

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

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 ELECTRONIC MAIL)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board an **ENTRY OF APPEARANCE OF KATHERINE D. HODGE, ENTRY OF APPEARANCE OF MONICA T. RIOS** and The Premcor Refining Group Inc.'s **PETITION FOR REVIEW** and **MOTION TO STAY EFFECTIVENESS OF CAAPP PERMIT**, copies of which are herewith served upon you.

Respectfully submitted,

THE PREMCOR REFINING GROUP INC.,
Petitioner,

Dated: October 24, 2006

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

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

CERTIFICATE OF SERVICE

I, Katherine D. Hodge, the undersigned, certify that I have served the attached
ENTRY OF APPEARANCE OF KATHERINE D. HODGE, ENTRY OF
APPEARANCE OF MONICA T. RIOS, PETITION FOR REVIEW and MOTION TO
STAY EFFECTIVENESS OF CAAPP PERMIT upon:

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

via electronic mail on October 24, 2006; and upon:

Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

by depositing said documents in the United States Mail in Springfield, Illinois, postage
prepaid, on October 24, 2006.

/s/ Katherine D. Hodge
Katherine D. Hodge

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

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, THE PREMCOR REFINING GROUP INC., in the above-referenced matter.

Respectfully submitted,

THE PREMCOR REFINING GROUP INC.,
Petitioner,

By: /s/ Katherine D. Hodge
Katherine D. Hodge

Dated: October 24, 2006

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

PREM:013/Fil/EOA-KDH

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

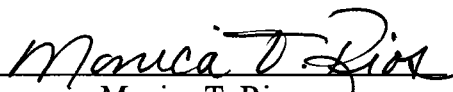
THE PREMCOR REFINING)	
GROUP INC.,)	
)	
Petitioner,)	
)	
v.)	PCB ____ - ____
)	(CAAPP Permit Appeal)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

ENTRY OF APPEARANCE OF MONICA T. RIOS

NOW COMES Monica T. Rios, of the law firm of HODGE DWYER ZEMAN,
and hereby enters her appearance on behalf of Petitioner, THE PREMCOR REFINING
GROUP INC., in the above-referenced matter.

Respectfully submitted,

THE PREMCOR REFINING GROUP INC.,
Petitioner,

By: 
Monica T. Rios

Dated: October 24, 2006

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

PREM:013/Fil/EOA-MTR

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

PETITION FOR REVIEW

NOW COMES, Petitioner, THE PREMCOR REFINING GROUP INC. (hereinafter "Premcor"), by and through its attorneys, HODGE DWYER ZEMAN, pursuant to Section 40.2 of the Illinois Environmental Protection Act (415 ILCS 5/40.2) ("Act") and 35 Ill. Admin. Code § 105.Subpart C, and petitions the Illinois Pollution Control Board ("Board") for review of the Clean Air Act Permit Program ("CAAPP") permit granted to Premcor by the Illinois Environmental Protection Agency ("Illinois EPA") pursuant to Section 39.5 of the Act on September 19, 2006.

In support thereof, Premcor states as follows:

1. Premcor owns and operates a petroleum bulk storage and loading terminal in Hartford, Illinois ("Hartford Terminal"), which is classified as a "major source" for purposes of Title V of the federal Clean Air Act, 42 U.S.C. §§ 7401, *et seq.*, and Section 39.5 of the Act, 415 ILCS 5/39.5.
2. Pursuant to Section 504 of the Clean Air Act, 42 U.S.C. § 7661b(c), and Section 39.5(5) of the Act, Premcor submitted an application for a CAAPP permit for its Hartford Terminal to the Illinois EPA on March 7, 1996.

3. A draft CAAPP permit was issued by Illinois EPA on May 27, 2004, and Illinois EPA honored a request for a public hearing that was received by Illinois EPA during the ensuing public comment period. This public hearing was held on July 13, 2004; therefore, the public comment period was extended until August 12, 2004. *See* IEPA Air Pollution Control Permit Record available at http://yosemite.epa.gov/r5/il_permt.nsf/2f3e96d539c4a2a28625666b0063b9a1/a2ad6a11912f5a862565bd006d5777!OpenDocument&Highlight=0,premcor (Oct. 24, 2006) (hereinafter "IEPA Permit Record").

4. On August 2, 2004, during the above-referenced comment period, Premcor submitted comments (attached hereto as Exhibit A) on the May 27, 2004 draft permit.

5. Thereafter, on August 26, 2004, Premcor submitted a letter (attached hereto as Exhibit B) intended to answer certain questions posed by the American Bottom Conservancy regarding the May 27, 2004 draft permit.

6. On April 3, 2006, Premcor further provided comments (attached hereto as Exhibit C) in response to the Illinois EPA's request for confirmation of the storage tanks at the Hartford Terminal.

7. On August 3, 2006, Illinois EPA issued its "Project Summary for the Draft Clean Air Act Program (CAAPP) Permit" ("Project Summary") (attached hereto as Exhibit D) for the Hartford Terminal. Illinois EPA stated that "[a]fter a review of Premcor's application, . . . [it] made a preliminary determination that the application met the standards for issuance of a CAAPP permit." *See* Project Summary at 10. Illinois

EPA, however, failed to address the comments that Premcor had submitted regarding the May 27, 2004 draft permit.

8. On or about August 3, 2006, the Illinois EPA submitted a draft CAAPP permit for the Hartford Terminal to the United States Environmental Protection Agency (“USEPA”) for its review. *See* IEPA Permit Record.

9. In addition, during the time that elapsed between issuance of the initial draft CAAPP permit for the public comment period (May 2004) and the submission of a subsequent draft permit (August 2006) to USEPA for review, Premcor applied for and received several construction permits for the Hartford Terminal. Construction permit #04070052 (attached hereto as Exhibit E) allowed the storage and loading of ethanol and toluene at the terminal, permit #05030053 (attached hereto as Exhibit F) allowed the installation of 19 Lube Cube containers, and permit #05120034 (attached hereto as Exhibit G) allowed the installation of an on-site SVE system.

10. On September 19, 2006, Illinois EPA granted a final CAAPP permit (attached hereto as Exhibit H) for the Premcor Hartford Terminal. However, the Illinois EPA failed to make certain changes to the CAAPP permit, as requested by Premcor, as incorporated by reference below. In addition, the Illinois EPA failed to appropriately incorporate provisions from the construction permits referenced above, ultimately resulting in duplicative and inconsistent requirements.

11. Premcor hereby incorporates by reference the comments (attached hereto as Exhibits A, B, and C) submitted to the Illinois EPA regarding the May 2004 draft permit.

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

WHEREFORE, Petitioner, THE PREMCOR REFINING GROUP INC. petitions the Illinois Pollution Control Board for a hearing on the Illinois EPA’s action to issue this CAAPP permit in this fashion. And, as set forth in the accompanying Motion to Stay Effectiveness of CAAPP Permit, THE PREMCOR REFINING GROUP INC. requests that the effectiveness of the CAAPP permit be stayed until the Board’s final determination in this matter.

Respectfully submitted,

THE PREMCOR REFINING GROUP INC.,
Petitioner,

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

Dated: October 24, 2006

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

PREM:013/Fil/Petition for Review V.2

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

THE PREMCOR REFINING)	
GROUP INC.,)	
)	
Petitioner,)	
)	
v.)	PCB No. ____ - ____
)	(CAAPP Permit Appeal)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

MOTION TO STAY EFFECTIVENESS OF CAAPP PERMIT

NOW COMES, Petitioner, THE PREMCOR REFINING GROUP INC.

(hereinafter "Premcor"), by and through its attorneys, HODGE DWYER ZEMAN, and hereby moves the Illinois Pollution Control Board ("Board") to stay the effectiveness of Premcor's Clean Air Act Permit Program ("CAAPP") permit in this matter, pursuant to 35 Ill. Admin. Code § 105.304(b).

