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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

JAN - 2 2004

STATE OF ILLINOIS  
POLLUTION CONTROL BOARD

BOARD OF TRUSTEES OF )  
EASTERN ILLINOIS UNIVERSITY, )

Petitioner, )

v. )

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )

Respondent. )

PCB 04 - 110  
(CAAPP Permit Appeal)

NOTICE OF FILING

TO: Ms. Dorothy M. Gunn  
Clerk of the Board  
Illinois Pollution Control Board  
100 West Randolph Street  
Suite 11-500  
Chicago, Illinois 60601  
**(VIA CERTIFIED MAIL)**

Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276  
**(VIA FIRST CLASS MAIL)**

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board an original and nine copies each of **BOARD OF TRUSTEES OF EASTERN ILLINOIS UNIVERSITY'S PETITION FOR REVIEW; MOTION TO STAY EFFECTIVENESS OF CAAPP PERMIT; and ENTRY OF APPEARANCE OF KATHERINE D. HODGE**, copies of which are hereby served upon you.

Respectfully submitted,

BOARD OF TRUSTEES OF  
EASTERN ILLINOIS UNIVERSITY  
Petitioner,

By: Kath D. Hodge  
Katherine D. Hodge

Dated: December 29, 2003

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

**CERTIFICATE OF SERVICE**

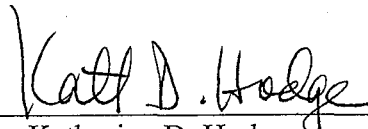
I, Katherine D. Hodge, the undersigned, certify that I have served the attached BOARD OF TRUSTEES OF EASTERN ILLINOIS UNIVERSITY'S PETITION FOR REVIEW; MOTION TO STAY EFFECTIVENESS OF CAAPP PERMIT; and ENTRY OF APPEARANCE OF KATHERINE D. HODGE upon:

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

via Certified Mail, Return Receipt Requested, on December 29, 2003, and upon:

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, postage prepaid, in Springfield, Illinois, on December 29, 2003.

  
\_\_\_\_\_  
Katherine D. Hodge

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 Respondent. )

STATE OF ILLINOIS  
POLLUTION CONTROL BOARD

PCB 04-110  
(CAAPP Permit Appeal)

**PETITION FOR REVIEW**

NOW COMES, Petitioner, BOARD OF TRUSTEES OF EASTERN ILLINOIS UNIVERSITY (hereinafter "Eastern"), 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 Eastern by the Illinois Environmental Protection Agency ("Illinois EPA") pursuant to Section 39.5 of the Act on November 25, 2003.

In support thereof, Eastern states as follows:

1. Eastern owns and operates a steam generating plant, a separate gas-fired boiler, and a gasoline storage tank (the "facility") in Charleston, Illinois, which is classified as a "major source" for purposes of Title V of the Clean Air Act and Section 39.5 of the Act.

2. Pursuant to Section 504 of the Clean Air Act (42 U.S.C. § 7661b(c)) and Section 39.5(5) of the Act, Eastern submitted an application for a CAAPP permit for its Charleston, Illinois, facility to the Illinois EPA on April 17, 1997.

3. On or about October 10, 2003, Illinois EPA sent to public notice a proposed CAAPP permit for this facility and also provided a copy of the proposed permit to the United States Environmental Protection Agency ("USEPA").

4. During the forty-five (45) day comment period provided pursuant to Section 505d of the Clean Air Act (42 U.S.C. § 7661d) and Section 39.5(8) and (9) of the Act, upon information and belief, Illinois EPA received no written objection from the USEPA and, with the exception of Eastern's comments, dated November 24, 2003, (which are attached hereto as Exhibit A), received no comments from the public or any "affected states."

5. On November 25, 2003, Illinois EPA granted a final CAAPP permit for the Eastern facility. (The November 25, 2003, permit is attached hereto as Exhibit B.) Although some of Eastern's concerns were addressed in the final CAAPP permit, the Illinois EPA failed to make the following changes.

6. Condition 5.5.1 of the CAAPP permit provides the total permitted emissions of regulated pollutants is 90.4125.\*

\* In addition, the Permittee shall pay permit fees for 248 tons of SO<sub>2</sub> emissions and any actual SO<sub>2</sub> emissions in excess of 248 tons, as addressed by the Compliance Schedule in Condition 7.1.13. For this purpose, the Permittee shall pay fees each year based on allowed emissions of SO<sub>2</sub> in excess of 248 tons during the prior year, as determined by the information submitted in the Annual Emissions Report.

In its public comments, (Exhibit A), Eastern requested this number be changed to 102.4125,\* in order to achieve consistency with emission limits stated elsewhere in the permit.

7. Condition 5.5.2 of the CAAPP permit provides that the source is considered a minor source for HAPs. Eastern requested that this provision be revised to take account of the permanent discontinuance of use of the scrubber, i.e., in order to maintain Eastern's status as a minor source of HAPs, Eastern had proposed the addition of a federally enforceable limitation on annual coal usage of 16,500 tons/year. This limitation is necessary in order to assure minor source status for HAPs.

8. Condition 7.1.3(d) references 35 Ill. Admin. Code § 214.122(a) as applicable to Eastern's coal-fired boilers. Eastern believes this reference is incorrect because the rule does not and has not ever been applicable to the Eastern facility. Instead, the rule applicable to Eastern's coal-fired boilers is 35 Ill. Admin. Code § 214.142(a).

9. Condition 7.1.5(a) provides that "[t]he baghouse shall be operated at all times when the affected boilers are in operation." Eastern requested that the following language be added "... except during boiler start-ups until the flue gas temperature reaches 400F, during which time the baghouse may be bypassed." The permit did not reflect this change either.

10. Finally, Eastern had requested that Condition 7.1.13(b) of the proposed permit be revised to conform with the language and dates of the Compliance Commitment Agreement ("CCA") established in response to Violation Notice A-2003-00272. The Illinois EPA has not accepted the CCA proposed by Eastern in response to the Violation Notice. So, the milestones and deadlines established in the "compliance schedule" in Condition 7.1.13(b) of the final CAAPP permit may not be consistent with those yet to be established in the accepted CCA. In fact, there is no guarantee that the

Illinois EPA will accept the CCA, as proposed, or at all. Since the allegations raised in the pending Violation Notice are still at issue, Eastern contends that it is inappropriate to establish a detailed "compliance schedule" in this CAAPP permit.

11. For the above-referenced reasons, the CAAPP permit does not reflect the current applicable requirements or the current operations at the facility, and thus is not "consistent with the Clean Air Act and regulations promulgated thereunder and this Act and regulations promulgated thereunder." Such conditions are not required to "accomplish the purposes and provisions of this Act and to assure compliance with all applicable requirements." As such, Illinois EPA has exceeded its authority and imposed conditions that violate Section 39.5 of the Act.

WHEREFORE, Eastern petitions the Board for a hearing on the Illinois EPA's final action to issue this CAAPP permit in this fashion. And, as set forth in the accompanying Motion to Stay Effectiveness of CAAPP Permit, Eastern requests that the effectiveness of the CAAPP permit be stayed until the Board's final determination in this matter.

