Contaminant or Pollutant	Material Retained, Captured or Recovered: DESCRIPTION	DISPOSAL OR USE
Primarily Cyclohexane among other compounds that are precursors to benzene.		Prevent the production of Benzene in refining process.

(2) Point(s) of Waste Water Discharge

Waste water treatment plant at the tributary to the Des Plaines River

	Plans and Specifications Attached	Yes ☐	No ☒
(3)	Are contaminants (or residues) collected by the control facility?	Yes ☒	No ☐
(4)	Date installation completed _____ status of installation on date of application _____		
(5) a.	FAIR CASH VALUE IF CONSIDERED REAL PROPERTY:	$ 40,000,000.00	
b.	NET SALVAGE VALUE IF CONSIDERED REAL PROPERTY:	$	
c.	PRODUCTIVE GROSS ANNUAL INCOME OF CONTROL FACILITY:	$ 0.00	
d.	PRODUCTIVE NET ANNUAL INCOME OF CONTROL FACILITY:	$ 0.00	
e.	PERCENTAGE CONTROL FACILITY BEARS TO WHOLE FACILITY VALUE:	%	

Sec. F — SIGNATURE

The following information is submitted in accordance with the Illinois Property Tax Code, as amended, and to the best of my knowledge, is true and correct. The facilities claimed herein are "pollution control facilities" as defined in Section 11-10 of the Illinois Property Tax Code.

Michael J. Wakefield — Signature

Property Tax Agent — Title

Sec. G — INSTRUCTIONS

INSTRUCTIONS FOR COMPILING AND FILING APPLICATION

General: Separate applications must be completed for each control facility claimed. Do not mix types (water and air). Where both air and water operations are related, file two applications. If attachments are needed, record them consecutively on an index sheet.

Sec. A	Information refers to applicant as listed in the tax records and the person to be contacted for further details or for inspection of facilities. Define facility location by street address or legal description. A plat map location is required for facilities located outside of municipal boundaries. The property identification number is required.
Sec. B	Self-explanatory. Submit copies of all permits issued by local pollution control agencies. (e.g. MSD Construction Permit)
Sec. C	Refers to manufacturing processes or materials on which pollution control facility is used.
Sec. D	Narrative description of the pollution control facility, indicating that its primary purpose is to eliminate, prevent or reduce pollution. State the type of control facility. State permit number, date, and agency issuing permit. A narrative description and a process flow diagram describing the pollution control facility. Include a listing of each major piece of equipment included in the claimed fair cash value for real property. Include an average analysis of the influent and effluent of the control facility stating the collection efficiency.
Sec. E	List air contaminants, or water pollution substances released as effluents to the manufacturing processes. List also the final disposal of any contaminants removed from the manufacturing processes. Item (1) – Refers to pollutants and contaminants removed from the process by the pollution control facility. Item (2) – Refers to water pollution but can apply to water-carried wastes from air pollution control facilities. Submit drawings, which clearly show (a) Point(s) of discharge to receiving stream, and (b) Sewers and process piping to and from the control facility. Item (3) – If the collected contaminants are disposed of other than as wastes, state the disposition of the materials, and the value in dollars reclaimed by sale or reuse of the collected substances. State the cost of reclamation and related expense. Item (4) – State the date which the pollution control facility was first placed in service and operated. If not, explain. Item (5) – This information is essential to the certification and assessment actions. This accounting data must be completed to activate project review prior to certification by this Agency.
Sec. F	Self-explanatory. Signature must be a corporate authorized signature.

Submit to:	Attention:	Attention:
Illinois EPA P.O. Box 19276 Springfield, IL 62794-9276	Al Keller Permit Section Division of Water Pollution Control	Donald E. Sutton Permit Section Division of Air Pollution Control

ExxonMobil Oil Corporation: Joliet Refinery
Application for Certification (Property Tax Treatment)
Pollution Control Facilities (Air)
MSAT II - Attachments

Section C

Describe Unit Process

The following is an application for the installation of process equipment for the manufacture of fuels that comply with the February 26, 2007 mobile source air toxics ("MSAT2") standards on or before January 1, 2011. These standards are codified in 40 CFR Part 80 "Regulation of Fuels and Fuel Additives", Subpart L "Gasoline Benzene".

This program requires refiners and importers to meet an annual average gasoline benzene concentration of 0.62 volume percent. ExxonMobil has elected to install equipment for the reduction of benzene fuel content at the Joliet Refinery.

This project is solely a regulatory compliance-driven project for the reduction of air toxics from mobile sources, and does not entail refinery unit rate enhancements or a new C6 product.

Material Used In Process

N/A – Please see permit application for individual processes.

