

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PQ LLC,)	
Petitioner,)	
)	
v.)	PCB _____
)	(Permit Appeal – Air)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
Respondent.)	

NOTICE OF FILING

To: Illinois Pollution Control Board
 Attn: Clerk’s Office
 60 E. Van Buren Street, Ste. 630
 Chicago, IL 60605
Don.brown@illinois.gov
 Via electronic mail

Division of Legal Counsel
 Illinois Environmental Protection Agency
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, IL 62794-9276
Epa.dlc@illinois.gov

Via electronic mail

Please take notice that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board a Petition for Review of Agency Determination and Request for Partial Stay on behalf of PQ LLC, as well as an Appearance as counsel for the Petitioner, and a Certificate of Service. A copy of the foregoing will be electronically mailed to you on this date.

/s/ Gary E. Steinbauer

Dated: July 18, 2022

Gary E. Steinbauer, Bar #6302031
 Babst Calland Clements & Zomnir, PC
 603 Stanwix Street, Sixth Floor
 Pittsburgh, PA 15222
 (412) 394-5400
gsteinbauer@babstcalland.com

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PQ LLC,)	
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v.)	PCB _____
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ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
Respondent.)	

APPEARANCE

I hereby file my appearance in this proceeding, on behalf of Petitioner PQ LLC.

Dated: July 18, 2022

/s/ Gary E. Steinbauer

Gary E. Steinbauer, Bar #6302031
Babst Calland Clements & Zomnir, PC
603 Stanwix Street, Sixth Floor
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PETITION FOR REVIEW OF AGENCY DETERMINATION AND REQUEST FOR PARTIAL STAY

NOW COMES PETITIONER, PQ LLC (“PQ”), by and through its attorneys, and pursuant to Section 40(a) of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/40(a), and Part 105 of Title 35 of the Illinois Administrative Code, who hereby petitions the Illinois Pollution Control Board (“Board”) for review of the Illinois Environmental Protection Agency’s (“Agency’s”) issuance of Construction Permit No. 21110013 ("Construction Permit") on June 13, 2022 to PQ (included as “Attachment A”), and requests that a particular condition of the Construction Permit be stayed.

In support of its Petition, PQ states as follows:

1. PQ is the owner and operator of a sodium silicate manufacturing facility in Joliet, Will County, Illinois (“Facility”).
2. The Facility contains, among other things, a sodium silicate fusing furnace (“Furnace #2”) that fuses sand and soda ash at high temperatures to create sodium silicate material that is then sold to customers for use in a number of industrial and consumer products.
3. The Facility has been operated pursuant to Clean Air Act Permit Program (“CAAPP”) No. 96030053, most recently renewed on December 31, 2020 (“CAAPP Permit”).

4. Under the CAAPP Permit, the Facility's Furnace #2 is subject to various emission limits, including for nitrogen oxides (NOx). In addition, the CAAPP Permit requires PQ to conduct periodic performance testing and monitor and record production rates and operating hours to determine whether NOx emission rates from Furnace #2 comply with the NOx emission limits.

5. On November 8, 2021, pursuant to 35 IAC § 210.142, PQ applied for a construction permit under application no. 21110013 ("Application") to authorize the rebuild of Furnace #2. Following the rebuild, it is expected that Furnace #2 would be able to sustain a higher production rate of sodium silicate, although running under this higher production rate would be associated with a higher amount of NOx emissions than before the rebuild.

6. In its Application, PQ projected that the net increase of NOx emissions that would occur following the project, beyond the baseline amount prior to the rebuild, would be less than 25 tons per year, which is under all threshold amounts for a significant net emission increase that would trigger requirements for major stationary sources in nonattainment areas under 35 IAC 203, Subpart C.

7. In addition, PQ's Application indicated that both Furnace #2's baseline NOx emissions prior to the rebuild and projected NOx emissions following the rebuild were less than one ton per day.

8. On June 13, 2022, the Agency issued the Construction Permit

9. The Construction Permit established NOx emissions limits of 109.6 tons per year and 25 lbs per hour for Furnace #2.

10. The Construction Permit established a different method of determining ongoing compliance with these NO_x limits as compared to the CAAPP Permit's method of using periodic performance test data and ongoing operating hours and production data to calculate emissions. In particular, Condition 6 of the Construction Permit requires PQ to install, calibrate, certify, maintain, and operate a NO_x continuous emissions monitoring system (CEMS) to monitor and quantify emissions from Furnace #2, and use these data to determine compliance with the NO_x limits.