In support thereof, Premcor states as follows:

1. On September 19, 2006, the Illinois Environmental Protection Agency ("Illinois EPA") issued a final CAAPP permit (No. 96030082) for Premcor's petroleum bulk storage and loading terminal in Hartford, Illinois.
2. Today, October 24, 2006, Premcor 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 Premcor and to protect Premcor's certain and clearly ascertainable right to appeal permit conditions.

4. The Board has determined that the Administrative Procedure Act's, 5 ILCS 100/1, *et seq.*, provisions require, upon a party's request, a stay of a CAAPP permit's effectiveness during an appeal of its conditions. *See Dynegy Midwest Generation, Inc. v. IEPA*, PCB No. 06-74 at 8 (Ill.Pol.Control.Bd. Feb. 16, 2006) (citing *Borg-Warner Corp. v. Mauzy*, 100 Ill. App. 3d 862, 427 N.E. 2d 415 (3d Dist. 1981))(holding that under Section 10-65(b) of the APA "a stay of the effectiveness of a renewal permit is required" and that the "original permit continues in effect until final action on the application by the administrative bodies charged with making the determination"); *see also Dynegy Midwest Generation, Inc. (Havana Power Station) v. IEPA*, PCB No. 06-71 at 8 (Ill.Pol.Control.Bd. Feb. 16, 2006); *Dynegy Midwest Generation, Inc. (Hennepin Power Station) v. IEPA*, PCB No. 06-72 at 8 (Ill.Pol.Control.Bd. Feb. 16, 2006); other similar cases are at PCB Nos. 06-55 through 06-75 and PCB No. 07-146.

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

WHEREFORE, the Petitioner, THE PREMCOR REFINING GROUP INC.,
moves the Illinois Pollution Control Board to grant a stay of effectiveness of Premcor's
CAAPP permit until the Board's final action in this matter.

Respectfully submitted,

THE PREMCOR REFINING GROUP INC.,
Petitioner,

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

Dated: October 24, 2006

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

PREM:013\Fil\Motion to Stay



Premier People,
Products and Service

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

August 2, 2004

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

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

Dear Mr. Frost:

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

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

Sincerely,

THE PREMCOR REFINING GROUP INC.

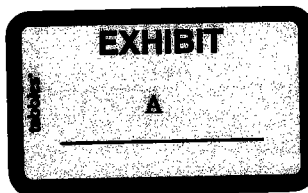
Rebecca Malloy
Environmental Specialist

Enclosures: Comments on the Draft Permit
Supplement to CAAPP Application

FILE NUMBER 170.01.02

cc: Mr. Sunil Suthar, IEPA
Mr. Ed Jacoby, Premcor
Mr. Tony Schroeder, Trinity Consultants

RETAIN IN FILE UNTIL 170.01.02



The Premcor Refining Group Inc.
Hartford Distribution Center

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

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

The Premcor Refining Group Inc.
Hartford Distribution Center

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

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

The Premcor Refining Group Inc.
 Hartford Distribution Center

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

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



Premier People,
Products and Services

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

August 26, 2004

FILE NUMBER 170.01.02

RETAIN IN FILE UNTIL _____

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

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

Dear Mr. Suthar:

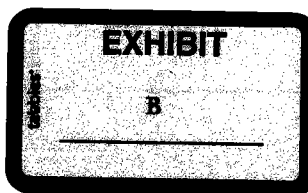
This letter is intended to answer questions concerning The Premcor Refining Group Inc's (Premcor) draft Title V operating permit for the Hartford Distribution Center (PHDC) posed by the American Bottom Conservancy (ABC) in a letter (dated 8/12/04) addressed to Mr. Charles Matoesian of the Illinois Environmental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

ABC comment #1:

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

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

Premcor response:



Mr. Sunil Suthar – August 26, 2004
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A complete, up-to-date list of tanks owned and operated by Premcor at PHDC has been provided to IEPA as a part of the Supplement to CAAPP Application that was submitted by Premcor in July 2004. The Supplement also includes a list of materials associated with each tank.

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

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

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

ABC comment #2:

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

Premcor response:

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

ABC comment #3:

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

Premcor response:

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

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

Condition 9.14.)

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

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

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

ABC comment #4:

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

Premcor response:

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

ABC comment #5:

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

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

Mr. Sunil Suthar – August 26, 2004
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Premcor response:

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

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

ABC comment #6:

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

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

Premcor response:

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

ABC comment #7:

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

Premcor response:

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

ABC comment #8:

Mr. Sunil Suthar – August 26, 2004
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P. 70: In view of the fact that the Hartford area has a pool of petroleum/gasoline products floating in the groundwater, whose fumes migrate into the homes of Hartford residents and have caused explosions—AND, that no state or federal agency is inspecting the tanks that are the subject of this permit, we asked Premcor if they would share the API tank inspection reports with us. Mr. Mulkey asked, but reported in his phone call to us that the company declined, because of pending lawsuits. Surely, there must be some action the Agency or EPA could take that would allow them to inspect these tanks. At a minimum, the fact that Premcor did not disclose the tank inspection reports should be noted in the permit and it should be made clear that the permit shield does not cover any tank breakdowns and malfunctions attributable to structural problems.

Premcor response:

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

ABC comment #9:

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

Premcor response:

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

ABC comment #10:

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

Premcor response:

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

ABC comment #11:

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

Mr. Sunil Suthar – August 26, 2004
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clarification. It was indicated at the hearing that Premcor has an NPDES permit for the facility. Please provide us with the permit number and expiration date.

Premcor response:

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

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

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

ABC comment #12:

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

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

Premcor response:

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

ABC comment #13:

Mr. Sunil Suthar – August 26, 2004
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We are concerned that Premcor is not required to keep a detailed record of HAPS emissions. We also request this condition, taken from another permit, to be added:

5.6.2 Records for VOM and HAP Emissions The Permittee shall maintain records of the following items to verify that the source is not a major source for HAP emissions and therefore not subject to 40 CFR 63Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) and to quantify annual VOM emissions, so as to demonstrate compliance with the limits in Condition 5.5:a. General Records: i. The identification and properties of each organic liquid stored at the source, as related to emissions, i.e., vapor pressure and molecular weight; ii. The vapor weight percent of each HAP in the organic material emissions for each liquid determined as the average over the annual range of storage temperature and representative data on the composition of the liquid, with identification of supporting documentation, e.g., USEPA 1992 survey; and FINAL DRAFT/PROPOSED CAAPP RENEWAL PERMIT Equilon Enterprises, LLC.I.D. No.: 197810AAA Application No.: 95060055 March 26, 2004.

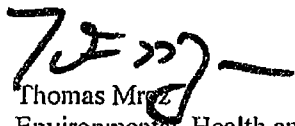
Premcor response:

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

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

Sincerely,

THE PREMCOR REFINING GROUP INC.