Respectfully submitted,

BOARD OF TRUSTEES OF  
EASTERN ILLINOIS UNIVERSITY  
Petitioner,

By: Katherine D. Hodge  
One of Its Attorneys

Dated: December 29, 2003

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

EILU:001/Fil/Petition for Review

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

|                              |   |                       |
|------------------------------|---|-----------------------|
| BOARD OF TRUSTEES OF         | ) |                       |
| EASTERN ILLINOIS UNIVERSITY, | ) |                       |
|                              | ) |                       |
| Petitioner,                  | ) |                       |
|                              | ) |                       |
| v.                           | ) | PCB ___ - ___         |
|                              | ) | (CAAPP Permit Appeal) |
| ILLINOIS ENVIRONMENTAL       | ) |                       |
| PROTECTION AGENCY,           | ) |                       |
|                              | ) |                       |
| Respondent.                  | ) |                       |

**MOTION TO STAY EFFECTIVENESS OF CAAPP PERMIT**

NOW COMES, Petitioner, BOARD OF TRUSTEES OF EASTERN ILLINOIS UNIVERSITY (hereinafter "Eastern"), by and through its attorneys, HODGE DWYER ZEMAN, hereby moves the Board to stay the effectiveness of Eastern's Clean Air Act Permit Program ("CAAPP") permit in this matter, pursuant to 35 Ill. Admin. Code § 105.304(b).

In support thereof, Eastern states as follows:

1. On November 25, 2003, the Illinois Environmental Protection Agency ("Illinois EPA") issued a final CAAPP permit (No. 97040070) for Eastern's steam generating plant, a separate gas-fired boiler, and a gasoline storage tank in Charleston, Illinois;
2. Today, December 29, 2003, Eastern has filed a Petition for Review in order to preserve its right to appeal in this matter;
3. A stay of effectiveness of the CAAPP permit is needed to prevent irreparable harm to the Petitioner and to protect a certain and clearly ascertainable right of the Petitioner, the right to appeal permit conditions; and



4. The Illinois EPA, the public, and the environment will not be harmed if a stay is granted.

WHEREFORE, the Petitioner moves the Board to grant a stay of effectiveness of Eastern's CAAPP permit until the Board's final action in this matter.

Respectfully submitted,

BOARD OF TRUSTEES OF  
EASTERN ILLINOIS UNIVERSITY  
Petitioner,

By: Katherine D. Hodge  
One of Its Attorneys

Dated: December 29, 2003

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

EILU:001/Fil/Motion to Stay

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

STATE OF ILLINOIS  
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PROTECTION AGENCY, )  
 )  
Respondent. )

PCB No. 04-110  
(CAAPP Permit Appeal)

ENTRY OF APPEARANCE OF KATHERINE D. HODGE

NOW COMES Katherine D. Hodge, of the law firm of HODGE DWYER  
ZEMAN, and hereby enters her appearance on behalf of Petitioner, BOARD OF  
TRUSTEES OF EASTERN ILLINOIS UNIVERSITY, in the above-referenced matter.

Respectfully submitted,

BOARD OF TRUSTEES OF  
EASTERN ILLINOIS UNIVERSITY  
Petitioner,

By: Katherine D. Hodge  
Katherine D. Hodge

Dated: December 29, 2003

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

EILU:001/Fil/EOA CAAPP-KDH

Facilities Planning and Management

600 Lincoln Avenue  
Charleston, Illinois 61920-3099

Office: 217-581-3520  
Fax: 217-581-5716



EASTERN  
ILLINOIS  
UNIVERSITY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 24, 2003

Mr. Brad Frost  
Division of Air Pollution Control  
Illinois Environmental Protection Agency  
P.O. Box 19506  
Springfield, IL 62794-9506

RE: Final Draft/Proposed CAAPP Permit  
Eastern Illinois University  
I.D. No. 029010AAK  
Application No. 97040070  
10/17/03

Dear Mr. Frost:

On behalf of Eastern Illinois University, I am submitting the attached comments on the subject draft/proposed CAAPP permit.

Please note that we have asked that Sub-Section 7.1.13 be amended to incorporate the terms of the Compliance Commitment Agreement currently being negotiated. We will advise the Permit Section as soon as agreement is reached on the substance of the CCA.

Any questions should be directed to the undersigned at 217/581-2199.

Sincerely,

Gary D. Reed  
Utilities Manager

cc: Daniel J. Goodwin, SECOR  
Jeff Cooley  
Joseph T. Barron, Jr.  
Enclosure



**COMMENTS BY THE PROSPECTIVE PERMITTEE ON THE  
FINAL DRAFT/PROPOSED CAAPP PERMIT  
EASTERN ILLINOIS UNIVERSITY  
I.D. NO. 029010AAK  
APPLICATION NO. 97040070  
10/17/03**

1. Under the "Permittee" caption on the first page, please change "Eastern Illinois University" to "Board of Trustees of Eastern Illinois University", the correct legal ownership name. A similar change should be made to items 1.2 and 1.3 on page 4.
2. The scope of the permit as indicated on the first page is to "operate a steam Generating Plant". As indicated in the permit application and in Section 4.0 of the draft permit, there are several emission units that should be included that are not part of the Steam Generating Plant, including the boiler in Carman Hall and a gasoline storage tank. Therefore, we ask that the first page of the permit be amended to include in the permit scope operation of "a Steam Generating Plant, a separate gas-fired boiler, and a gasoline storage tank".
3. On page 14 of the proposed permit, the table in Sub-Section 5.5.1 should be revised to read as follows. These changes are to achieve consistency with emission limits stated elsewhere in the permit. This request should be construed to supersede the data in Form 292-CAAPP, pages 142 and 143 of the application.

| Pollutant                          | Tons/Year |
|------------------------------------|-----------|
| Volatile Organic Material (VOM)    | 0.4125    |
| Sulfur Dioxide (SO <sub>2</sub> )  | -----*    |
| Particulate Matter (PM)            | 20.0      |
| Nitrogen Oxides (NO <sub>x</sub> ) | 70.0      |
| HAP, not included in VOM or PM     |           |
| TOTAL                              | 102.4125* |
| *(No change to footnote.)          |           |

4. Regarding Sub-Section 5.5.2 Emissions of Hazardous Air Pollutants, we believe this paragraph should be revised to take account of the permanent discontinuance of use of the scrubber. In order to maintain EIU's status as a minor source of

HAPs, we propose the addition of a federally enforceable limitation on annual coal usage of 16,500 tons/year. Using AP-42 emission factors from Table 1.1-15, this limitation will result in potential emissions of hydrogen chloride (HCl) and hydrogen fluoride (HF) of 9.90 tons/year and 1.24 ton/year, respectively. All other HAPs combined will total less than 13.86 ton/year, and thus proposed limitation will assure minor HAP source status.

5. Sub-Section 7.1.3(d) should be revised to read as follows:

"The affected boilers shall comply with 35 IAC 214.142(a) and 35 IAD 214.186, which refers to previous Illinois Pollution Control Board Rule 204 (effective April 14, 1972 until December 14, 1978). The applicable paragraph of Rule 204 is Paragraph 204(c)(1)(B)(i), which states that existing fuel combustion sources located outside the Chicago, St. Louis (Illinois) and Peoria Major Metropolitan Areas may not exceed the following:

- (i) 6.0 pounds of sulfur dioxide per million Btu of actual heat input,  
on or after May 30, 1975....

Note: The Permittee has accepted a lower emission rate of 1.2 lbs/MM Btu pursuant to the compliance schedule in Condition 7.1.13."

(Note: The reference in the proposed permit to 35 IAC 214.122(a) is incorrect; that rule does not and has not ever been applicable to the EIU facility.)

6. Sub-Section 7.1.5, paragraph a, of the proposed permit should be revised to read as follows:
- "a. The baghouse shall be operated at all times when the affected boilers are in operation, except during boiler start-ups until the flue gas temperature reaches 400°F, during which time the baghouse may be bypassed."
7. In paragraph d.ii. of Sub-Section 7.1.12 on page 23 of the proposed permit, "feul" should be corrected to "fuel".
8. The schedule of compliance in paragraph b of Sub-Section 7.1.13 of the proposed permit should be revised to conform with the language and dates of the

Compliance Commitment Agreement established in response to Violation Notice  
A-2003-00272.