11. The Construction Permit does not specify any regulatory or statutory basis for inclusion of Condition 6 of the Construction Permit.

12. Condition 6 of the Construction Permit imposes a CEMS monitoring requirement, even though Furnace #2's emissions are less than one ton of NO_x per day, which is the threshold that the Agency established for substantially similar sources in nonattainment areas, including under 35 IAC § 217.157, below which such sources would expressly not be required to install and operate a CEMS.

13. The Construction Permit does not specify any procedure for limiting the CEMS requirement in Condition 6 in the event that the area in which the Facility exists is redesignated to attainment with federal ozone ambient air quality standards. Such redesignation was proposed by the United States Environmental Protection Agency in March 2022, prior to issuance of the Construction Permit, and is currently pending.

14. The Construction Permit also does not specify any procedure for limiting the CEMS requirement in Condition 6 in the event that additional performance testing required before the CEMS will ultimately be installed indicates a lesser degree of emissions than initially projected.

15. The Agency has previously determined that periodic performance testing is an adequate manner of compliance demonstration for the Facility with respect to NO_x emissions, considering Furnace #2's emissions characteristics.

16. The Agency's decision to include Condition 6 in the Construction Permit is inconsistent with how it has treated other similar sources, including permits it has issued in similar nonattainment areas with similar emissions increases that lack such a CEMS requirement.

17. The Agency's inclusion of Condition 6 and the requirement to install and operate a NO_x CEMS in the Construction Permit is unnecessary to implement the provisions of the Act, not required under any law, and is otherwise arbitrary and capricious, unreasonable, and inconsistent with the Agency's regulations.

18. The Agency's decision to not include in the Construction Permit conditions that limit a NO_x CEMS requirement as indicated in Condition 6 in the event of attainment redesignation for the Facility's area or in the event of additional performance test data prior to installation of the CEMS is not required under any law, and is unreasonable and arbitrary and capricious.

19. PQ has a statutory right to appeal conditions in the Construction Permit, and given the complex, time-consuming, and intensive process to identify CEMS vendors, procure CEMS equipment, install and calibrate the equipment, and develop quality assurance and operating procedures, PQ would likely have to begin implementing Condition 6 of the Construction Permit before a final resolution of this Petition would be reached. Accordingly, PQ's Petition would likely be rendered moot if it remained subject to Condition 6 during this appeal.

20. PQ would be irreparably harmed if it were required to install and operate a CEMS, given the significant costs associated with procuring CEMS equipment, calibrating such

equipment, and hiring third-party consultants that is usually necessary to effectively operate a CEMS, which would impose a substantial economic hardship.

21. There is no apparent adequate remedy at law that exists to remedy the Agency's errors described above outside of this forum at this time.

22. Granting of a temporary stay of Condition 6 of the Construction Permit will not result in any harm to the environment. In particular, this Petition does not seek review of any emissions limits, and granting a stay would not affect the Facility's emissions.

WHEREFORE, for the above reasons, Petitioner, PQ LLC, respectfully requests that the Board find and grant the following:

- a. Issue, in its discretionary authority, a stay of the effectiveness of only Condition 6 in the Construction Permit (but not the entire Construction Permit) until the Board takes final action on this Petition for Review, such that any time period for PQ to install a CEMS as provided in the Construction Permit is tolled during the pendency of this appeal;
- b. Find that the Agency's inclusion of Condition 6 in the Construction Permit is erroneous, arbitrary, capricious, not supported by statutory or regulatory authority, and/or unnecessary to accomplish the purposes of the Act;
- c. Direct that the Agency reissue the Construction Permit excluding Condition 6 (with appropriate revisions to other Conditions that reference Condition 6);
- d. Award such other relief as the Board deems appropriate, including but not limited to payment of PQ's reasonable attorney's fees and expenses incurred in bringing this Petition.