Thomas Mroz

Environmental, Health and Safety Engineer

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



John Tenison, PG – HSE Manager
 Logistics Operations and Development

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

April 3, 2006

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

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

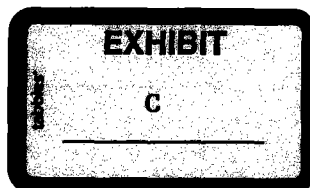
**RE: Updated List of Storage Tanks
 The Premcor Refining Group Inc.
 Premcor Hartford Distribution Center
 Source ID: 119050AAA**

Dear Mr. Suthar:

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

TABLE 1. CURRENT PRODUCT STORAGE TANKS

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



Mr. Sunil Suthar
Page 2
April 3, 2006

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

TABLE 2. TANKS REMOVED OR TO BE REMOVED

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

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

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

Sincerely,



John Tenison

Mr. Sunil Suthar
Page 3
April 3, 2006

cc: Steve Haug
Andy Szabo
Massoud Modarres
Tony Schroeder – Trinity Consultants
File

O:\VLD - Logistics Operations & Development\EV - Environmental Services\EV-12-00 Terminals\Product Terminals (PT)\HRT -
Hartford\42 Title V Operating Permit\Storage Tank List ltr 04-03-06.doc

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR
DIVISION of AIR POLLUTION CONTROL
PERMIT SECTION

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

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

Illinois EPA ID Number: 119050AAA

Application Number: 96030082

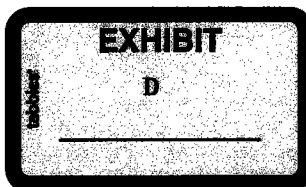
Application Type: Initial Permit

Start of Public Comment Period: May 27, 2004

Close of Public Comment Period: August 12, 2004

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

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



I. INTRODUCTION

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

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

II. EMISSION UNITS

Significant emission units at this source are as follows:

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

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

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

III. EMISSIONS

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

Permitted Emissions of Regulated Pollutants

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

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

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

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

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

IV. APPLICABLE EMISSION STANDARDS

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

V. PROPOSED CAAPP PERMIT

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

Non-Applicability Statements

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

Unit 01: Vapor Control System

None

Unit 02: River Dock (Marine Vessel Loading):

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

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

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

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

Unit 03: External Floating Roof Storage Tanks:

None

Unit 04: Internal Floating Roof Storage Tanks:

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

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

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

Unit 05: Wastewater Treatment System and Thermal Oxidizer:

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

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

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

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

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

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

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

Unit 08: Gasoline Storage Wells

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

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

Unit 09: Lube Cubes

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

Unit 11: Soil Vapor Extraction System

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

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

Permit Streamlining Discussion

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

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

Periodic Monitoring

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

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

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

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

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

Prompt Reporting

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

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

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

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

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

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

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

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

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

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

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

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

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

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

VI. REQUEST FOR COMMENTS

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

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

VII. RESPONSE TO COMMENTS

General Oversight / Compliance

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

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

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

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

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

Ambient Air Quality

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

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

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

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

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

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

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

and three precursors/promoters of criteria air pollutants:

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

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

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

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

Vapor Control System comments

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

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

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

Wastewater Treatment comments

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

Storage Tanks comments

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

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

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

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

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

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

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

Monitoring comments

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

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

RENEE CIPRIANO, DIRECTOR

217/782-2113

CONSTRUCTION PERMIT

FILE NUMBER 170.05.47.01

RETAIN IN FILE UNTIL _____

PERMITTEE

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

Application No.: 04070052

I.D. No.: 119050AAA

Applicant's Designation:

Date Received: July 19, 2004

Subject: Storage and Barge Loading of Ethanol and Toluene

Date Issued: September 29, 2004

Location: 201 East Hawthorne, Hartford

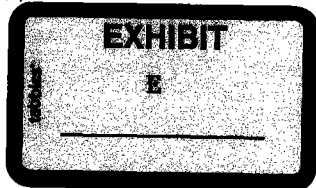
Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a project for the storage and barge loading of ethanol and toluene, as described in the above-referenced application. This Permit is subject to standard conditions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

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

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

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

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



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

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

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

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

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

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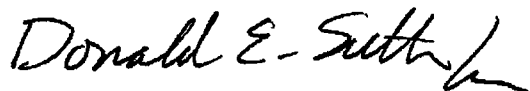
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records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

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

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

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



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

DES:JMS:psj

cc: Region 3



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

RENEE CIPRIANO, DIRECTOR

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

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

FILE NUMBER 170.01.06

RETAIN IN FILE UNTIL _____

Application No.: 05030053
Applicant's Designation:
Subject: Lube Cubes
Date Issued: June 6, 2005
Location: 201 East Hawthorne, Hartford

I.D. No.: 119050AAA
Date Received: March 14, 2005

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

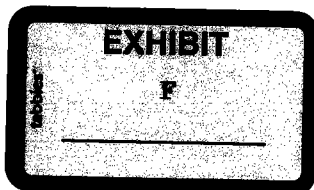
1. This permit is issued based upon negligible emissions of volatile organic material (VOM) from each lube cube. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.18 tons/year.

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

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

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

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



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

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

Donald E. Sutton

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

DES:JMS:psj

cc: Region 3



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

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

Application No.: 05120034

I.D. No.: 119050AAA

Applicant's Designation:

Date Received: December 19, 2005

Subject: Soil Vapor Extraction System

Date Issued: January 24, 2006

Location: 201 East Hawthorne, Hartford

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

1.1 Soil Vapor Extraction System

1.1.1 Description

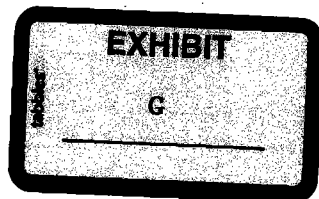
The soil vapor extraction system will be installed to extract hydrocarbon vapors present in the soil using a series of extraction wells. The system consist of a blower which will draw vapors from the wells to a thermal oxidizer.

1.1.2 List of Emission Units and Air Pollution Control Equipment

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

1.1.3 Applicable Provisions and Regulations

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



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

ii. Emissions of organic material in excess of those permitted by 35 IAC 219.301 are allowable if such emissions are controlled by thermal incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water.

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

1.1.4 Non-Applicability of Regulations of Concern

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

1.1.5 Control Requirements and Work Practices

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

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

b. The thermal oxidizer shall be in operation at all times when the affected unit is in operation and emitting air contaminants.

c. The thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation.

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

1.1.6 Production and Emission Limitations

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

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

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

1.1.7 Testing Requirements

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

1.1.8 Monitoring Requirements

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

1.1.9 Recordkeeping Requirements

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

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

1.1.10 Reporting Requirements

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

1.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected unit.

Page 5

1.1.12 Compliance Procedures

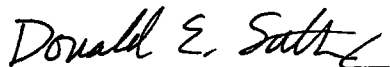
- a. Compliance with the VOM emission limit in Condition 1.1.6 shall be based on the recordkeeping requirements in Condition 1.1.9 and the following equation:

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

- b. Compliance with the NO_x and CO emission limits in Condition 1.1.6 shall be determined by appropriate emission factors and the recordkeeping requirements in Condition 1.1.9.

2. The Permittee may operate the affected unit under this construction permit until final action is taken on the Clean Air Act Permit Program (CAAPP) application for this source. If this construction permit is not incorporated into the initial CAAPP permit issued to this source, the Permittee may operate the affected unit under this construction permit until the CAAPP permit is reissued to address this unit.

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



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

DES:JMS:psj

cc: Region 3

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

The Premcor Refining Group, Inc. - Hartford Distribution Center
Attn: Becky Malloy, Environmental Contact
201 East Hawthorne
Hartford, Illinois 62048

Application No.: 96030082

I.D. No.: 119050AAA

Applicant's Designation:

Date Received: March 7, 1996

Operation of: Marine Terminal

Date Issued: September 19, 2006

Expiration Date²: September 19, 2011

Source Location: 201 East Hawthorne, Hartford, Madison County

Responsible Official: Ed Jacoby, Vice President of Wholesale, Marketing and
Distribution

This permit is hereby granted to the above-designated Permittee to OPERATE a Petroleum Bulk Storage and Loading Terminal, 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 Sunil Suthar at 217/782-2113.

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

DES:SIS:psj

cc: Illinois EPA, FOS, Region 3
CES
Lotus Notes

¹ This permit may contain 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.

² Except as provided in Condition 8.7 of this permit.

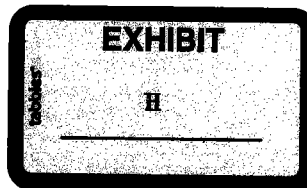


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1.0 SOURCE IDENTIFICATION

1.1 Source

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

I.D. No.: 119050AAA
Standard Industrial Classification: 5171, Petroleum Bulk Storage
and Loading

1.2 Owner/Parent Company

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

1.3 Operator

The Premcor Refining Group, Inc
201 East Hawthorne
Hartford, Illinois 62048

Bill Malloy, Environmental Contact
618/254-7301 Ext. 261

1.4 General Source Description

The Premcor Refining Group, Inc. - Hartford Distribution Center
is located at 201 East Hawthorne, Hartford, Illinois. The source
is engaged in petroleum storage and distribution operations.