Section D

Describe Pollution Abatement Control Facility

The most significant change will be the addition of a new fractionator, a "Dehexanizer", to alter the heavy naphtha stream exiting the Pretreater prior to feeding it into the Reformer unit. This new operation will separate the six-carbon (C6) fraction, including any benzene precursors, from the desulfurized naphtha and direct this overhead fraction to heavy straight run gasoline component storage with no further processing.

The project includes: New Dehexanizer fractionating column, New Dehexanizer feed and effluent exchangers, New Dehexanizer overhead condenser, New Dehexanizer reboiler, New Dehexanizer overhead and bottom products coolers, New overhead and bottom products pumps, New condensate cooler, New condensate flash drum, Replace an existing heat exchange bundle with a bundle of a new design (PrTr unit), Revamp or replace current Naphtha Splitter bottoms pumps (PrTr unit), New Dehexanizer bottoms gas chromatograph (GC) and associated piping and ductwork, Revamp of existing PrTr Reid Vapor Pressure (RVP) analyzer for Light Straight Run (LSR) gasoline, Process Safety Valve (PSV) for fire protection and routed to the flare system; and New piping and valves, including piping to route noncondensable vapors from startup, shutdown, and process upset events to the FCC and/or Coker compressors for recovery, and also an extension of the vents and drains header for purging vessels for maintenance activities.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

PAT QUINN, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

217/782-2113

CONSTRUCTION PERMIT - REVISED
NESHAP SOURCE - NSPS SOURCE

PERMITTEE

ExxonMobil Oil Corporation
Attn: Jeffrey L. Noga, Environmental Group Leader
Post Office Box 874
Joliet, Illinois 60410

Application No.: 08100065
Applicant's Designation:
I.D. No.: 197800AAA
Date Received: November 5, 2010
Subject: MSAT2 Project
Date Issued: November 19, 2010
Location: I-55 and Arsenal Road, Joliet

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a Mobile Source Air Toxics Phase II (MSAT2) project, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.0 OVERALL PROJECT CONDITIONS

1.1 Project Description

ExxonMobil is making changes to this refinery to comply with USEPA's Mobile Source Air Toxics Phase II Rule (MSAT2), 40 CFR Part 80. This rule requires that the benzene content of gasoline be reduced beginning January 1, 2011.

The principal source of benzene in gasoline feedstocks produced at the Joliet Refinery is the Catalytic Reformer Unit. Rather than removing benzene from material produced by this unit, ExxonMobil will use "feed tailoring" to remove compounds that are precursors to benzene, primarily cyclohexane, from the feed to the Catalytic Reformer Unit. The feed tailoring would occur in a new dehexanizer, or fractionator, which would be an extension to the refinery's Pretreater Unit. This unit will be a closed system, normally operating without a direct vent to the atmosphere. However, emissions will potentially occur from leaks in various types of piping components. These components installed as part of this project are addressed in Condition 1.4.

The new fractionator would require heat, supplied by steam from the refinery's existing steam system, to perform the separation process. Specifically, the refinery's Auxiliary Boiler or Heat Recovery Steam Generator would experience an increase in utilization as a result of this project. (See also Condition 1.3.1.)

New tie-ins, such as process safety valves for fire protection, may also be made to the existing flare system. (See also Section 2.1.)

Individual drain systems for stormwater and process wastewater may also be added or modified as part of the project. New individual drain systems are classified as Group 2 wastewater streams as defined in 40 CFR 63.641.

The changes authorized for this project would not result in an expansion of refinery capacity.

1.2 Coordination with CAAPP Permit

1.2.1 The emission units at the source shall continue to be subject to applicable emission standards and requirements as set forth in the source's Clean Air Act Permit Program (CAAPP) permit (Permit No. 95120304) or in subsequent construction permits for projects at the source, whose requirements have not yet been included in the CAAPP permit for the source.

1.3 Applicability of New Source Review

1.3.1 a. This permit is issued based on this project not being a major modification for purposes of the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 and state rules for Major Stationary Sources Construction and Modification (MSSCAM), 35 IAC Part 203. This is because this project will not result in significant increases in emissions of PSD and MSSCAM pollutants. (See also Attachment 1.)

b. For this purpose, as related to the increased utilization of the refinery's steam system, this permit is issued based upon maximum increases in utilization as follows. Upon startup of the MSAT2 Project, these requirements for the modified source supersede Condition 1.4 of the Crude Coker Upgrade Project (Permit No. 05030076), which requirements addressed the operation of the Auxiliary Boiler prior to this project.

i. Up to 84.6 mmBtu/hour (annual average) from the Auxiliary Boiler (55-B-100) and, during downtime of the Auxiliary Boiler for a period of up to 30 days/year, up to 122.5 mmBtu/hour (annual average) from the Heat Recovery Steam Generator.

ii. Emissions increase attributable to increased utilization as follows:

Pollutant	Emissions Tons/Year
NO_x	30.6
CO	26.4
$PM/PM_{10}/PM_{2.5}$	1.2
VOM	2.0
SO_2	10.4

1.4 Applicable Provisions and Emission Standards

1.4.1 Provisions for Components

a. An "affected component" is any new (installed as part of the MSAT2 Project as described in Condition 1.1) or existing component within the "process unit" in which the MSAT2 fractionator will reside and any subsequent replacement of such new or existing component.

i. This permit is issued based on the affected components being subject to 40 CFR Part 60, Subpart GGGa: Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006. This is because the addition of the affected components would constitute a modification pursuant to 40 CFR 60.2 and 60.14.