Dated: July 18, 2022

Respectfully submitted,

/s/ Gary E. Steinbauer

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Counsel for PQ LLC



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 · (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/785-1705

CONSTRUCTION PERMIT

PERMITTEE

PQ LLC

Attn: Ken Schulte

111 Ingalls Avenue

Joliet, Illinois 60435

Application No.: 21110013

I.D. No.: 197045ABO

Applicant's Designation:

Date Received: November 8, 2021

Subject: Fusing Furnace #2 Rebuild Project

Date Issued: JUN 13 2022

Location: 111 Ingalls Avenue, Joliet

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a modification/rebuild of the sodium silicate fusing furnace #2, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Description

This permit authorizes the rebuild of sodium silicate furnace #2 (the affected fusing furnace), which includes the replacement of burners and associated burner control system, changes to the firing configuration and an increase in furnace volume. The furnace will continue to produce sodium silicate by the fusion of sand and soda ash at temperatures above 2,000°F. It is expected that sodium silicate production will increase above current rates of production.

Due to the changes being made to the furnace that will alter production rates, material handling operations upstream and downstream of the furnace may experience an increase in utilization of existing capacity. Specifically, the raw material handling system (the affected fusing feed), which consists of silos for soda ash and sand, a weigh bin, and mixer all venting through a common baghouse, will experience an increase in throughput. Downstream bag dump stations for emptying dry materials (filtrate) into existing tanks T-110 and T-111 will experience a negligible increase in particulate matter emissions.

Other equipment in the process that may be replaced or added, such as conveyors and feeders, are not emission units because the molten sodium silicate solidifies and is conveyed in a way that does not generate emissions. Transfer points where solid sodium silicate is transferred into indoor bunkers or outdoor loading operations and into dissolving tanks are negligible emitting activities. A natural gas-fired lip burner that will be installed to initiate 'glass' flow, will also be a negligible emitting activity.

2125 S. First Street, Champaign, IL 61820 (217) 278-5800
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000
595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

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2. Applicable Emission Standards

- a. For the affected fusing furnace, this permit does not alter the applicable requirements for the furnace, as addressed in Clean Air Act Permit Program (CAAPP) Permit No. 96030053, Section 4.1, issued December 31, 2020 (the "CAAPP Permit") and addressed in Construction Permit 09090029 for the replacement of burners on the existing furnace.

3. Nonapplicability Provisions

- a. This permit is issued based on this project not being a major project for purposes of Illinois' rules for Major Stationary Sources Construction and Modification (MSSCAM), 35 IAC Part 203.
- i. For NO_x, this is because the increase in emissions for NO_x of the affected fusing furnace is not significant. In particular, the increase in NO_x emissions is 24.1 tons, which is below the significant emissions rate of 40 tons/year for purposes of MSSCAM.
- ii. For VOM, this is because the source, including this project, is not major under MSSCAM.
- b. This permit is issued based on this project not being a major project for purposes of Illinois' rules for the Prevention of Significant Deterioration of Air Quality (PSD), 35 IAC Part 204. This is because the source, including this project, is not a major source under PSD.

4. Design, Production and Emission Limits

- a. i. The total rated heat input capacity of the new burners within the affected fusing furnace shall not exceed 32.0 mmBtu/hr.

Note: Upon startup of the affected fusing furnace with new burners, the limit in Condition 4.1.2(g) (i) (B) of the CAAPP Permit that applied to the burners being replaced shall no longer apply.

- ii. Sodium silicate production of the affected fusing furnace shall not exceed 132.3 tons/day (based on a monthly average) and 48,281 tons per year. These limits replace the limits in Condition 4.1.2(g) (i) (C) of the CAAPP Permit.
- b. i. Emissions from the affected fusing furnace shall not exceed the following limits. The hourly NO_x and SO₂ limits replace the limits in Conditions 4.1.2(f) (i) (A) and 4.1.2(c) (i) (B) of the CAAPP Permit.

Pollutant	Emission Limits	
	pounds/hour	Tons/Year
NOx	25.0*	109.6
CO	8.20	35.9
VOM	1.30	5.7
PM/PM ₁₀ /PM _{2.5}	4.70	20.6
SO ₂	1.28	5.6

* This limit shall only apply when the NOx CEMS is not in operation (e.g., prior to installation of the CEMS and during breakdown of the CEMS).