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
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
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
ft ³	cubic feet
gal	gallon
HAP	Hazardous Air Pollutant
hp	horsepower
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
Kg	Kilogram
kPa	Kilopascals
kW	kilowatts
l	liter
lb	pound
m ³	cubic meters
mmBtu	Million British thermal units
mo	month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	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
psia	pounds per square inch absolute
RMP	Risk Management Plan
RVP	Reid Vapor Pressure
SO ₂	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
VPL	Volatile Petroleum Liquid
wt.	weight
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:

Chemical Storage Tank
Chemical Storage Drum

- 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 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/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)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

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)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has

not been mixed with such materials [35 IAC
201.210(a)(17)].

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

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

^a Refurbished in 1981. A new platform was constructed, a new pipeline was installed to the river dock. The loading berth was reconditioned and all new piping and loading arms installed.

^b Subject to 40 CFR 60, Subpart Kb

^c Subject to 40 CFR 60, Subpart K

^d Installation of two (2) equalization tanks

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 VOM, and CO 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 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:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.7 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. As a result of this application either not having been submitted or deemed complete by April 20, 1998, the source is required to comply with the requirements of 40 CFR Part 64 for large pollutant-specific emissions units in the initial application and CAAPP permit. The source must submit a CAM plan for all other affected pollutant-specific emissions units 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)	230.30
Sulfur Dioxide (SO ₂)	4.34
Particulate Matter (PM)	12.08
Nitrogen Oxides (NO _x)	35.56
HAP, not included in VOM or PM	----
Total	282.28

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.

5.6.2 Records for Operating Scenarios

N/A

5.6.3 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 of the source 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.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

- a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year, (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and
- b. The total annual emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year, (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

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 Unit 01: Vapor Control System
 Control: Thermal Treatment Unit (Enclosed Flare)

7.1.1 Description

Operation of a vapor control system that captures and removes hydrocarbon vapors from the vadose zone (below ground surface). The vapor control system consists of control boreholes, a knock out drum, vacuum blowers (75 hp/electric), and an enclosed flare (thermal treatment unit). All vapors from the vapor control system are routed to and through the thermal treatment unit.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Vapor Control System	Control Boreholes, Knock Out Drum, Vacuum Blowers (75 Hp/Electric)	1/92	Thermal Treatment Unit (Enclosed Flare)

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected vapor control system" for the purpose of these unit-specific conditions, is the vapor control system described in Conditions 7.1.1 and 7.1.2.
- b. i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall apply only to photochemically reactive material [35 IAC 219.301].
- ii. Emissions of organic material in excess of those permitted by Condition 7.1.3(c) (i) are allowable if such emissions are controlled by a flame or thermal incineration (oxidizer) so as to either reduce such emissions to 10 ppm equivalent methane or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 219.302(a)].

7.1.4 Non-Applicability of Regulations of Concern

None

7.1.5 Operational and Production Limits and Work Practices

- a. The thermal treatment unit shall be operated in a smokeless condition.
- b. The thermal treatment unit shall be in operation at all times when the affected vapor recovery system is in operation and emitting air contaminants that would not comply with Condition 7.1.3 without the use of the thermal treatment unit.
- c. The thermal treatment unit combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, emissions from the flare shall not exceed the following:

Pollutant	Emissions	
	(Lb/Hr)	(T/Yr)
VOM	3.78	16.6
CO	10.00	43.8
NO _x	1.84	8.0
PM ₁₀	1.83	8.0
SO ₂	0.93	4.1

The above limitations were established in Permit 92050052, pursuant to Title I of the Clean Air Act, specifically 35 IAC Part 203, Major Stationary Sources Construction and modification and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit do not constitute a new major source or major modification pursuant to these rules [T1].

The limits are based on standard emission factors (AP-42), the heat input rate in condition 7.1.7(b), and 8760 hours/yr of operation. Compliance with annual limits shall be determined from a running total of 12 months of data [T1].

7.1.7 Operating Requirements

- a. The thermal treatment unit shall be equipped with a sensor to detect the presence of a flame [T1].

- b. Total heat input to the thermal treatment unit, including thermal treatment unit gas and contaminated air shall not exceed 27 mmBtu/hr [T1].
- c. Hydrogen Sulfide in the inlet to the thermal treatment unit shall not exceed 60 ppm [T1].
- d. The capture system and thermal treatment unit shall be operated to reduce VOM emissions by 85% so as to comply with Condition 7.1.3(c) and (d).
- e. Flowrate of contaminated air to the thermal treatment unit and hydrocarbons in the air shall not exceed 1600 SCFM and 1200 lb/hr [T1].

7.1.8 Monitoring Requirements

The thermal treatment unit shall be equipped with a sensor to detect the presence of a flame [T1].

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 vapor control system to demonstrate compliance with Conditions 5.5.1, 7.1.3, 7.1.5, 7.1.7, and 7.1.8, pursuant to Section 39.5(7)(b) of the Act:

- a. Thermal oxidizer combustion chamber temperature (continuous);
- b. VOM and HAP emissions (lb/month); and
- c. Record of time periods when the flare flame is extinguished.

7.1.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected vapor control system 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.
- b. The Permittee shall submit an annual report of emissions listed in Condition 7.1.6 with supporting calculations. The report shall include a summary of time periods when the thermal treatment unit flame was extinguished.

- c. The Illinois EPA shall be notified of permanent shutdown of the system. Notifications shall be sent to the Illinois EPA's Regional office in Collinsville (see Condition 8.6.4(ii)).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the requirements of Condition 7.1.3(c) and (d) (35 IAC 219.141 and 219.302) is assured by compliance with the operational requirements of Condition 7.1.5, the monitoring requirements of Condition 7.1.8 and the recordkeeping requirements in Condition 7.1.9.

- 7.2 Unit 02: River Dock (Marine Vessel Loading)
 Control: Vapor Recovery Unit (for Low-Vapor Pressure Materials)
 and Flare (for High-Vapor Pressure Materials)

7.2.1 Description

The marine vessel loading terminal (river dock) delivers high-vapor pressure materials (e.g. gasoline products, naphtha, and rerun materials) and low-vapor pressure materials to marine vessels that operate along the Mississippi River. The river dock consists of two (2) loading berths, and can deliver product to a barge vessel at each of the berths simultaneously.

The loading apparatus is equipped with a vapor recovery hose positioned at the marine vessel loading positions for hook up to the flare. The vapor hose and associated piping transports the hydrocarbon-enriched air displaced from the marine vessels during loading to a liquid seal knockout vessel and then to the flare.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Modified	Emission Control Equipment
Unit 02	Marine Vessel Loading	1981*	Vapor Recovery Unit and Flare

* Refurbished in 1981. A new platform was constructed, a new pipeline was installed to the river dock. The loading berth was reconditioned and all new piping and loading arms installed.

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected marine vessel loading operation" for the purpose of these unit-specific conditions, is the operation as described in Conditions 7.2.1 and 7.2.2.
- b. The affected marine vessel loading operation is subject to 35 IAC Part 219, Subpart GG: Marine Terminals since the source is engaged in delivering high-vapor pressure materials to marine vessels.

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected marine vessel loading operation is not subject to 35 IAC 219.122, which requires a submerged loading pipe when loading a volatile organic liquid (VOL) with a vapor pressure greater than 2.5 psia, because the rule is only relevant to loading operations for railroad tank car, tank truck, trailer, or stationary tank; the affected marine

vessel loading operation is only engaged in the loading of marine vessels.