A. Pursuant to 40 CFR 60.592a(a), the Permittee shall comply with the requirements of 40 CFR 60.482-1a to 60.482-10a (NSPS 40 CFR 60, Subpart VVa).

B. The Permittee shall comply with other applicable requirements of the NSPS such as the requirements for: (i) test methods and procedures, 40 CFR 60.485a; (ii) recordkeeping, 40 CFR 60.486a; and (iii) reporting, 40 CFR 60.487a.

C. Pursuant to 40 CFR 60.593a(g), connectors in gas/vapor and light liquid service shall comply with the requirements of 40 CFR 60.482-8a (NSPS 40 CFR 60, Subpart VVa).

D. In the event of an inconsistency between a provision of the NSPS, 40 CFR 60, Subpart GGGa, cited in the above conditions and the applicable requirement of the NSPS or a source-specific alternative requirement approved by USEPA, the actual regulatory requirement or source-specific requirement shall supersede the relevant provisions of this permit.

Note: Certain provisions in 40 CFR 60, Subpart GGGa, addressing definitions related to affected components (e.g., "process unit") are currently stayed pending reconsideration by USEPA (40 CFR 60.591a). (Refer to 73 FR 31376,

June 2, 2008.) Accordingly, the affected components and the Permittee may become subject to NSPS requirements that are different than those cited in certain conditions of this permit, which reflect the provisions of the NSPS that are currently stayed.

ii. This permit is issued based on the affected components being subject to 40 CFR Part 63, Subpart CC: National Emission Standards for Hazardous Air Pollutants From Petroleum Refineries; however, pursuant to 40 CFR 63.640(p)(2), equipment leaks that are also subject to the provisions of 40 CFR Part 60, Subpart GGGa, are required to comply only with the provisions specified in 40 CFR Part 60, Subpart GGGa.

iii. This permit is issued based on the affected components associated with the project being subject to 35 IAC Part 218 Subpart R: Petroleum Refining and Related Industries; Asphalt Materials.

Note: When the requirements for equipment leaks under 40 CFR 60 Subpart GGGa are more stringent than the LDAR requirements in 35 IAC 218.445-452, compliance with 40 CFR Part 60 Subpart GGGa for the applicable component shall be deemed compliance with 35 IAC 218.445-452.

b. i. Emissions of VOM attributable to the affected components shall not exceed 8.5 tons per calendar year.

ii. A. The Permittee shall maintain a file that contains the following information for the new components installed as part of this project. This file may be kept in either paper or electronic form:

1. The applicable identification number for each component.

2. Results from initial leak monitoring of the component.

3. Leak definition for each component.

4. Monitoring frequency (i.e., when monitoring is due).

B. The Permittee shall maintain records of the following items for new components:

1. Number of components by unit or location and type.

2. Calculated VOM emissions including supporting calculations, attributable to these components (tons/year).

1.4.2 Provisions for Individual Drain Systems (IDS)

a. i. The Permittee shall comply with the established requirements for IDS associated with the MSAT2 Project, as identified in the source's CAAPP permit, for all new or modified IDS affected by this project.

ii. New or modified IDS that are associated with the MSAT2 project are subject to the New Source Performance Standards (NSPS) for VOC Emissions From Petroleum Refinery Wastewater Systems, 40 CFR 60 Subpart QQQ and the General Provisions of the NSPS, 40 CFR 60, Subpart A.

b. i. This permit is issued based upon increases in emissions of VOM attributable to the new or modified IDS of 0.05 tons/year.

ii. A. 1. Each drain shall be equipped with water seal controls. [40 CFR 60.692-2(a)(1)]

2. Each drain in active service shall be checked by visual or physical inspection initially and monthly thereafter for indications of low water levels or other conditions that would reduce the effectiveness of the water seal controls. [40 CFR 60.692-2(a)(2)]

3. Except as provided in 40 CFR 60.692-2(a)(4), each drain out of active service shall be checked by visual or physical inspection initially and weekly thereafter for indications of low water levels or other problems that could result in volatile organic compound (VOC) emissions. [40 CFR 60.692-2(a)(3)]