In the second paragraph of Sub-Section 8.1, October 17, 2003 should be entered  
as the date of issuance of the draft permit.

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Board of Trustees of Eastern Illinois University  
Attn: Gary Reed  
600 Lincoln  
Charleston, Illinois 61920

Application No.: 97040070

I.D. No.: 029010AAK

Applicant's Designation:

Date Received: April 17, 1997

Operation of: Steam Generating Plant

Date Issued: November 25, 2003

Expiration Date<sup>2</sup>: November 25, 2008

Source Location: 600 Lincoln, Charleston, Coles County, Illinois, 61920

Responsible Official: Gary D. Reed, Utilities Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a Steam Generating Plant, a separate gas-fired boiler and a gasoline storage tank, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Michael Haggitt at 217/782-2113.

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

DES:MVH:jar

cc: Illinois EPA, FOS, Region 3  
USEPA

<sup>1</sup> This permit contains terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

<sup>2</sup> Except as provided in Condition 8.7 of this permit.



TABLE OF CONTENTS

|  | <u>PAGE</u> |
|--|-------------|
| 1.0 SOURCE IDENTIFICATION  | 4           |
| 1.1 Source   |             |
| 1.2 Owner/Parent Company   |             |
| 1.3 Operator   |             |
| 1.4 General Source Description                                       |             |
| 2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT               | 5           |
| 3.0 INSIGNIFICANT ACTIVITIES   | 7           |
| 3.1 Identification of Insignificant Activities                       |             |
| 3.2 Compliance with Applicable Requirements                          |             |
| 3.3 Addition of Insignificant Activities                             |             |
| 4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE                        | 9           |
| 5.0 OVERALL SOURCE CONDITIONS  | 10          |
| 5.1 Source Description   |             |
| 5.2 Applicable Regulations   |             |
| 5.3 Non-Applicability of Regulations of Concern                      |             |
| 5.4 Source-Wide Operational and Production Limits and Work Practices |             |
| 5.5 Source-Wide Emission Limitations                                 |             |
| 5.6 General Recordkeeping Requirements                               |             |
| 5.7 General Reporting Requirements                                   |             |
| 5.8 General Operational Flexibility/Anticipated Operating Scenarios  |             |
| 5.9 General Compliance Procedures                                    |             |
| 6.0 NOT APPLICABLE TO THIS PERMIT                                    | 15          |
| 7.0 UNIT SPECIFIC CONDITIONS   | 16          |
| 7.1 Coal Fired Boilers   |             |
| 7.2 Natural Gas/Fuel Oil Fired Boilers                               |             |
| 7.3 Natural Gas Fired Boiler   |             |
| 7.4 Gasoline Storage Tank  |             |
| 8.0 GENERAL PERMIT CONDITIONS  | 36          |
| 8.1 Permit Shield  |             |
| 8.2 Applicability of Title IV Requirements                           |             |
| 8.3 Emissions Trading Programs                                       |             |
| 8.4 Operational Flexibility/Anticipated Operating Scenarios          |             |
| 8.5 Testing Procedures   |             |
| 8.6 Reporting Requirements   |             |
| 8.7 Obligation to Comply with Title I Requirements                   |             |



PAGE

9.0 STANDARD PERMIT CONDITIONS

41

- 9.1 Effect of Permit
- 9.2 General Obligations of Permittee
- 9.3 Obligation to Allow Illinois EPA Surveillance
- 9.4 Obligation to Comply with Other Requirements
- 9.5 Liability
- 9.6 Recordkeeping
- 9.7 Annual Emissions Report
- 9.8 Requirements for Compliance Certification
- 9.9 Certification
- 9.10 Defense to Enforcement Actions
- 9.11 Permanent Shutdown
- 9.12 Reopening And Reissuing Permit For Cause
- 9.13 Severability Clause
- 9.14 Permit Expiration and Renewal

10.0 ATTACHMENTS

- 10.1 Attachment 1 - Example Certification by a Responsible Official 1-1
- 10.2 Attachment 2 - Guidance on Revising This Permit 2-1
- 10.3 Attachment 3 - Form 199-CAAPP, Application For Construction Permit (For CAAPP Sources Only) 3-1
- 10.4 Attachment 4 - Guidance on Renewing This Permit 4-1

1.0 SOURCE IDENTIFICATION

1.1 Source

Eastern Illinois University  
600 Lincoln  
Charleston, Illinois 61920  
217/581-2199

I.D. No.: 029010AAK

Standard Industrial Classification: 8221, Colleges, Universities,  
and Professional Schools

1.2 Owner/Parent Company

Board of Trustees of Eastern Illinois University  
600 Lincoln  
Charleston, Illinois 61920

1.3 Operator

Board of Trustees of Eastern Illinois University  
University and Hayes  
Charleston, Illinois 61920

Gary Reed, P.E.  
217/581-2199

1.4 General Source Description

The Eastern Illinois University is located at 600 Lincoln, Charleston. The source operates a steam plant for heating and cooling campus buildings. The steam plant is comprised of two (2) coal-fired boilers and two (2) gas-fired boilers with distillate fuel oil as a back-up. The gas-fired boilers are used primarily as back-up for the coal-fired units. There is also a natural gas-fired heating boiler that serves Carman Hall. The source also has a 6,000-gallon gasoline storage tank that is used to fuel University vehicles.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

|                  |  |
|------------------|--|
| Act              | Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]   |
| AP-42            | Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711 |
| ATU              | Allotment Trading Unit   |
| Btu              | British thermal unit   |
| CAA              | Clean Air Act [42 U.S.C. Section 7401 et seq.]   |
| CAAPP            | Clean Air Act Permit Program   |
| CAM              | Compliance Assurance Monitoring  |
| CAS              | Chemical Abstract Service  |
| CO               | Carbon Monoxide  |
| CFR              | Code of Federal Regulations  |
| ERMS             | Emissions Reduction Market System  |
| ft <sup>3</sup>  | Cubic Feet   |
| gal              | Gallon   |
| HAP              | Hazardous Air Pollutant  |
| hr               | hour   |
| IAC              | Illinois Administrative Code   |
| I.D. No.         | Identification Number of Source, assigned by Illinois EPA  |
| Illinois EPA     | Illinois Environmental Protection Agency   |
| °K               | Degrees Kelvin   |
| kPa              | Kilopascals  |
| kg               | Kilograms  |
| kW               | Kilowatts  |
| l                | liters   |
| lb               | Pound  |
| ILCS             | Illinois Compiled Statutes   |
| MBtu             | Million British thermal units  |
| Mg               | Megagrams  |
| MW               | Megawatts  |
| mmHg             | Millimeters of Mercury   |
| mmscf            | Million standard cubic feet  |
| mo               | Month  |
| NESHAP           | National Emission Standards for Hazardous Air Pollutants   |
| NO <sub>x</sub>  | Nitrogen Oxides  |
| NSPS             | New Source Performance Standards   |
| psia             | pounds per square inch absolute  |
| PM               | Particulate Matter   |
| PM <sub>10</sub> | Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods  |
| ppm              | parts per million  |
| PSD              | Prevention of Significant Deterioration, 40 CFR 52.21  |
| RMP              | Risk Management Plan   |
| SIP              | State Implementation Plan  |
| SO <sub>2</sub>  | Sulfur Dioxide   |
| T1               | Title I - identifies Title I conditions that have been carried over from an existing permit  |
| T1N              | Title I New - identifies Title I conditions that are being established in this permit  |

|       |   |
|-------|---|
| T1R   | Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit |
| USEPA | United States Environmental Protection Agency   |
| VOL   | Volatile Organic Liquid   |
| VOM   | Volatile Organic Material   |
| yr    | Year  |

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

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

None

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

None

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

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

Furnaces used for melting metals, other than beryllium, with a brim full capacity of less than 450 cubic inches by volume [35 IAC 201.210(a) (6)].