- b. The affected marine vessel loading not subject to 35 Ill. Adm. Code 219.120, Control Requirements for Storage Containers of VOL per 35 Ill. Adm. Code 219.119, which states that limitations of 35 Ill. Adm. Code 219.120 do not apply to vessels permanently attached to trucks, railcars, barges, or ships [35 Ill. Adm. Code 219.119(d)].
- c. The affected marine vessel loading are not subject to 40 CFR 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals, since the affected marine vessel loading does not deliver liquid product into gasoline tank trucks as required for applicability.
- d. The affected marine vessel loading operations are not subject to 40 CFR 63, Subpart Y, National Emission Standards for Marine Tank Vessel Tank Loading Operations, since the facility has opted to accept a limit for total loading of high-vapor pressure materials to marine vessels to no greater than 9.5 million barrels per year; the rule requires 10 million barrels or 200 million barrels per year for applicability.

7.2.5 Control Requirements and Operational Limitations

- a. The affected marine vessel loading operations shall utilize vapor collection and control system to control VOM emissions from the marine terminal while loading gasoline and crude oil, so as to comply with 35 Ill. Adm. Code Part 219 Subpart GG.
- b. Pursuant to 35 Ill. Adm. Code 219.762(a), this vapor collection and control system shall meet the following requirements:
 - i. Capture the vapors displaced during the loading event and reduce overall VOM emissions by at least 95% by weight through the flare [35 Ill. Adm. Code 219.762(a)(1)].
 - ii. Be maintained and operated so that it prevents visible liquid leaks, significant odors, and visible fumes in the liquid transfer and the vapor collection lines, and appurtenances during loading [35 Ill. Adm. Code 219.762(a)(2)].
 - iii. Be certified as required by Coast Guard regulations found at 33 CFR 154 [35 Ill. Adm. Code 219.762(a)(3)].

- c. Pursuant to 35 Ill. Adm. Code 219.762(b), during the regulatory control period, gasoline or crude oil shall only be loaded into marine vessels that are:
 - i. Equipped with vapor collection equipment that has been certified as required by Coast Guard regulations found at 46 CFR 39 [35 Ill. Adm. Code 219.762(b)(1)].
 - ii. Connected to the vapor collection system [35 Ill. Adm. Code 219.762(b)(2)]
 - iii. Vapor-tight as described in 35 Ill. Adm. Code 219.762(b)(3)(A), (b)(3)(B), (b)(3)(C), or (b)(3)(D) [35 Ill. Adm. Code 219.762(b)(3)].
- d. Total loading of high vapor pressure materials to marine vessels is limited to no greater than 9.5 million barrels per year.

7.2.6 Emission Limitations

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

7.2.7 Testing and Monitoring Requirements

- a. Pursuant to 35 Ill. Adm. Code 219.766, the Permittee shall comply with the requirements regarding detection and repair of leaks of 35 Ill. Adm. Code 219.445 for all equipment associated with the vapor collection and control system, including (see Section 7.7 for further details):
 - i. Develop a monitoring program plan consistent with the provisions of 35 Ill. Adm. Code 219.446;
 - ii. Conduct a monitoring program consistent with the provisions of 35 Ill. Adm. Code 219.447;
 - iii. Record all leaking components which have a volatile organic material concentration exceeding 10,000 ppm consistent with the provisions of 35 Ill. Adm. Code 219.448;
 - iv. Identify each component consistent with the monitoring program plan submitted pursuant to 35 Ill. Adm. Code 219.446;
 - v. Repair and retest the leaking components as soon as possible within 22 days after the leak

- is found, but no later than June 1 for the purposes of 35 Ill. Adm. Code 219.447(a)(1), unless the leaking components cannot be repaired until the unit is shut down for turnaround; and
- vi. Report to the Illinois EPA consistent with the provisions of 35 Ill. Adm. Code 219.449.
 - b. Compliance with 35 IAC Section 219.762(a)(2) of this Subpart shall be determined by visual inspection and by the leak detection methods contained in Section 219.105(g) of this Part.
 - c. If the control device used to comply with 35 IAC Section 219.762(a)(1) of this Subpart is a flare, compliance shall be determined by methods described in 35 IAC Section 219.429(c).
 - d. Compliance with 35 IAC Section 219.762(b)(3) of this Subpart shall be determined by one of the methods described in this Section:
 - i. A marine vessel loaded in accordance with 35 IAC Section 219.762(b)(3)(A) of this Subpart through the use of a vacuum assisted vapor collection system is assumed to be vapor-tight for the purposes of this Subpart.
 - ii. A vapor-tightness test for marine vessels shall be conducted to include the final 20 percent of loading of each product tank of the marine vessel, and it shall be applied to any potential sources of vapor leaks on the vessel pursuant to Method 21 of 40 CFR 60, Appendix A, incorporated by reference at 35 IAC Section 219.112 of this Part. A reading of 10,000 ppmv or greater as methane shall constitute a leak.
 - iii. As an alternative to subsection (d)(2) of this Section, an owner or operator of a marine terminal may use the vapor-tightness test described in 40 CFR 61.304(f), incorporated by reference at 35 IAC Section 219.112 of this Part.
 - f. When in the opinion of the Agency or USEPA it is necessary to conduct testing to demonstrate compliance with or verify effectiveness of the vapor collection and control system required by 35 IAC Section 219.762(a), (c)(1), or (c)(3) of this Subpart, the owner or operator of a marine terminal shall, at its own expense, conduct such tests in

accordance with the applicable test methods and procedures specified in subsections (a), (b), or (c) of this Section, as applicable.

- g. An owner or operator of a marine terminal planning to conduct a VOM emissions test to demonstrate compliance with 35 IAC Sections 219.762(a), (c)(1), or (c)(3) of this Subpart shall notify the Agency of that intent not less than 30 days before the planned initiation of the tests so that the Agency may observe the test

7.2.8 Inspection and Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

- a. General Recordkeeping

The Permittee shall maintain records of the following for each affected marine vessel loading operations to demonstrate compliance with Conditions 5.5.1, 7.2.3, and 7.2.6:

- i. The identification and properties of each organic liquid distributed through each affected loading rack, as related to emissions, i.e., vapor pressure and molecular weight;
- ii. The amount of each organic liquid distributed through each affected loading rack, gallons per month and gallons per year, with annual records updated each month by totaling the throughput for that month plus the preceding 11 months;
- iii. The number of components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or gas service, as applicable;
- iv. Emissions of VOM attributable to loading of petroleum products, tons/month and tons/year, with supporting calculations, calculated utilizing an approved USEPA methodology, such as Section 5.2 of the AP-42 and the control efficiency of a VRU as demonstrated in the most recent test, with annual records updated each month by totaling the throughput for that month plus the preceding 11 months (See Condition 7.1.12(c) for gasoline loading); and
- v. Emissions of VOM attributable to fugitive losses (valves, pump seals, etc.), tons/month

and tons/year, with supporting calculations, calculated utilizing an approved USEPA methodology.