- ii. This permit is issued based on minimal emissions of HAPs from the affected fusing furnace, i.e., emissions of an individual HAP being no more than 0.25 tons/year and total HAP emissions of no more than 0.44 ton/year.
- c. This permit is issued based on negligible emissions of PM/PM₁₀/PM_{2.5} from the affected fusing feed controlled by a baghouse, i.e., annual emissions of no more than 0.12 tons of PM/PM₁₀/PM_{2.5}.
- d. i. Except as provided by Condition 4(e) (ii), compliance with annual limits established by this permit shall be calculated from a running total of 12 months of data, i.e., from the sum of the data for the current month and data for the preceding 11 months (12-month total).
- ii. When the NOx CEMS is in operation, compliance with annual NOx limit in Condition 4(b) (i) shall be calculated from a rolling total of 365 days of data, i.e., from the sum of the data for the current day and data for the preceding 364 days (365-day total).

5. Emission Testing

- a. i. A. Within 60 days after achieving the maximum production rate at which the affected fusing furnace will be operated, but not later than 180 days after re-startup of the affected fusing furnace, the Permittee shall have emission testing conducted during representative operating conditions for the affected fusing furnace for NOx, CO, PM and PM₁₀/PM_{2.5} emissions.
- B. 1. This testing for NOx, CO, PM and PM₁₀/PM_{2.5} shall also be conducted at least once every five years thereafter.
- 2. Testing for NOx shall also be conducted at least once a year until the NOx CEMS required under Condition 6 has been installed and is operational.

Note: Ongoing compliance for NO_x is addressed by the monitoring requirements addressed in Condition 6 of this permit.

- ii. The following USEPA methods and procedures shall be used for this testing, unless another method is approved by the Illinois EPA as part of its review of the test plan:

Location of Sample Points	Method 1
Gas Flow and Velocity	Method 2
Flue Gas Weight	Method 3 or 3A
Moisture	Method 4
PM (filterable)	Method 5
PM ₁₀ /PM _{2.5} (filterable)*	Method 201A
Condensable Particulate Matter	Method 202
Nitrogen Oxides	Method 7E
Carbon Monoxide	Method 10

- iii. These tests shall be designed to measure the hourly emission rate of each pollutant in terms of pounds per hour.

- b. For the emission testing required by Condition 5(a), the Permittee shall fulfill the following notification and reporting requirements:

- i. The Illinois EPA shall be notified prior to required emissions tests to enable the Illinois EPA to observe these tests. Notification of the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may at its discretion of the Compliance Section Manager or designee accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.

- ii. At least 60 days prior to the actual date of required emissions testing, a written test plan shall be submitted to the Illinois EPA for review and approval. The Illinois EPA may at the discretion of the Compliance Section Manager or designee accept a test plan less than 60 days prior to testing provided it does not interfere with the Illinois EPA's ability to review this test plan prior to testing. This plan shall describe the specific procedures for testing including:

- A. The person(s) who will be performing sampling and analysis and their experience with similar tests.
- B. The specific conditions under which testing will be performed, including a discussion of why these

conditions would be considered representative operating conditions and the means by which the operating parameters for the emission unit and any control equipment will be determined.

- C. The specific determinations of emissions and operation, which are intended to be made, including sampling and monitoring locations.
 - D. The test method(s) that will be used with the specific analysis method.
 - E. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
- iii. Copies of the Final Reports(s) for required emissions tests shall be submitted to the Illinois EPA within 60 days after the date of testing. The Final Report shall include:
- A. A summary of results.
 - B. General information.
 - C. Description of test method(s), including description of sample points sampling train, analysis equipment, and test schedule.
 - D. Detailed description of test conditions, including process information and furnace and control device information, e.g., equipment condition and operating parameters during testing.
 - E. Data and calculations, including copies of all raw data sheets, opacity observation records and records of laboratory analyses, sample calculations, and data on equipment calibration.

6. Monitoring Requirements

- a. i. The Permittee shall install, calibrate, certify, maintain, and operate a NO_x CEMS on the exhaust stack of the scrubber controlling the affected fusing furnace. The system shall be installed and calibrated within 15 months after the initial startup of the rebuilt furnace. The NO_x CEMS shall be operated as provided in Condition 6(a)(iii) at all times that the affected fusing furnace is in operation, with the exception of monitor malfunctions and short-term calibration issues.
- ii. The CEMS shall be installed, calibrated, certified, maintained, and operated in accordance with 40 CFR 60.13,

40 CFR 60 Appendix B (Performance Specifications 2 and 6) and 40 CFR 60 Appendix F (Quality Assurance Procedures).

- iii. The Permittee shall use an Illinois EPA approved method for calculating flow rate. In conjunction with the Illinois EPA approved flow method calculation, the data acquisition and handling system for the CEMS shall convert the ppm values into pound per hour values.
- b. During periods when the NOx CEMS is not operational (e.g., due to equipment malfunction), the Permittee shall demonstrate compliance with emissions limits using emissions factors derived from the most recent stack testing, fuel analysis or other sources of emissions factors.