Equipment used for the melting or application of less than 50,000 lbs/year of wax to which no organic solvent has been added [35 IAC 201.210(a) (7)].

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

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a) (14)].

Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

### 3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

| Emission Unit         | Description   | Date Constructed | Emission Control Equipment |
|-----------------------|---|------------------|----------------------------|
| Boiler 2              | Coal Fired Boiler Rated at 59 MBtu/hr   | 1962             | Baghouse                   |
| Boiler 3              | Coal Fired Boiler Rated at 94 MBtu/hr   | 1966             | Baghouse                   |
| Boiler 4              | Natural Gas Fired Boiler with Distillate Fuel Oil as Back-Up Rated at 120 MBtu/hr | 1969             | None                       |
| Boiler 5              | Natural Gas Fired Boiler with Distillate Fuel Oil as Back-Up Rated at 120 MBtu/hr | 1969             | None                       |
| Carman Boiler         | Natural Gas Fired Boiler Rated at 20.9 MBtu/hr                                    | 1969             | None                       |
| Gasoline Storage Tank | 6,000 Gallon Gasoline Storage Tank  | 1994             | Submerged Loading          |

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of CO, NO<sub>x</sub> and SO<sub>2</sub> emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.



- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### 5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

#### 5.2.5 Future Applicable Regulations

- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

#### 5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to the Illinois EPA, Compliance Section.

#### 5.2.9 CAM Plan

This stationary source has pollutant-specific emissions units that are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, i.e., two coal-fired boilers (Boilers 2 and 3). 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.

#### 5.3 Non-Applicability of Regulations of Concern

None

#### 5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

#### 5.5 Source-Wide Emission Limitations

##### 5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

| Pollutant                          | Tons/Year |
|------------------------------------|-----------|
| Volatile Organic Material (VOM)    | 0.4125    |
| Sulfur Dioxide (SO <sub>2</sub> )  | -----*    |
| Particulate Matter (PM)            | 20.00     |
| Nitrogen Oxides (NO <sub>x</sub> ) | 70.00     |
| HAP, not included in VOM or PM     | -----     |
| Total                              | 90.4125*  |

\* In addition, the Permittee shall pay permit fees for 248 tons of SO<sub>2</sub> emissions and any actual SO<sub>2</sub> emissions in excess of 248 tons, as addressed by the Compliance Schedule in Condition 7.1.13. For this purpose, the Permittee shall pay fees each year based on allowed emissions of SO<sub>2</sub> during the year, i.e. 248 tons, plus the actual emissions of SO<sub>2</sub> in excess of 248 tons during the prior year, as determined by the information submitted in the Annual Emissions Report.

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.5 Records for Operating Scenarios

N/A

5.6.6 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Coal Fired Boilers

7.1.1 Description

Two (2) coal fired boilers rated at 59 and 94 MBtu/hr.

7.1.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Description                               | Emission Control Equipment |
|---------------|---|----------------------------|
| Boiler 2      | Coal Fired Boiler<br>Rated at 59 mmBtu/hr | Baghouse                   |
| Boiler 3      | Coal Fired Boiler<br>Rated at 94 mmBtu/hr | Baghouse                   |

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected boilers" for the purpose of these unit-specific conditions, are the boilers described in Condition 7.1.1 and 7.1.2.
- b. The affected boilers are subject to the emission standards identified in Condition 5.2.2.
- c. The affected boilers shall comply with 35 IAC 212.204, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere from any fuel combustion emission unit for which construction or modification commenced on or after April 14, 1972, using solid fuel exclusively to exceed 0.15 kg of particulate matter per MW-hr of actual heat input (0.1 lbs/mmBtu) in any one hour period unless 35 IAC Section 212.202, 212.203, or 212.205 applies.

- d. The affected boilers shall comply with 35 IAC 214.122(a), which provides that:

No person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hr), burning solid fuel exclusively, to exceed 2.79 kg of sulfur dioxide per MW-hr of actual heat input (1.8 lbs/mmBtu).

Note: The Permittee has accepted a lower emission rate of 1.2 lbs/MBtu pursuant to the compliance schedule in Condition 7.1.13.

- e. The affected boilers shall comply with 35 IAC 216.121, which provides that:

No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 parts per million, corrected to 50 percent excess air [35 IAC 216.121].

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected boilers are not subject to the continuous monitoring requirements of 35 IAC 201, Subpart L, because each affected boiler has a firing rate less than 250 MBtu/hr.
- b. Pursuant to 35 IAC 215.303, fuel combustion emission units are not subject to 35 IAC 215.301, Use Of Organic Material.

7.1.5 Operational and Production Limits and Work Practices

- a. The baghouse shall be operated at all times when the affected boilers are in operation.
- b. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the affected boilers and associated baghouse in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or the USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, review of maintenance and repair records and inspection of the source.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected boilers are subject to the following:

- a. Emissions from the affected boilers 2 & 3, shall not exceed the following limits:

| Pollutant       | Emissions (Ton/yr) |
|-----------------|--------------------|
| PM              | 20.0               |
| NO <sub>x</sub> | 70.0               |

These limits are based on achieving emission rates of 0.1 and 0.33 lb/million Btu for PM and NO<sub>x</sub> respectively. Compliance shall be determined on a

monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were originally established in Permit 84040018 [T1].

#### 7.1.7 Testing Requirements

- a. i. Pursuant to 35 IAC 212.110 and Section 39.5(7)(b) of the Act, testing for PM emissions shall be performed as follows:
  - A. Measurement of particulate matter emissions from stationary emission units subject to 35 IAC Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E [35 IAC 212.110(a)].
  - B. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4 [35 IAC 212.110(b)].
- ii. Upon a written notification by the Illinois EPA, the Permittee shall have the applicable testing for PM, NO<sub>x</sub> or CO emissions, at its own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA [35 IAC 212.110(c)].
- b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act, the Permittee shall have measurements of opacity conducted in accordance with Method 9, 40 CFR part 60, Appendix A, and 35 IAC 212.109, so as to demonstrate compliance with Condition 7.1.3(b).
- c. Pursuant to 35 IAC 214.101(e) and 214.104(c), the Permittee shall demonstrate compliance or non-compliance with Condition 7.1.3(d) (see also 35 IAC 214.122(a)) by either an analysis of calendar monthly composites of daily fuel samples or by compliance with 35 IAC 214.101(c), at the option of the Permittee. The following methods shall be used for sulfur and heating value determinations: (see also 35 IAC 214.104(c))
  - i. For solid fuel sampling:

ASTM D-2234 (1989)  
ASTM D-2013 (1986)
  - ii. For sulfur determinations:



ASTM D-3177 (1984)  
ASTM D-2622 (1987)  
ASTM D-3180 (1984)  
ASTM D-4239 (1985)

iii. For heating value determinations:

ASTM D-2015 (1985)  
ASTM D-3286 (1985)

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Conditions 5.5.1 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Pursuant to 35 IAC 212.110(e) and Section 39.5(7)(e) of the Act, the Permittee shall retain records of all tests which are performed:
  - i. The date, place and time of sampling or measurements;
  - ii. The date(s) analyses were performed;
  - iii. The company or entity that performed the analyses;
  - iv. The analytical techniques or methods used;
  - v. The results of such analyses; and
  - vi. The operating conditions as existing at the time of sampling or measurement.
- b. Records addressing use of good operating practices for the affected boilers and associated baghouse:
  - i. Records for periodic inspections with date, individual performing the inspection, and nature of inspection; and
  - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- c. Records for each coal analysis that includes the sulfur content (weight percent) and heating value as determined from the procedures of Condition 7.1.7(c).