4. As an alternative to the requirements in 40 CFR 60.692-2(a)(3), if an owner or operator elects to install a tightly sealed cap or plug over a drain that is out of service, inspections shall be conducted initially and semiannually to ensure caps or plugs are in place and

properly installed. [40 CFR 60.692-2(a)(4)]

5. Whenever low water levels or missing or improperly installed caps or plugs are identified, water shall be added or first efforts at repair shall be made as soon as practicable, but no later than 24 hours after detection, except as provided in 40 CFR 60.692-6. [40 CFR 60.692-2(a)(5)]

B. 1. Junction boxes shall be equipped with a cover and may have an open vent pipe. The vent pipe shall be at least 90 cm (3 ft) in length and shall not exceed 10.2 cm (4 in) in diameter. [40 CFR 60.692-2(b)(1)]

2. Junction box covers shall have a tight seal around the edges and shall be kept in place at all times, except during inspection and maintenance. [40 CFR 60.692-2(b)(2)]

3. Junction boxes shall be visually inspected initially and semiannually thereafter to ensure that the cover has a tight seal around the edge. [40 CFR 60.692-2(b)(3)]

4. If a broken seal or gap is identified, first effort at repair shall be made as soon as practicable, but not later than 15 calendar days after the broken seal or gap is identified, except as provided in 40 CFR 60.692-6. [40 CFR 60.692-2(b)(4)]

C. 1. Sewer lines shall not be open to the atmosphere and shall be covered or enclosed in a manner so as to have no visual gaps or cracks in joints, seals, or other emission interfaces. [40 CFR 60.692-2(c)(1)]

2. The portion of each unburied sewer line shall be visually inspected initially and semiannually thereafter for indications of cracks, gaps, or other problems that could result in VOC emissions. [40 CFR 60.692-2(c)(2)]

3. Whenever cracks, gaps or other problems are detected, repairs shall be made as soon as practicable, but no later than 15 calendar days after identification, except as provided in 40 CFR 60.692-6. [40 CFR 60.692-2(c)(3)]

D. Refinery wastewater routed through new process drains and a new first common downstream junction box, either as part of a new IDS or an existing IDS, shall not be routed through a downstream catch basin. [40 CFR 60.692-2(e)]

iii. Before using any equipment installed in compliance with the requirements of 40 CFR 60.692-2, the owner or operator shall inspect such equipment for indications of potential emissions, defects, or other problems that may cause the requirements of 40 CFR 60, Subpart QQQ not to be met. Points of inspection shall include, but are not limited to hatches, caps, and plugs. [40 CFR 60.696(a)]

iv. The Permittee shall comply with the applicable recordkeeping requirements specified by 40 CFR 60.697.

v. The Permittee shall comply with the applicable reporting requirements specified by 40 CFR 60.698.

vi. The Permittee shall maintain records of the following items for new IDS:

A. Number of IDS by unit or location and type.

B. A file containing the maximum VOM emissions including supporting calculations, attributable to these IDS (tons/year).

c. This permit is issued based on the installation of the new IDS associated with the MSAT2 Project not resulting in a modification of the aggregate facility under 40 CFR Part 60, Subpart QQQ because the VOM emission increases from the new IDS associated with this project are less than the decreases that will be achieved from concurrent reductions in VOM emissions within the aggregate facility.

1.4.3 Other Units (Combustion Units)

Note: This Condition previously contained emission limitations on select heaters, which have since been superseded by Condition 1.4.1 of Construction Permit 09040008. Also note that there is

no increase in emissions at these heaters as a result of this project.

1.5 Overall Project Recordkeeping Requirements

1.5.1 The Permittee shall maintain records of the following items:

a. Documentation for the increased utilization associated with the additional steam load placed on the Auxiliary Boiler and Heat Recovery Steam Generator;

b. Periods of time when Heat Recovery Steam Generator provides steam for the project (days/month and days/year);

c. Emissions of NO_x, CO, PM/PM_{10}/$PM_{2.5}$, VOM, and SO_2 attributable to the project's increased steam demand from the Auxiliary Boiler and Heat Recovery Steam Generator, with supporting calculations (tons/month and tons/year); and

d. Total emissions from the project (components, flare [if tie-ins made, see Section 2.1], and increased utilization of Auxiliary Boiler and Heat Recovery Steam Generator) for NO_x, CO, PM/PM_{10}/$PM_{2.5}$, VOM, and SO_2 (tons/month and tons/year).

1.5.2 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

1.6 Overall Project Reporting Requirements

1.6.1 Notification and Reporting of Deviations

Except as specified in a particular provision of this permit or in a subsequent CAAPP Permit for the plant, notifications and reports for deviation from applicable emission standards and control requirements shall include at least the following information: the date and time of the event, a description of the event, information on the magnitude of the deviation, a

description of the corrective measures taken, and a description of any preventative measures taken to prevent future occurrences.