7. Recordkeeping Requirements

- a. For the affected fusing furnace, the Permittee shall comply with applicable recordkeeping requirements for the furnace, including recordkeeping for sodium silicate production and emissions, with supporting data and calculations, as set forth in Section 4.1 of the CAAPP Permit.
- b. The Permittee shall maintain records that demonstrate compliance with the requirements of this permit that include the following:
 - i. Identification, type (e.g., gas-fired), and location of the affected fusing furnace.
 - ii. Calendar date of the record.
 - iii. Monthly and annual operating hours.
 - iv. Type and quantity of fuel used monthly and annually.
 - v. Product and material throughput, as applicable.
 - vi. Reports for all applicable emissions tests for NOx conducted on the affected fusing furnace, including results.
 - vii. The date, time, and duration of any startup, shutdown, or malfunction in the operation of the affected fusing furnace.
 - viii. A log for the NOx monitoring device including periods when not in service and maintenance and inspection activities that are performed on the device.
 - ix. Identification of time periods for which operating conditions and pollutant data were not obtained by the continuous emissions monitoring system, including the reasons for not obtaining sufficient data and a description of corrective actions taken.

Page 7

- x. A log of all maintenance and inspections performed on the affected furnace's air pollution control equipment for PM that is performed on the unit.
- xi. The Permittee shall measure and maintain records for the pressure drop across the fusing feed baghouse once per week during periods when the feed system is operating.
- c.
 - i. The Permittee shall maintain records that demonstrate compliance with the monitoring requirements of Condition 6, including flow rate (in scfm) and NOx concentration (in ppm).
 - ii. The Permittee shall submit a report to the Illinois EPA within 30 days after the end of each calendar quarter. This report shall include information identifying and explaining the times and dates when continuous emissions monitoring for NOx was not in operation, other than for purposes of calibrating or performing quality assurance or quality control activities for the monitoring equipment.

8. Reporting Requirements

- a. The Permittee shall notify the Illinois EPA of deviations from the requirements of this permit within 30 days of such occurrence. Reports shall describe the deviation, the probable cause of such deviation, the corrective actions taken, and any preventive measures taken.
- b. One copy of required reports and notifications shall be sent to:
 - i. Via mail or overnight delivery:

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Electronically: epa.boa.smu@illinois.gov

9. Authorization to Operate

The affected fusing furnace with changes authorized by this permit may be operated under this construction permit until this project has been addressed in the CAAPP Permit provided that the Permittee submits an application to amend the CAAPP Permit to address this project. This condition supersedes Standard Condition 6.

Page 8

If you have any questions on this permit, please call Bob Smet at 217/785-9250.

William D. Marr SMS

William D. Marr
Manager, Permit Section
Bureau of Air

WDM:RPS:tan



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 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 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 emission 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 the other applicable statues 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.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PQ LLC,)
Petitioner,)
)
v.) PCB _____
) (Permit Appeal – Air)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
Respondent.)

CERTIFICATE OF E-MAIL SERVICE

I, Gary E. Steinbauer, certify the following:

That I have served the attached PETITION FOR REVIEW OF AGENCY DETERMINATION AND REQUEST FOR PARTIAL STAY on behalf of PQ LLC by e-mail upon the following persons:

Illinois Pollution Control Board
Attn: Clerk's Office
60 E. Van Buren Street, Ste. 630
Chicago, IL 60605
Don.brown@illinois.gov
Via electronic mail on July 18, 2022

Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
Epa.dlc@illinois.gov

Via electronic mail on July 18, 2022

That my e-mail address is gsteinbauer@babstcalland.com;

That the number of pages in the e-mail transmission is 20 pages; and

That the e-mail transmission took place before 5:00 PM on July 18, 2022.

Dated: July 18, 2022

/s/ Gary E. Steinbauer

Gary E. Steinbauer
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