- d. Coal consumption, by supplier or mine, in tons per month and tons per year.
- e. Operating hours for the affected boilers, hr/day and hr/year.
- f. Emissions of NO<sub>x</sub>, SO<sub>2</sub> and PM in tons per month and tons per year using the compliance procedures of Condition 7.1.12(d).

7.1.10 Reporting Requirements

- a. Prior to conducting testing for emissions to demonstrate compliance, the Permittee shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from Condition 7.1.7(a) (see also 35 IAC 212.110) that will be used [35 IAC 212.110(d)].
- b. The Permittee shall notify the Illinois EPA, within 30 days, of deviations of the affected boilers with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
  - i. Operation of an affected boiler with defects in the baghouse that may result in emissions of PM in excess of the standards specified in Condition 7.1.3(b) or 7.1.3(c).
  - ii. Emissions from an affected boiler in excess of the limits specified in Condition 5.5.1, 7.1.6 or 7.1.13.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.1.12 Compliance Procedures

Compliance with applicable emission standards and limitations is addressed by recordkeeping requirements in Condition 7.1.9 and following:

- a. Compliance with Condition 7.1.3(b) and 7.1.3(c) is addressed by proper operation of the baghouse and testing, as addressed by Conditions 7.1.5 and 7.1.7.
- b. Compliance with Condition 7.1.3(d) is addressed by testing pursuant to Condition 7.1.7(c). For this purpose the equation listed below shall be used to determine emissions for comparison to the applicable emission standard, 1.2 lb SO<sub>2</sub>/MBtu:

$$E = 18,050(S)/(H)$$

Where:

E = Actual SO<sub>2</sub> emissions, lb/MBtu

S = Sulfur, weight %

H = Heating value, Btu/lb

- c. Compliance with Condition 7.1.3(e) is addressed by the work-practices inherent in operation of the boilers.
- d. i. Compliance with emission limitations, in Condition 5.5.1 and 7.1.6 is addressed by emissions calculated using appropriate emission factors derived from the most recent stack test approved by the Illinois EPA or from AP-42, Fifth Edition, Volume I Chapter 1: External Combustion Sources:
- ii. For this purpose, the equation listed below shall be used.

Boiler Emissions (lb) = Fuel Consumption, (ton) x Applicable Emission Factor, (lb/ton);  
or

Fuel Consumption, (ton) x (2000 lb/ton) x Heat Content, (Btu/lb) x (1 MBtu/1,000,000 Btu) x Applicable Emission Factor, (lb/MBtu)

#### 7.1.13 Compliance Schedules

- a. The Permittee was sent Violation Notice A-2003-00272 by the Illinois EPA for a number of violations related to the affected boilers, including failing to comply with PSD, modifying the operation of the boilers without the required State construction permit, and failing to file complete and accurate Annual Emission Reports for calendar years 2000 and 2001, and failing to timely file a CAAPP permit application. There is insufficient data to demonstrate that the Permittee is in compliance with the above referenced allegations. The permit shield in Condition 8.1 does not shield the Permittee from possible enforcement actions initiated by either USEPA or the Illinois EPA involving matters identified in or related to the above referenced Violation Notice.
- b. For the affected boilers, the Permittee shall comply with the following schedule of compliance related to the alleged violations:

| Milestone  | Timing               |
|--|----------------------|
| Either discontinue use of coal that does not comply with an SO <sub>2</sub> emission limit of 1.2 lb/mmBtu and discontinue operation of the existing scrubber, <u>or</u> | By December 31, 2003 |

| Milestone  | Timing |
|--|--------|
| Conduct and submit for Illinois EPA review a detailed engineering assessment of the scrubber, which assessment demonstrates that the Permittee can readily repair the scrubber with available funds to enable compliance with an SO <sub>2</sub> limit of 1.2 lb/mmBtu to be reliably achieved with the coal that is being used. |        |

| Milestone  | Timing  |
|--|---|
| <p>Continue efforts for the University's preferred approach to compliance, that is, replacement of the existing boilers with a new facility equipped with modern emission control technology that is able to burn high-sulfur coal and comply with applicable requirements, including:</p> <p>a. Prepare and submit an evaluation of the projected capital cost and annualized operating and maintenance costs for the University of its preferred approach to compliance and other likely approaches, such as installation of a new scrubber on the boilers and conversion to natural gas.</p> <p>b. Apply for sufficient funding to carry out the preferred approach as part of the University's annual budget proposal.</p> <p>c. Prepare and submit for Illinois EPA review a demonstration showing that the proposed new facility would utilize Best Available Control Technology (BACT) for SO<sub>2</sub> and other pollutants as required by PSD or would not require PSD approval.</p> <p>d. When funding is obtained, proceed on an expeditious schedule to obtain necessary approvals and permits and carry out development of the new facility.</p>                  | <p>By December 31, 2003.</p> <p>In the winter of 2003/2004, with the budget proposal for FY 2005.</p> <p>By March 31, 2004</p> <p>Schedule to be submitted by the Permittee.</p>            |
| <p>Prepare and implement contingency measures in the event that the University does not obtain funding for its preferred approach, including:</p> <p>a. Prepare and submit for Illinois EPA review a contingency plan. This plan shall evaluate measures that could be used by the University in the event that funding for a new boiler facility is not approved, including energy conservation measures and increased use of natural gas, and identifies feasible measures to further reduce SO<sub>2</sub> emissions from the boilers by at least 10 percent, with schedule for implementation.</p> <p>b. If the University's preferred approach to compliance does not receive funding or is not adequately funded for FY 2005, submit a complete application for a PSD permit for the existing boilers, which application addresses repair of the existing scrubber or installation of new scrubber(s).</p> <p>c. If the University's preferred approach to compliance does not receive funding or is not adequately funded. For FY 2006 or if SO<sub>2</sub> emissions from the affected boilers exceed 242 tons in calendar year 2004, implement the contingency plan</p> | <p>By March 31, 2004</p> <p>No later than 120 days after funding is not approved*</p> <p>No later than 120 days after funding is not approved* or May 1, 2005, whichever ever is later.</p> |

\* For this purpose, funding shall not be considered approved if it is not submitted as part of the budget proposal to the legislature or is not approved by the legislature as part of the regular session.

c. Submittal of Progress Reports

Quarterly Progress Reports shall be submitted beginning with the last quarter of 2003 and ending upon the achievement of compliance. These reports shall be submitted no later than 30 days after the end of the calendar quarter. The Progress Report shall contain at least the following:

- i. The required date for achieving the interim commitments, and actual dates when such commitments were achieved.
  - ii. Any interim commitments accepted by the Permittee or otherwise established for the affected boilers as part of the resolution of enforcement action, with the associated date or schedule of dates.
  - iii. An explanation of why any required timeframe for any interim commitment was not met, and any preventive or corrective measures adopted.
  - iv. A discussion of progress in complying with interim commitments that are subject to future deadlines.
- d. Within 120 days of resolution of this enforcement action, the Permittee shall apply to revise this permit if any additional requirements are established for the affected boilers as part of resolution.
- e. The Permittee shall submit a written notification to the Illinois EPA within 30 days of coming into full compliance.