1.7 Authorization to Operate

a. The equipment affected by this project addressed by this permit may be operated under this construction permit until renewal of the source's CAAPP permit.

b. The above condition supersedes Standard Condition 6.

2.0 UNIT-SPECIFIC CONDITIONS

2.1 Unit: Altered Flare System

2.1.1 Description

The new dehexanizer installed as part of the MSAT2 project may include pressure relief valves that are ducted to or tied into the existing refinery flare system. This aspect of the new dehexanizer is still being designed and may not be finalized until after construction of the dehexanizer is commenced. If there are tie-ins to the existing flare system, they may constitute a modification for purposes of the NSPS, 40 CFR 60 Subpart Ja, as provided for by 40 CFR 60.100a(c)(1). (See also Condition 2.1.3(c).).

2.1.2 List of Emission Units

Emission Unit	Description
Altered Flare System	Disposal of waste gases that cannot be recovered from the new dehexanizer and other existing process units.

2.1.3 Applicability Provisions and Emission Standards

a. The "affected flare" for the purpose of these unit-specific conditions is the altered flare system, as described in Conditions 2.1.1 and 2.1.2 that would be present as part of this project if any pressure relief vents from the new dehexanizer are tied into the existing flare system.

b. Upon initial startup of the dehexanizer, the affected flare, if there is a tie-in to the existing flare system, is subject to the NSPS for Petroleum Refineries For Which Construction, Reconstruction, Or Modification Commenced After May 14, 2007, 40 CFR 60 Subpart Ja, and requirements of the General Provisions of the NSPS, 40 CFR 60 Subpart A. Flares are also considered fuel gas combustion devices under 40 CFR 60 Subpart Ja.

i. For the affected flare, the Permittee shall comply with either the SO_2 emission limit in 40 CFR 60.102a(g)(1)(i) or the fuel gas H_2S concentration limit in 40 CFR 60.102a(g)(1)(ii). [40 CFR 60.102a(g)(1)]

ii. Except as provided in 40 CFR 60.102a(h) and (i) below, the Permittee shall not allow flow to each flare unit that is part of the affected flare during normal operations of more than 7,080 standard cubic meters per day (m^3/day) (250,000 standard cubic feet per day (scfd)) on a 30-day rolling average. For an

existing flare, this requirement becomes effective by no later than one year after the flare unit is modified and becomes subject to 40 CFR 60 Subpart Ja. [40 CFR 60.102a(g)(3)]

A. The combustion in a flare of process upset gases or fuel gas that is released to the flare as a result of relief valve leakage or other emergency malfunctions is exempt from 40 CFR 60.102a(g). [40 CFR 60.102a(h)]

B. In periods of fuel gas imbalance that are described in the flare management plan required in 40 CFR 60.103a(a), compliance with the emission limit in 40 CFR 60.102a(g)(3) is demonstrated by following the procedures and maintaining records described in the flare management plan to document the periods of excess fuel gas. [40 CFR 60.102a(i)]

iii. The Permittee shall develop and implement a written flare management plan for the affected flare. The Permittee shall develop and implement the flare management plan by no later than one year after the flare becomes an affected flare subject to 40 CFR 60 subpart Ja. The plan must include the information specified by 40 CFR 63.103(a)(1) through (a)(6). [40 CFR 60.103a(a)]

iv. For the affected flare, the Permittee shall conduct a root cause analysis of any exceedance of an NSPS emission limit or process start-up, shutdown, upset, or malfunction that causes a discharge to the atmosphere in excess of 227 kilograms per day (kg/day) (500 lb per day (lb/day)) of SO_2. For any root cause analysis performed, the Permittee shall record the date and duration of the discharge, the results of the root cause analysis, and the action taken as a result of the root cause analysis. [40 CFR 60.103a(b)]

c. Condition 2.1.3(b)(i) through (iv) above and other conditions in Section 2.1 of this permit addressing provisions of the NSPS, 40 CFR 60, Subpart Ja, shall take effect in accordance with the relevant provisions of the NSPS. In addition, in the event of an inconsistency between a provision of the NSPS, 40 CFR 60, Subpart Ja, cited in such conditions and the applicable requirement of the NSPS or a source-specific alternative requirement approved by USEPA, the actual regulatory requirement or source-specific requirement shall supersede the relevant provisions of this permit.

Note: Certain provisions in 40 CFR 60, Subpart Ja, addressing flares are currently stayed pending reconsideration by USEPA (40 CFR 60.100a(c), 60.101a, 60.102a(g) through (i), 60.103a(a) and (b)). (Refer to 73 FR 55751, September 26, 2008, and 73 FR 78549, December 22, 2008.) Accordingly, the affected flare and the Permittee may become subject to NSPS requirements that are different than those cited in certain conditions of this permit, which reflect the provisions of the NSPS that are currently stayed.

d. The affected flare is subject to 35 IAC 214.301, which provides that no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm.