- b. The owner or operator of sources complying with 35 IAC Sections 219.762(a) and (b), or (c)(1), or (c)(3) of this Subpart shall maintain records regarding the marine terminal, and each time a marine vessel is loaded during the regulatory control period. The records shall include but are not limited to:
 - i. The date(s) and the time(s) at which the marine vessel was loaded from the marine terminal;
 - ii. The name, type, identification number, and owner of the vessel loaded;
 - iii. The type and amount of liquid loaded into the marine vessel;
 - iv. Records of any leaks found, repair attempts, and the results of the required fugitive monitoring and maintenance program, including appropriate dates, test methods, instrument readings, repair results, and corrective action taken as required by 35 IAC Sections 219.762(a)(2) and 219.766 of this Subpart;
 - v. A copy of the Coast Guard certification demonstrating that the marine terminal's vapor collection and control system has been certified as required by Coast Guard regulations found at 33 CFR 154; and
 - vi. A copy of the Coast Guard certification demonstrating that the marine vessel has been inspected and certified as required by Coast Guard regulations found at 46 CFR 39. If a copy of the Coast Guard certificate is not available at the time of loading, then the date that the marine vessel was last inspected and the authorization that the marine vessel has functioning vapor control equipment must be recorded from the certificate. Further, a copy of the certificate must be obtained by the owner or operator of the marine terminal within 21 days after the loading event.
- c. Owners or operators complying with 35 IAC Sections 219.762(b)(3)(B), (b)(3)(C), or (b)(3)(D) shall additionally maintain the following records concerning the vapor-tightness of the marine vessel:

- i. Test title;
 - ii. Owner of the marine vessel tested;
 - iii. The identification number of the marine vessel tested;
 - iv. Testing location;
 - v. Tester name and signature;
 - vi. Witnessing inspector, name, signature, and affiliation; and
 - vii. Test results.
- d. Owners or operators complying with the requirements of 35 IAC Section 219.762(c)(2) of this Subpart shall maintain records of daily product volumes loaded to demonstrate that the applicable emission reduction specified in Appendix E of this Part has been achieved.
- e. Owners or operators certifying compliance under 35 IAC Section 219.764(c) shall maintain the records specified in subsections (b)(1), (b)(2), and (b)(3) above.
- f. All records required by subsections (b), (c), (d), and (e) of this Section shall be maintained for at least three years and shall be made available to the Agency upon request.
- g. Total natural gas usage for flare (ft³/mo)

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected marine vessel loading operations 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.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected loading rack 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

7.2.12 Compliance Procedures

- a. Compliance with the operational limitations of Condition 7.2.5(a), shall be demonstrated through the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.2.8, 7.2.9, and 7.2.10 and the compliance procedures in 7.2.12(c) and (d).
- b. Compliance with the control requirements of 7.2.5(a) shall be demonstrated by the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.2.8, 7.2.9, and 7.2.10 and the fact that compliance of loading rack and associated vapor recovery unit have previously been demonstrated by fulfillment of the test requirements of 40 CFR 60.8 by measurement of the total organic concentration(s) in the effluent stream of the vapor recovery system pursuant to 40 CFR 60.503.
- c. VOM and HAP emission from the loading shall be calculated by use of the following equations:
 - i.
$$\text{Total VOM Emissions (lb)} = \text{Throughput (gallons)} \times \text{EF}^* \times (1 - \text{Control Efficiency of Flare}/100)$$

Where:

Throughput = Loading Rack Throughput as Determined by the Records Required in 7.2.9(a)
Control Efficiency of Flare = 97 %

* Emission Factors as provided in the Title 5 application

- ii.
$$\text{HAP emissions} = \text{VOM emissions} \times \text{EF}^{**}$$

Material Loaded	Emission Factor lb/1000 Gallon
Gasoline	3.90
Distillate Fuel Oil	0.012

** Emission Factors as provided in the Title 5 application

HAP	HAP to VOM Emission Factor (% by Wt.) for Gasoline	HAP to VOM Emission Factor (% by Wt.) for Distillate Fuel Oil No. 2
Benzene	0.53	12.38
Cumene	0.02	0.37
Ethylbenzene	0.06	0.38
Hexane	4.43	24.76
Toluene	0.84	4.36
Xylene	0.24	2.45
2,2,4-Trimethylpentane	0.99	0.28

- d. Emissions from the flare burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (Lb/mmBtu)</u>
NO _x ¹	0.068
PM/PM ₁₀ ^{2, 3}	7.6
SO ₂ ^{2,3}	0.6
CO ¹	0.37

¹ Emissions calculated using emission factors from AP-42, Table 13.5-1, Emission Factors for Flare Operations.

² These are the emission factors for uncontrolled natural gas combustion in commercial boilers (< 100 mmBtu/hr), Table 1.4-2, AP-42, Volume I, Supplement D, July 1998. VOM emission factor based on TOC factor corrected for 52% methane contribution.

³ Emissions calculated assuming that natural gas and gasoline have similar quantities of PM and SO₂ resulting from combustion

Flare Emissions (Ton) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor/2,000.

7.3 Unit 03: External Floating Roof Storage Tanks
 Control: Floating Roof, Double Seals and Submerged Loading

7.3.1 Description

The terminal has a number of storage tanks used to store gasoline (RVP 15), ethanol, and all VPLs with vapor pressure lower than gasoline.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 03	External Floating Roof Tanks:		
	120-1	1947	Floating Roof, Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
	120-2	1947	
	120-3	1953	
	120-4	1953	
	102-5	1953	
	120-7	1957	
	120-8	1945	
	120-10	1949	
	120-11	1953	
	80-4	1953	
	80-5	1960	
	80-10	1961	
	80-11	1954	
	20-8		
	10-20		
	5-10		

7.3.3 Applicability Provisions

- a. An "affected tank," for the purposes of these unit-specific conditions, is a storage tank that is only subject to the requirements of 35 IAC 219.121, 219.122(b), 219.123, and 219.124. Each storage tank with a capacity of 151.42 cubic meters (approx. 40,000 gallons) or more, storing volatile petroleum liquid (VPL), equipped with an external floating roof is subject to the requirements of 35 IAC 219.124(a) unless it is exempted pursuant to 35 IAC 219.124(b). A tank also may be exempt due to the current service, features, or other circumstances associated with the tank. A tank must comply with other rules if the vapor pressure of the VPL is 86.19 kPa (12.5 psia) or greater at 294.3°K (70°F).

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in

Condition 7.3.2. The status of all storage tanks at this source, including affected tanks that are subject to 35 IAC 218.124(a), is summarized in Attachment 1.

- b. When storing a volatile organic liquid (VOL, e.g. ethanol), each tank is subject to 35 IAC 219.120(a)(3) which requires double seals. Compliance with Condition 7.3.5, 7.3.7 and 7.3.8 shall be deemed compliance with this requirement.

7.3.4 Non-Applicable Regulations

None

7.3.5 Control Requirements

Each affected tank shall be equipped with the following:

- a. A floating roof which rests on the surface of the VOL that is equipped with a primary seal [35 IAC 219.121(b)(1)];
- b. A floating roof that is equipped with a continuous seal extending from the floating roof to the tank wall (rim mounted secondary seal) [35 IAC 219.124(a)(1)] (The Illinois EPA has not approved use of other equivalent equipment in lieu of a rim-mounted secondary seal.);
- c. All drains (for drainage of rainwater, also know as "stub drains") in the floating roof deck shall be provided with slotted membrane fabric covers or equivalent covers across at least 90 percent of the area of the opening [35 IAC 219.124(a)(3)];
- d. All openings of the floating roof deck, other than drains, shall be equipped with projections into the tank which remain below the liquid surface at all times except when supported on the roof legs and be equipped with covers, lids or seals [35 IAC 219.124(a)(4)]; and
- e. A permanent submerged loading pipe [35 IAC 219.122(b)].

7.3.6 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.

None

7.3.7 Operating Requirements

- a. Each affected tank shall be operated so that the floating roof including the seal closure devices meet the following requirements:
 - i. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 219.123(b)(2)];
 - ii. The seal is intact and uniformly in place around the circumference of the floating roof between the floating roof and tank wall [35 IAC 219.124(a)(2)(A)];
 - iii. The accumulated area of gaps exceeding 0.32 centimeter (1/8 inch) in width between the secondary seal and the tank wall shall not exceed 21.2 square centimeters per meter of tank diameter (1.0 square inch per foot of tank diameter) [35 IAC 219.124(a)(2)(B)]; and
 - iv. The covers, lids or seals on openings of the floating roof deck other than stub drains shall be operated such that the following requirements are met:
 - A. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank [35 IAC 219.123(b)(3)(A)];
 - B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports [35 IAC 219.123(b)(3)(B)]; and
 - C. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting [35 IAC 219.123(b)(3)(C)].
- b. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected tank, except during sampling or maintenance operations [35 IAC 219.121(b)(1)].