Note: The above compliance schedule is based upon information available to the Illinois EPA and commitments made by the Permittee in a letter dated October 8, 2003. Additional information in regards to these boilers may be submitted to the Illinois EPA prior to the final issuance of the permit. If additional information is submitted prior to permit issuance, the Illinois EPA will revise the compliance schedule accordingly.

7.2 Natural Gas/Fuel Oil Fired Boilers

7.2.1 Description

Natural gas fired boilers with distillate fuel oil as back up. The boilers were constructed in 1969 and modified in 1985 and 1986 when the oil firing capability was added.

7.2.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Description   | Emission Control Equipment |
|---------------|---|----------------------------|
| Boiler 4      | Natural Gas Fired Boiler with Distillate Fuel Oil as Back-Up Rated at 120 MBtu/hr | None                       |
| Boiler 5      | Natural Gas Fired Boiler with Distillate Fuel Oil as Back-Up Rated at 120 MBtu/hr | None                       |

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected boilers" for the purpose of these unit-specific conditions are the boilers described in Condition 7.2.1 and 7.2.2.
- b. Each affected boiler is subject to the emission standards identified in Condition 5.2.2(b).
- c. Each affected boiler is subject to 35 IAC 212.206, which provides that:

No person shall cause or allow the emissions of particulate matter into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hr of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lbs/mmBtu) [35 IAC 212.206].

- d. Each affected boiler is subject to 35 IAC 214.122(b)(2), which provides that:

No person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lb/mmBtu) [214.122(b)(2)].

- e. Each affected boiler is subject to 35 IAC 216.121, which provides that:

No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 parts per million, corrected to 50 percent excess air [35 IAC 216.121].

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected boilers are not subject to the continuous monitoring requirements of 35 IAC 201, Subpart L, because each affected boiler has a firing rate less than 250 MBtu/hr.
- b. Pursuant to 35 IAC 215.303, fuel combustion emission units are not subject to 35 IAC 215.301, Use Of Organic Material.
- c. This permit reflects a determination by the Illinois EPA, which was originally made during the processing of permit 75040132, that the addition of distillate oil-firing capability to the boilers in 1985 and 1986 did not result in the applicability of emission standards under the NSPS because oil is used as a backup fuel and is limited to no more than 10 percent of the annual capacity of each boiler. [See Condition 7.2.5(c)].

7.2.5 Operational and Production Limits and Work Practices

- a. At all times the Permittee shall to the extent practicable maintain and operate the affected boilers in a manner consistent with good air pollution control practice for minimizing emissions.
- b. The affected boilers shall only be fired with natural gas and distillate fuel oil as the fuels.
- c.
  - i. The annual fuel oil usage in the affected boilers shall not exceed 301,800 gallons [T1].
  - ii. The annual capacity factor for distillate fuel oil use in each boiler shall not exceed 10.0 percent.
- d. The Permittee shall not utilize distillate fuel oil in the affected boilers with a sulfur content greater than the following value. This requirement is being imposed to ensure compliance with condition 7.2.3(d):
  - i.  $\text{Maximum weight percent sulfur} = (0.000015) \times \text{Gross heating value of oil, (Btu/lb)}$ .



7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected boilers are subject to the following:

- a. Emissions from the affected boilers 4 and 5 shall not exceed the following limit. Compliance with these limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

| Pollutant       | Emissions<br>Ton/yr |
|-----------------|---------------------|
| SO <sub>2</sub> | 6.0                 |

The above limitation contains revisions to previously issued Permit 75040132. Specifically, it was revised to set a limit for boilers 4 and 5 only, rather than an aggregate limit that also included the coal-fired boilers (Boilers 2 and 3). [T1R].

7.2.7 Testing Requirements

- a. i. Pursuant to 35 IAC 212.110 and Section 39.5(7)(b) of the Act, testing for PM emissions shall be performed as follows:
  - A. Measurement of particulate matter emissions from stationary emission units subject to 35 IAC Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E [35 IAC 212.110(a)].
  - B. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4 [35 IAC 212.110(b)].
- ii. Upon a written request by the Illinois EPA, the Permittee shall conduct the applicable testing for PM, NO<sub>x</sub> or CO emissions, at its own expense, to demonstrate compliance, pursuant to Section 39.5(7)(d) of the Act, and 35 IAC 212.110(c). Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act, the Permittee shall have measurements of opacity conducted in accordance with Method 9, 40 CFR part 60, Appendix A, and 35 IAC 212.109.

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Conditions 5.5.1, 7.2.3(b), 7.2.3(c) and 7.2.3(d), pursuant to Section 39.5(7) (b) of the Act:

- a. Pursuant to 35 IAC 212.110(e) and Section 39.5(7) (e) of the Act, the Permittee shall retain records of all tests which are performed.
  - i. The date, place and time of sampling or measurements;
  - ii. The date(s) analyses were performed;
  - iii. The company or entity that performed the analyses;
  - iv. The analytical techniques or methods used;
  - v. The results of such analyses; and
  - vi. The operating conditions as existing at the time of sampling or measurement.
- b. The maximum sulfur content, in weight percent, of distillate fuel oil used in the affected boilers. This record shall be updated anytime a different grade of distillate fuel oil or vendor is used.
- c. Natural gas consumption in standard cubic feet or therms per month and standard cubic feet or therms per year.
- d. Distillate fuel oil consumption in gallons per month and gallons per year.
- e. Emissions of SO<sub>2</sub> in tons per month and tons per year using the compliance procedures of Condition 7.2.12(c)

7.2.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, in 30 days of deviations of an affected boiler with the permit requirements as follows, pursuant to Section 39.5(7) (f) (ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:
  - i. The use of distillate fuel oil with a sulfur content in excess of the limit specified in Condition 7.2.5(b) with the length of time

this fuel was used and the effect on emissions of SO<sub>2</sub>.

- ii. Emissions of SO<sub>2</sub> from the affected boiler in excess of the limits specified in Condition 7.2.6.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.2.12 Compliance Procedures

Compliance with emission standards and limitations shall be based on the recordkeeping requirements in Condition 7.2.9 and the following:

- a. Compliance with Conditions 7.2.3(b) and 7.2.3(c) is addressed by the work-practices inherent in operation of natural gas-fired and distillate oil-fired boilers.
- b. Compliance with Condition 7.2.3(d) is addressed by operation of the boiler with distillate fuel oil with a sulfur content meeting the specification of Condition 7.2.5(b).
- c. Compliance with Condition 7.2.3(e) is addressed by the work practices inherent in operation of natural gas-fired and distillate oil-fired boilers.
- d. Compliance with the emission limits of Conditions 5.5.1 and 7.2.6 shall be based on the appropriate emission factors as listed below:

- i. The following emission factors for combusting natural gas:

| <u>Pollutant</u> | <u>Emission Factor</u><br><u>(lb/mmscf)</u> |
|------------------|---|
| CO               | 84  |
| NO <sub>x</sub>  | 280   |
| SO <sub>2</sub>  | 0.6   |
| VOM              | 5.5   |
| PM               | 7.6   |

These are the emission factors for natural gas combustion in large (>100 mmBtu/hr), uncontrolled boilers from Tables 1.4-1 and 1.4-2 of the USEPA Manual AP-42, Volume I, Fifth Edition, Supplement D, March 1998.