2.1.4 Non-Applicability Provisions

None.

2.1.5 Control Requirements and Work Practices

a. If the requirements of the NSPS, 40 CFR 60 Subpart Ja (as addressed in Condition 2.1.3(b)) are not applicable to the affected flare, the Permittee shall operate and maintain the affected flare in accordance with good air pollution control practice.

2.1.6 Production and Emission Limitations

a. This permit is issued based upon at most a minimal increase in emissions at the flare as a result of this project.

2.1.7 Testing Requirements

a. Following initial startup of the dehexanizer, the Permittee shall conduct a performance test for the affected flare to demonstrate initial compliance with each applicable emissions limit in 40 CFR 60.102a according to the requirements of 40 CFR 60.8. The notification requirements of 40 CFR 60.8(d) apply to the initial performance test and to subsequent performance tests required by the USEPA or Illinois EPA, but does not apply to performance tests conducted for the purpose of obtaining supplemental data because of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments. [40 CFR 60.104a(a)]

Note: Pursuant to 40 CFR 60.104a(i)(4)(ii), if a single fuel gas combustion device having a common source of fuel gas is monitored as allowed under 40 CFR 60.107a(a)(1)(v),

only one performance test is required. That is, an initial performance test is not required when a new or modified device is added to a common source of fuel gas that previously demonstrated compliance.

Note: Pursuant to 40 CFR 60.104a(j)(4)(iv), if monitoring is conducted at a single point in a common source of fuel gas as allowed under 40 CFR 60.107a(a)(2)(iv), only one performance test is required. That is, an initial performance test is not required when a new or modified device is added to a common source of fuel gas that previously demonstrated compliance.

b. In conducting the performance tests required by 40 CFR 60 Subpart Ja (or as requested by the USEPA or Illinois EPA), the Permittee shall use the test methods in 40 CFR Part 60, Appendices A-1 through A-8 or other methods as specified in 40 CFR 60.104a, except as provided in 40 CFR 60.8(b). [40 CFR 60.104a(c)]

c. i. The Permittee shall determine compliance with the SO_2 emissions limits in 40 CFR 60.102a(g) according to the test methods and procedures in 40 CFR 60.104a(i)(1)-(5). [40 CFR 60.104a(i)]

ii. The Permittee shall determine compliance with the H_2S emissions limit in 40 CFR 60.102a(g) according to the test methods and procedures in 40 CFR 60.104a(j)(1)-(4). [40 CFR 60.104a(j)]

2.1.8 Monitoring Requirements

a. Unless the affected flare is exempted from monitoring as it only burns fuel gas streams that are inherently low in sulfur content, as provided by 40 CFR 60.107a(a)(3), for the affected flare, the Permittee shall comply with the monitoring requirements in 40 CFR 60.107a(a)(2) for H_2S content of fuel gas, as follows: [40 CFR 60.107a(a)]

i. The Permittee shall install, operate, calibrate, and maintain an instrument for continuously monitoring and recording the concentration by volume (dry basis) of H_2S in the fuel gases before being burned in any fuel gas combustion device in accordance with 40 CFR 60.107a(a)(2).

b. If an affected flare is subject to requirements for root cause analysis pursuant to 40 CFR 60.103a(b), for the affected flare, the Permittee shall install, operate, calibrate, and maintain an instrument for continuously monitoring and recording the concentration of reduced sulfur in flare gas. The Permittee shall install this

instrument by no later than one year after the flare becomes a modified flare subject to 40 CFR 60 Subpart Ja. [40 CFR 60.107a(d)]

i. The Permittee shall install, operate, and maintain each reduced sulfur CEMS according to Performance Specification 5 of Appendix B to part 60. [40 CFR 60.107a(d)(1)]

ii. The Permittee shall conduct performance evaluations of each reduced sulfur monitor according to the requirements in 40 CFR 60.13(c) and Performance Specification 5 of Appendix B. The owner or operator shall use Methods 15 or 15A of Appendix A-5 to part 60 for conducting the relative accuracy evaluations. The method ANSI/ ASME PTC 19.10-1981, "Flue and Exhaust Gas Analyses," (incorporated by reference--see 40 CFR 60.17) is an acceptable alternative to EPA Method 15A of Appendix A-5 to 40 CFR 60. [40 CFR 60.107a(d)(2)]

iii. The Permittee shall comply with the applicable quality assurance procedures in Appendix F to 40 CFR 60 for each reduced sulfur monitor. [40 CFR 60.107a(d)(3)]