7.3.8 Inspection Requirements

- a. The Permittee shall inspect each affected tank prior to May 1 of each year, to insure compliance with the

applicable control and operating requirements [35 IAC 219.124(a) (5)].

- b. i. The Permittee shall measure the secondary seal gap of each affected tank prior to May 1 of each year. This measurement shall be conducted in accordance with the methods and procedures specified in 40 CFR 60, Subpart Kb [35 IAC 219.124(a) (6)].
- ii. Prior notification for the above measurements shall be given to the Illinois EPA as specified in Condition 7.3.10(b).
- c. The Permittee shall perform a complete inspection of the cover and seals of each affected tank whenever the tank is emptied and degassed for any reasons other than the transfer of liquid during the normal operation of the tank, or whenever repairs are made that require degassing of the tank as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 219.123(b) (5)].

7.3.9 Recordkeeping Requirements

- a. In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following items for each affected tank, pursuant to 35 IAC 219.123(b) (6) and 219.124(a) (7):
 - i. A list of the types of volatile petroleum liquid stored on a monthly basis;
 - ii. The maximum true vapor pressure of each type of liquid as stored, psia;
 - iii. The results of any inspections or measurements required by the Condition 7.3.8(a), (b) and/or (c), including:
 - A. Type of inspection;
 - B. When the inspection and/or measurement was performed;
 - C. Who performed the inspection and/or measurement;
 - D. The method of inspection and/or measurement;
 - E. The observed condition of each feature of the external floating roof (seals, roof

deck and fittings) with raw data recorded during the inspection and/or measurement; and

F. Summary of compliance.

- b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with Condition 7.3.8(c) (Cover and Seal Inspection) [35 IAC 219.123(b) (6)]:

Records that are sufficient to identify whenever the tank is emptied and degassed for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect.

7.3.10 Reporting Requirements

- a. The Permittee shall notify the Illinois EPA, Compliance Section and Regional Field Office, at least 30 days before the planned performance of seal gap measurements, pursuant to Section 39.5(7) (f) of the Act, so the Illinois EPA may observe the measurements.
- b. The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations with the control, operating, or inspection requirements, as follows pursuant to Section 39.5(7) (f) (ii) of the Act:
 - i. Any storage of VPL in an affected tank that is not in compliance with the control requirements (due to absence of the features required by Condition 7.3.5, e.g., "no rim-mounted secondary seal,") within 5 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
 - ii. Any storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.3.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected tank 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:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.3 of this permit.
- b. The primary seals may be replaced with the same or a different type. Secondary seals may be replaced but must be rim-mounted.

7.3.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use of the TANKS program, AP-42 upon which the Tanks Program is based, or any other method that utilizes USEPA approved emission factors for storage tank emissions.
- b. For the purpose of estimating HAP emissions from equipment at the facility, the vapor wt percent (based on a 1992 USEPA survey or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable. Other means of estimating HAP emissions utilizing USEPA accepted methodologies is also acceptable.

7.4 Unit 04: Internal Floating Roof Storage Tanks
 Control: Floating Roof and Seals, Permanent Submerged Loading

7.4.1 Description

The Permittee operates a six (6) internal floating roof storage tanks to store gasoline (RVP 15), ethanol, and all VPLs with vapor pressure lower than gasoline. Permanent submerged loading is an inherent part of this design since there is no vapor space.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed/ Modified	Emission Control Equipment
Unit 04	Group 1 Tanks*: 20-3/840,000 Gal 10-10/420,000 Gal	1948/1990 1941/1994	Internal Floating Roof, Submerged Loading
	Group 2 Tanks (Not Subject to NSPS): 10-5/420,000 Gal 10-7/420,000 Gal T-3-1/ 126,000 Gal	1941 1941 1956	
	Group 3 Tank** 120-9/5,040,000 Gal	1975	

* Subject to 40 CFR 60, Subpart Kb

** subject to 40 CFR 60, Subpart K

7.4.3 Applicability Provisions and Applicable Regulations

- a. The affected tanks, for the purpose of these unit specific conditions, are the tanks as described in Conditions 7.4.1 and 7.4.2.
- b. An "affected tank" of group 1, for the purposes of these unit specific conditions, are the storage tanks that are subject to the control requirement of 40 CFR 60 Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984); these tanks rely on an internal floating roof for compliance. A storage tank constructed, reconstructed, or modified after July 23, 1984 is subject to the control requirements of 40 CFR 60 Subpart Kb if it has a capacity greater than or equal to 20,000 gallons (75 m³) storing a VOL with a maximum true vapor pressure of 15 kPa (2.2 psia) or more or a capacity greater than or equal to 40,000 gallons (151 m³) storing a VOL with a maximum true vapor pressure of 3.5 kPa (0.5 psia) or more.

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.4.2.

- c. Each storage tank subject to 40 CFR 60 Subpart Kb is hereby shielded from compliance with 35 IAC 219.121. This shield is issued to streamline the applicable requirements for the source, based on the Illinois EPA's finding that compliance with 40 CFR 60, Subpart Kb assures compliance with 35 IAC 219.121, following the review requirements of 40 CFR 60 Subpart Kb and 35 IAC 219.121.
- d. The "affected tanks" of group 2, for the purposes of these unit-specific conditions, are the storage tanks that are subject to the requirements of 35 IAC 219.121, 219.122(b), and 219.123. Each storage tank with a capacity of 151.42 cubic meters (approx. 40,000 gallons) or more, storing volatile petroleum liquid (VPL), is subject to the requirements of 35 IAC 219.123(b) unless it is specifically excluded pursuant to 35 IAC 219.123(a). Group 1 and 2 tanks are exempt from some of the requirements based on applicability of a NSPS [35 IAC 219.123(a)(5)]. A tank also may be exempt due to the current service, features, or other circumstances associated with the tank (See Condition 5.8). A tank must comply with other rules if the vapor pressure of the VPL is 86.19 kPa (12.5 psia) or greater at 294.3°K (70°F).

When in VOL service (e.g., storing ethanol), an "affected tank," for the purposes of these unit-specific conditions, is a storage tank subject to the requirements of 35 IAC 219.120(a) and 219.122(b) that relies upon a permanent submerged loading pipe and internal floating roof for compliance. An affected storage tank is subject to the control requirements of 35 IAC 219.120(a) if it has a capacity greater than or equal to 40,000 gallons storing a VOL with a vapor pressure of 0.75 psia or more but less than or equal to a maximum true vapor pressure of 11.1 psia [35 IAC 219.120(a)(1)].

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.4.2.

- e. Tank 120-9 is subject to the control requirement of 40 CFR 60 Subpart K (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978) and relies on an internal floating roof for compliance. A storage tank constructed, reconstructed, or modified

after March 8, 1974, and prior to May 19, 1978 is subject to the control requirements of 40 CFR 60 Subpart K that has a capacity greater than 151, 416 liters (40,000 gallons), but not exceeding 246,052 liters (65,000 gallons); alternatively, a storage tank may be subject to 40 CFR 60 Subpart K if it has a capacity greater than 246,052 liters (65,000 gallons) and commences construction or modification after June 11, 1973, and prior to May 19, 1978.

- f. Each affected tank is subject to the emission limits identified in Condition 5.2.2.

7.4.4 Non-Applicability of Regulations of Concern

- a. Groups 1 tanks and 120-9 tank are not subject to 35 IAC 219.123 when in VPL service because they are subject to a NSPS [35 IAC 219.123(a)(5)]. Though these tanks are subject to 35 IAC 219.121, compliance with Subpart Ka or Kb is deemed to be more stringent and will demonstrate compliance with 35 IAC 219.121.
- c. The affected tanks are not subject to 35 IAC 219.124 because the tanks are considered internal floating roof tanks.
- d. This permit is issued based on the affected storage tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected storage tanks uses a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

7.4.5 Control Requirements and Work Practices

- a. Each affected tank of Group 1 and tank 120-9 shall comply with the requirements of 40 CFR 60.112b(a)(1)(i) and 40 CFR 60.112(a)(1), respectively, which requires the use of a floating roof that is equipped with one of the following closure devices:
 - i. A foam-filled or liquid-filled liquid-mounted seal; or
 - ii. Two continuous seals; or
 - iii. A mechanical shoe seal
- b. Each affected tanks shall also be equipped with a permanent submerged loading pipe, pursuant to 35 IAC 219.122(b).