Boiler Emissions (lb) = Natural Gas Consumption, (mmscf) x The Applicable Emission Factor, (lb/mmscf)

- ii. The following emission factors for combusting distillate fuel oil:

| <u>Pollutant</u> | <u>Emission Factor</u><br><u>(lb/1000 gallons)</u> |
|------------------|--|
| SO <sub>2</sub>  | 142 (S)  |

|                 |     |
|-----------------|-----|
| PM              | 3.3 |
| NO <sub>x</sub> | 24  |
| CO              | 5   |
| VOM             | 0.2 |

These are the emission factors for distillate fuel oil combustion in large (>100 mmBtu/hr) boilers from Tables 1.3-1, 1.3-2, and 1.3-3 of the USEPA Manual AP-42, Volume I, Fifth Edition, Supplement E, September 1998. S indicates that the weight % of sulfur in the oil should be multiplied by the value given.

Boiler Emissions (lb) = Distillate Fuel Oil Consumption, (Gallons) x The Applicable Emission Factor, (lb/1000 Gallons)/1,000

7.3 Natural Gas Fired Boiler

7.3.1 Description

Natural gas fired boiler rated at 20.9 mmBtu/hr used to provide heat in Carman Hall. The boiler was constructed in 1969.

7.3.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Description                                    | Emission Control Equipment |
|---------------|--|----------------------------|
| Carman Boiler | Natural Gas Fired Boiler Rated at 20.9 MBtu/hr | None                       |

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected boiler" for the purpose of these unit-specific conditions, is the gas boiler described in Condition 7.3.1 and 7.3.2.
- b. The affected boiler is subject to the emission standards identified in Condition 5.2.2.
- c. The affected boiler is subject to 35 IAC 216.121:

No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.3.4 Non-Applicability of Regulations of Concern

None

7.3.5 Operational and Production Limits and Work Practices

- a. Natural gas shall be the only fuel fired in the affected boiler.
- b. At all times the Permittee shall to the extent practicable maintain and operate the affected boiler in a manner consistent with good air pollution control practice for minimizing emissions.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected boiler is subject to the following:

Emissions from the affected boiler shall not exceed the following limits:

| Pollutant | Emissions Ton/yr |
|-----------|------------------|
|           |                  |

|                 |     |
|-----------------|-----|
| SO <sub>2</sub> | 0.1 |
|-----------------|-----|

These limits are based on maximum firing rate and maximum hours of operation [T1R].

The above limitation revises limitations established in Permit 75040132, pursuant to PSD. The limitations were revised by replacing the limitation for NO<sub>x</sub> and CO with a limitation for SO<sub>2</sub> [T1R].

7.3.7 Testing Requirements

- a. Within 90 days of a written request from the Illinois EPA, the Permittee shall have emissions tests conducted for NO<sub>x</sub> or CO as specified by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act. The Illinois EPA may provide additional time for the performance on these tests upon written request by the Permittee.

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Conditions 5.5.1 and 7.3.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Natural gas usage for the affected boiler (ft<sup>3</sup>/yr);
- b. Annual SO<sub>2</sub> emissions from the affected boiler, (tons/year) based on fuel consumption and the applicable emission factors, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall notify the Illinois EPA in 30 days of deviations of the affected boiler with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Emissions of SO<sub>2</sub> from the affected boiler in excess of the limits specified in Condition 7.3.6.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

None

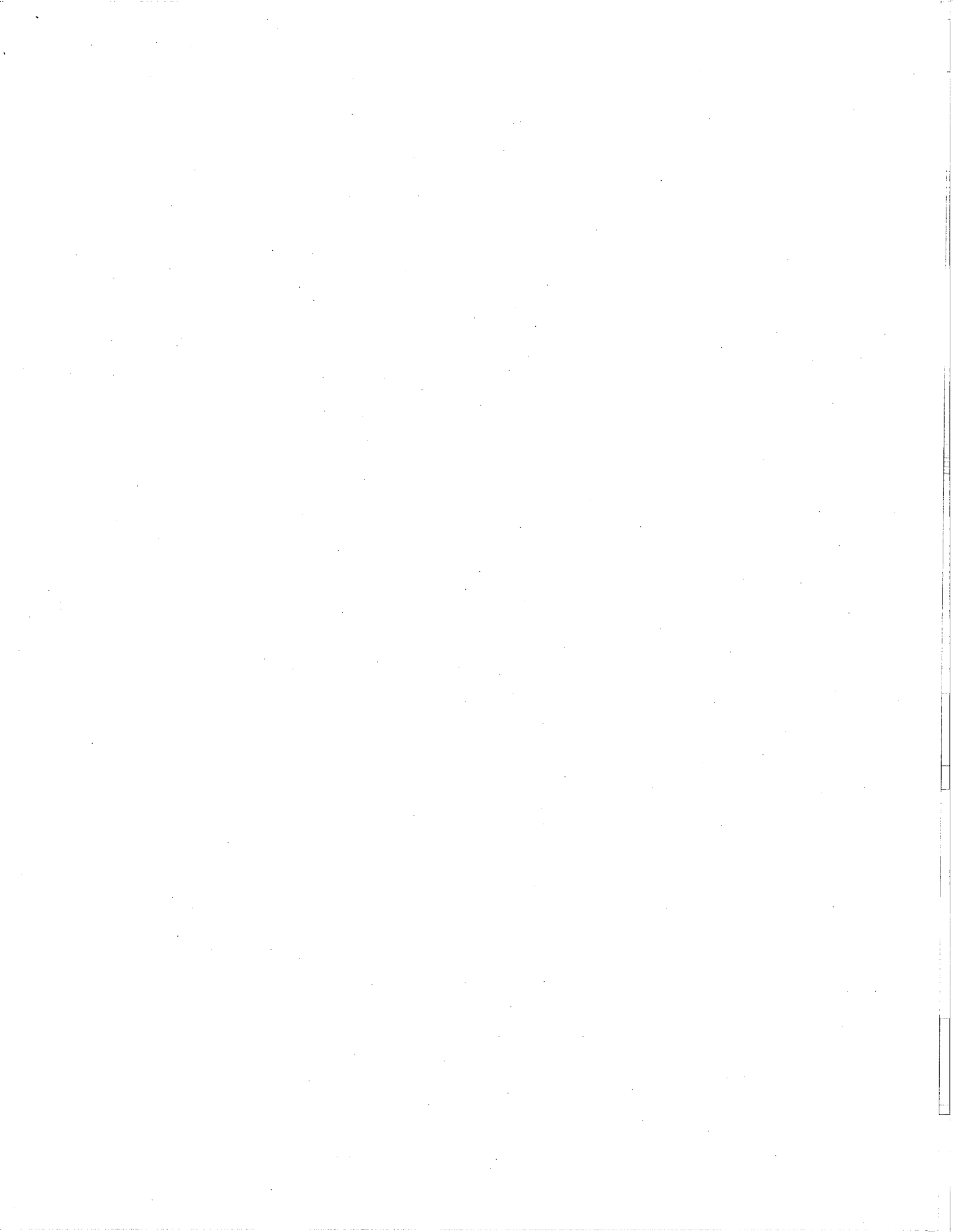
7.3.12 Compliance Procedures

- a. Compliance with the Condition 5.5.1 and 7.3.6 shall be based on the recordkeeping requirements in Condition 7.3.9 and appropriate emission factors.

| Pollutant       | Emission Factor<br>(lb/million scf) |
|-----------------|-------------------------------------|
| NO <sub>x</sub> | 100                                 |
| CO              | 84                                  |
| PM              | 7.6                                 |
| VOM             | 5.5                                 |
| SO <sub>2</sub> | 0.6                                 |

The above standard emission factors are for small boilers (less than 100 mmBtu) combusting natural gas, as found in AP-42, Chapter 1.4, Tables 1.4-1 and 1.4-2.