c. For the affected flare, the Permittee shall install, operate, calibrate, and maintain a continuous parameter monitoring system (CPMS) to measure and record the exhaust gas flow rate. The Permittee shall install this instrument by no later than one year after the flare becomes a modified flare subject to 40 CFR 60 subpart Ja. [40 CFR 60.107a(e)]

i. The CPMS must be able to correct for the temperature and pressure of the system and output flow in standard conditions as defined in 40 CFR 60.2. [40 CFR 60.107a(e)(1)]

ii. The Permittee shall install, operate, and maintain each CPMS according to the manufacturer's specifications and requirements. [40 CFR 60.107a(e)(2)]

d. Excess emissions. For the purpose of reports required by 40 CFR 60.7(c), periods of excess emissions for the affected flares are defined as specified in 40 CFR 60.107a(f)(2) and (4). Note: Determine all averages as the arithmetic average of the applicable 1- hour averages, e.g., determine the rolling 3-hour average as the arithmetic average of three contiguous 1-hour averages. [40 CFR 60.107a(f)]

i. All rolling 3-hour periods during which the average concentration of H_2S as measured by the H_2S continuous monitoring system required under 40 CFR 60.107a(a)(2) exceeds 162 ppmv, all days in which the concentration of H_2S as measured by daily stain tube sampling required under 40 CFR 60.107a(b)(3)(iii) exceeds 162 ppmv, and all rolling 365-day periods during which the average concentration as measured by the H_2S continuous monitoring system under 40 CFR 60.107a(a)(2) exceeds 60 ppmv. [40 CFR 60.107a(f)(2)]

ii. All rolling 30-day periods during which the average flow rate to an affected flare as measured by the monitoring system required under 40 CFR 60.107a(e) exceeds 250,000 scfd. [40 CFR 60.107a(f)(4)]

2.1.9 Recordkeeping Requirements

a. If the final design for this project includes tie-in to the flare system, i.e., an affected flare, the Permittee shall notify the Illinois EPA within 30 days of commencing construction of the affected flare. This notification shall be accompanied by information describing the tie-in to the flare system, including a process diagram for the tie-in and the modified flare system.

b. For the affected flare, the Permittee shall comply with the applicable recordkeeping requirements in 40 CFR 60.108a.

2.1.10 Reporting Requirements

a. If the final design for this project includes tie-ins to the flare system, i.e., an affected flare, the Permittee shall notify the Illinois EPA within 30 days of commencing construction of the affected flare. This notification shall be accompanied by information describing the tie-in to the flare system, including a process diagram for the tie-in and the modified flare system.

b. For the affected flare, the Permittee shall comply with the applicable reporting requirements in 40 CFR 60.108a.

It should be noted that this permit has been revised at the request of the Permittee to: (i) authorize construction of additional piping to route certain material to storage and direct shipping rather than using it as a blend stock for gasoline; (ii) update applicable regulatory requirements for components; (iii) remove provisions for certain heaters (previously Condition 1.4.3) that have been superseded by another project at the source (See Condition 1.4.1 of Permit 09040008); and (iv) clarify applicable provisions for individual drain systems.

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

Edwin C. Bakowski

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: November 19, 2010

ECB:JMS:psj

cc: Region 1

Attachment 1: Summary of Emission Increases From the Project (Tons/Year)

Units Affected By This Project	NO_x	CO	SO_2	VOM	PM	PM_{10}	$PM_{2.5}$
Components	---	---	---	8.5	---	---	---
Individual Drain Systems[a]	---	---	---	---	---	---	---
Flare[b]	---	---	---	---	---	---	---
Auxiliary Boiler/HRSG[c]	30.6	26.4	10.4	2.0	1.2	1.2	1.2
Total:	30.6	26.4	10.4	10.5	1.2	1.2	1.2
Significance Threshold:	40	100	40	40	25	15	10
Greater Than Significant?	No	No	No	No	No	No	No

Note:

--- Minimal or no increase.

[a] No emission increase from the aggregate facility.

[b] Only applicable if there is a tie-in to the flare.

[c] Either the Auxiliary Boiler or the Heat Recovery Steam Generator (HRSG) would be utilized to provide steam for the project.

JMS:psj

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

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 susperseded 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

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.

ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR

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

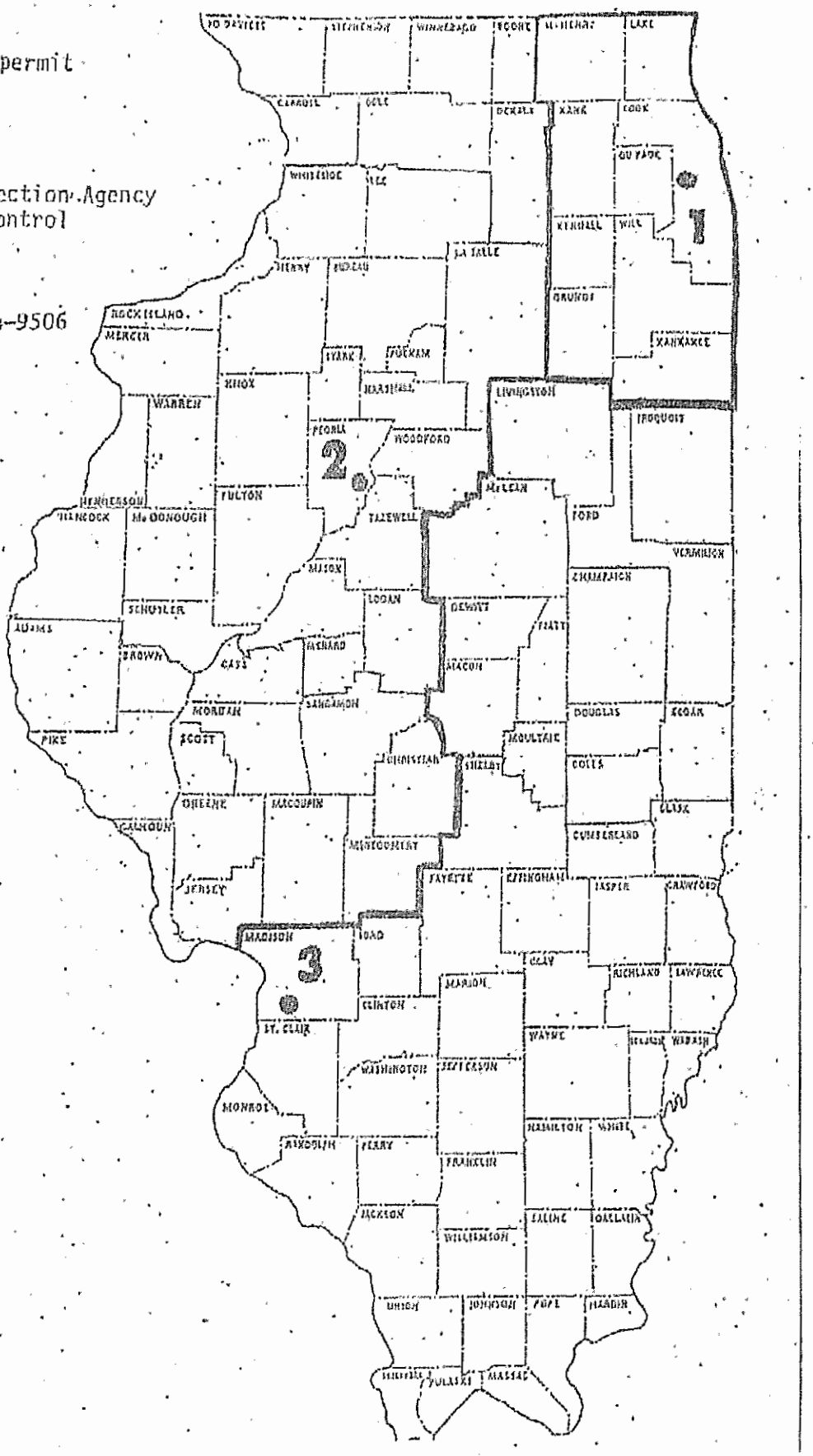
Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
1021 N. Grand Ave E.
P.O. Box 19506
Springfield, Illinois 62794-9506

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
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
309/693-5463

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



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

PAT QUINN, GOVERNOR

Technical Recommendation for Tax Certification Approval

Date: December 06, 2011

To: Robb Layman

From: Edwin C. Bakowski

Subject: Exxon Mobil Corporation TC-11-09-02

This Agency received a request on September 02, 2011 from Exxon Mobil Corporation for an Illinois EPA recommendation regarding tax certification of air pollution control facilities pursuant to 35 Ill. Adm. Code 125.204. I offer the following recommendation.

The air pollution control facilities in this request include the following:

Mobile Source Air Toxics Phase 11(MSAT 11)Project to comply with 40 CFR Part 80 Subpart L. The project involves adding a new fractionator which separates the C6(Six Carbon) fraction from the desulfurized naphtha which reduces Benzene emissions. Because the primary purpose of this system is to reduce or eliminate air pollution, it is certified as a pollution control facility.

This facility is located at I-55 and Arsenal Road, Channahon
The property identification number is 04-10-22-100-006-0000

Based on the information included in this submittal, it is my engineering Judgement that the proposed facility may be considered "Pollution Control Facilities" under 35 IAC 125.200(a), with the primary purpose of eliminating, preventing, or reducing air pollution, or as otherwise provided in this section, and therefore eligible for tax certification from the Illinois Pollution Control Board. Therefore, it is my recommendation that the Board issue the requested tax Certification for this facility.

FEM:psj

Exhibit B