- b. Compliance with Condition 7.3.3(b) and (c) is addressed by the work practices inherent in operation of a natural gas-fired boiler (Condition 7.3.5). No further compliance procedures are set in this permit addressing these regulations.





7.4 Gasoline Tank

7.4.1 Description

6,000 gallon gasoline storage tank used to deliver gasoline to fleet vehicles.

7.4.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit         | Description                        | Emission Control Equipment |
|-----------------------|------------------------------------|----------------------------|
| Gasoline Storage Tank | 6,000 Gallon Gasoline Storage Tank | Submerged Loading          |

7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected gasoline tank" for the purpose of these unit-specific conditions, is the gasoline tank described in Condition 7.4.1 and 7.4.2.
- b. The affected gasoline tank is subject to the emission limits identified in Condition 5.2.
- c. The affected gasoline tank is subject to 35 IAC 215.122(b), which provides that:

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, submerged fill or an equivalent device approved by the Illinois EPA. [35 IAC 215.122(b)]

If no odor nuisance exists the limitations of the above shall only apply to the loading of volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater of 294.3°K (70°F). [35 IAC 215.122(c)]

Note: At the time of issuance of this permit, the Illinois EPA has not approved the use of other equivalent equipment in lieu of a submerged loading pipe or submerged loading fill.

"Submerged loading pipe", for purposes of the above is defined in 35 IAC 211.6470(a).

7.4.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected gasoline tank not being subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels, 40 CFR Part 60, Subpart Kb because the

affected gasoline tank does not have a capacity greater than 10,566 gallons.

- b. This permit is issued based on the affected gasoline tank not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected gasoline tank does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.4.5 Operational and Production Limits and Work Practices

- a. The affected gasoline tank shall be loaded via a permanent submerged loading pipe or equivalent device approved by the Illinois EPA.

7.4.6 Emission Limitations

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

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6 and 7.4.3, the Permittee shall maintain records of the following items for the affected gasoline tank to demonstrate compliance with Conditions 5.5.1, 7.4.3 and 7.4.6 pursuant to Section 39.5(7)(b) of the Act:

- a. The throughput of the affected gasoline tank (gallons/yr).

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected gasoline tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.4.3, 7.4.5, or 7.4.6. The notification shall include:
  - i. Identification of the limit that may have been exceeded.
  - ii. Duration of the possible exceedance.

- iii. An estimate of the amount of emissions in excess of the applicable standard.
  - iv. A description of the cause of the possible exceedance.
  - v. When compliance was reestablished.
- b. The Permittee shall submit the following information along with its annual emission report:
- i. A summary of exceedances of the limits in Conditions 7.4.3 and 7.4.6, if any, which require notification to the Compliance Section in accordance with Condition 7.4.10(a).

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected boiler without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.4.12 Compliance Procedures

Compliance with Condition 5.5 shall be determined using the recordkeeping requirements of Condition 7.4.9 and the following emission factors:

- a. For the purpose of estimating VOM emissions from storage tanks, the most current version of the USEPA TANKS program is acceptable.
- b. Compliance with Condition 7.4.3(c) is assured as long as the Permittee meets the operating requirements of Condition 7.4.5

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after October 10, 2003 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

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

#### 8.4.2 Changes Requiring Prior Notification

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

- a. The changes do not violate applicable requirements;

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

#### 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

#### 8.6 Reporting Requirements

##### 8.6.1 Monitoring Reports

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

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

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

#### 8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

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

- a. The name and identification of the affected unit(s);

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

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
  - i. Illinois EPA - Air Compliance Section
    - Illinois Environmental Protection Agency
    - Bureau of Air
    - Compliance Section (#40)
    - P.O. Box 19276
    - Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Regional Field Office
    - Illinois Environmental Protection Agency
    - Division of Air Pollution Control
    - 2009 Mall Street
    - Collinsville, Illinois 62234
  - iii. Illinois EPA - Air Permit Section (MC 11)
    - Illinois Environmental Protection Agency
    - Division of Air Pollution Control
    - Permit Section
    - P.O. Box 19506
    - Springfield, Illinois 62794-9506
  - iv. USEPA Region 5 - Air Branch
    - USEPA (AE - 17J)
    - Air & Radiation Division
    - 77 West Jackson Boulevard
    - Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois

EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.



9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

### 9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6) (c) of the Act].

### 9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

### 9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7) (o) (vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

## 9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7) (a) and (p) (ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.

- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

#### 9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

#### 9.5 Liability

##### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

##### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

##### 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

##### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

##### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

#### 9.6 Recordkeeping

##### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

#### 9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

#### 9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

#### 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

#### 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
  - ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

#### 9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(c)(iii) of the Act].

##### 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

##### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

##### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing

to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_



## 10.2 Attachment 2 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

### 1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
- Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.

### 2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and

- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency  
 Division Of Air Pollution Control -- Permit Section  
 P.O. Box 19506  
 Springfield, Illinois 62794-9506

|   |                                  |
|---|----------------------------------|
| <b>Application For Construction Permit (For CAAPP Sources Only)</b> | <b>For Illinois EPA use only</b> |
|   | I.D. number:                     |
|   | Permit number:                   |
| Date received:  |                                  |

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

| Source Information  |            |                 |  |
|---|------------|-----------------|--|
| 1. Source name:   |            |                 |  |
| 2. Source street address:   |            |                 |  |
| 3. City:  |            | 4. Zip code:    |  |
| 5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No |            |                 |  |
| 6. Township name:   | 7. County: | 8. I.D. number: |  |

| Owner Information |            |               |
|-------------------|------------|---------------|
| 9. Name:          |            |               |
| 10. Address:      |            |               |
| 11. City:         | 12. State: | 13. Zip code: |

| Operator Information (if different from owner) |            |               |
|--|------------|---------------|
| 14. Name                                       |            |               |
| 15. Address:                                   |            |               |
| 16. City:                                      | 17. State: | 18. Zip code: |

| Applicant Information   |  |
|---|--|
| 19. Who is the applicant?<br><input type="checkbox"/> Owner <input type="checkbox"/> Operator | 20. All correspondence to: (check one)<br><input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source |
| 21. Attention name and/or title for written correspondence:                                   |  |
| 22. Technical contact person for application:   | 23. Contact person's telephone number:   |

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

### Summary Of Application Contents

|   |  |
|---|--|
| 24. Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs:<br>a) Non-attainment New Source Review – 35 IAC Part 203;<br>b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21;<br>c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?  | <input type="checkbox"/> Yes <input type="checkbox"/> No   |
| 25. Does the application identify and address all applicable emissions standards, including those found in the following:<br>a) Board Emission Standards – 35 IAC Chapter I, Subtitle B;<br>b) Federal New Source Performance Standards – 40 CFR Part 60;<br>c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?  | <input type="checkbox"/> Yes <input type="checkbox"/> No   |
| 26. Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?  | <input type="checkbox"/> Yes <input type="checkbox"/> No   |
| 27. Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?  | <input type="checkbox"/> Yes <input type="checkbox"/> No   |
| 28. Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA?<br>Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information. | <input type="checkbox"/> Yes <input type="checkbox"/> No   |
| 29. If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><br><input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application |

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

### Signature Block

|  |                                   |
|--|-----------------------------------|
| This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.   |                                   |
| 30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.<br>Authorized Signature: |                                   |
| BY: _____<br><br>AUTHORIZED SIGNATURE  | _____<br><br>TITLE OF SIGNATORY   |
| _____<br><br>TYPED OR PRINTED NAME OF SIGNATORY  | _____ / _____ / _____<br><br>DATE |

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.4 Attachment 4 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7.
  - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.
  - b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee

form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

MVH:jar