- c. When storing a VPL with a vapor pressure of 1.5 psia or greater and VOL with a vapor pressure of 1.5 psia or greater storage tanks of group 1 and tank 120-9 shall be equipped with a floating roof which rests on the surface of the VOL that is equipped with a primary seal [35 IAC 219.121(b) (1) and 40 CFR 60.112a(a) (2)];
- d. For storage tanks of group 1 and tank 120-9 all openings of the floating roof deck, other than drains, shall be equipped with covers, lids or seals [35 IAC 219.123(b) (3)]; and
- e. When any tank is in ethanol (VOL) service the following control requirements apply:
 - i. An internal floating roof which shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible [35 IAC 219.120(a) (1) (A)].
 - ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof [35 IAC 219.120(a) (1) (B)]:
 - A. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank;
 - B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous; or

- C. A mechanical shoe seal, which is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

- iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface [35 IAC 219.120 (a) (1) (C)].

- iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use [35 IAC 219.120 (a) (1) (D)].

- v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports [35 IAC 219.120 (a) (1) (E)].

- vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting [35 IAC 219.120 (a) (1) (F)].

- vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening [35 IAC 219.120 (a) (1) (G)].

- viii. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover [35 IAC 219.120 (a) (1) (H)].

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.

None

7.4.7 Operating Requirements

Each affected group 1 tank shall be operated in compliance with the operating requirements of 40 CFR 60.112b(a) (1) and 60.113b(a), as follows:

- a. The internal floating roof shall float on the liquid surface at all times, except during those intervals when the storage tank is being completely emptied and subsequently refilled and the roof rests on its leg supports. When the roof is resting on its leg supports, the process of emptying or refilling shall be continuous and shall be accomplished as rapidly as possible. [40 CFR 60.112b(a) (1) (i)].
 - i. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents shall provide a projection below the liquid surface [40 CFR 60.112b(a) (1) (iii)].
 - ii. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains shall be equipped with a cover or lid which is maintained in a closed position at all times (i.e., no visible gaps) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use [40 CFR 60.112b(a) (1) (iv)].
 - iii. Automatic bleeder vents shall be equipped with a gasket and be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports [40 CFR 60.112b(a) (1) (v)].
 - iv. Rim space vents shall be equipped with a gasket and be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting [40 CFR 60.112b(a) (1) (vi)].

- v. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening [40 CFR 60.112b(a) (1) (vii)].
- vi. Each penetration of the internal floating roof that allows for the passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover [40 CFR 60.112b(a) (1) (viii)].
- vii. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover [40 CFR 60.112b(a) (1) (ix)].
- viii. A tank that is in-service shall be repaired or emptied upon identification in an inspection that the floating roof is not resting on the surface of the VOL, there is liquid accumulated on the roof, the seal is detached, or there are holes or tears in the seal fabric. These actions shall be completed within 45 days of the inspection unless an extension is granted [40 CFR 60.113b(a) (2) and (a) (3) (ii)].
- ix. A tank that is empty shall be repaired prior to refilling the tank upon identification in an inspection that the floating roof has defects, the primary seal has holes, tears or other openings in the seal or seal fabric, or the secondary seal has holes, tears or other openings in the seal or seal fabric, or the gaskets no longer close off [40 CFR 60.113b(a) (3) (ii) and (a) (4)].
- x. Group 2 storage tanks shall be operated so that the floating roof including the seal closure devices meet each of the following requirements:
 - A. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 219.123(b) (2)];
 - B. The covers, lids or seals on openings of the floating roof deck other than stub drains shall be operated such that the following requirements are met:

1. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank [35 IAC 219.123(b) (3) (A)];
 2. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports [35 IAC 219.123(b) (3) (B)]; and
 3. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting [35 IAC 219.123(b) (3) (C)].
- b. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected Group 1 or Group 2 tank, except during sampling or maintenance operations [35 IAC 219.121 (b) (1)].

7.4.8 Inspection Requirements

- a. The Permittee shall fulfill the applicable testing and procedures requirements of 40 CFR 60.113b(a) for each tank of Group 1 equipped with an internal floating roof as follows:
 - i. Visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once ever 12 months (Annual Inspection) to identify any deficiency or shortcoming in the roof's features, (i.e., the internal floating roof is not resting on the surface of the VOL inside the storage tank, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric) that the Permittee must repair or otherwise remove the storage tank from service [40 CFR 60.113b(a) (2) and (a) (3) (ii)].
 - ii. Visually inspect the internal floating roof the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes (if any), and sleeve seals (if any) each time the storage vessel is emptied and degassed (Out-of-Service Inspection) to identify any deficiency or shortcoming in the roof's features, (i.e., internal floating roof has defects, the

primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area) that the Permittee shall repair the features prior to refilling the storage tank with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in 40 CFR 60.113b(a) (2) and (a) (3(ii)) and at intervals no greater than 5 years in the case of vessels specified in 40 CFR 60.113b(a) (3) (i) [40 CFR 60.113b(a) (3) (i) and (a) (4)].

- iii. Prior notification for the above inspection shall be given to the Illinois EPA as specified in Condition 7.4.10(a) (ii).
- b. The Permittee shall inspect the floating roof seals of each affected Group 2 tank when storing a VPL with a vapor pressure of 1.5 psia or greater once every six months. Compliance will be demonstrated with the timing of the inspections if two inspections occur within a calendar year with one taking place in January through June and the second taking place in July through December; or if the inspections are not more than 190 days apart [35 IAC 219.123(b) (4)].
- c. The Permittee shall perform a complete inspection of the cover and seals of each affected Group 2 tank whenever the tank is emptied and degassed for any reasons other than the transfer of liquid during the normal operation of the tank, or whenever repairs are made that require the tank to be emptied and degassed as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 219.123(b) (5)].
- d. When any tank is in ethanol service (VOL), the following inspection requirements will apply:
 - i. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service) prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the

items before filling the storage vessel [35 IAC 219.127(a)(1)].

- ii. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or if there is liquid accumulated on the roof, or if the seal is detached, or if there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this subsection cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, the owner or operator may request a 30-day extension from the Illinois EPA in the inspection report required in 35 IAC 218.129(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the owner or operator will take that will assure that the control equipment will be repaired or the vessel will be emptied within 30 days [35 IAC 219.127(a)(2)].
- iii. For vessels equipped with both primary and secondary seals:
 - A. Visually inspect the vessel as specified in subsection (iv) below at least every 5 years; or
 - B. Visually inspect the vessel as specified in subsection (ii) above.
- iv. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes, and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal, or if the seal fabric or the secondary seal has holes, tears, or other openings in the seal, or if the seal fabric or the gaskets no longer close off the liquid surfaces from the atmosphere, or if the

slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this subsection exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels subject to the annual visual inspection as specified in subsections (ii) and (iii)(B) above and at intervals no greater than 5 years in the case of vessels specified in subsection (iii)(A) above.

- v. Notify the Illinois EPA in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by subsections (i) and (iv) above to afford the Illinois EPA the opportunity to have an observer present. If the inspection required by subsection (iv) above is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Illinois EPA at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Illinois EPA at least 7 days prior to the refilling [35 IAC 219.127(a)(5)].

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected storage tank to demonstrate compliance with Conditions 5.5.1, 7.4.3, 7.4.5, 7.4.6, 7.4.7, and 7.4.8, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall fulfill the applicable recordkeeping requirements of 40 CFR 60.115b for each affected Group 1 tanks pursuant to 40 CFR 60.115b(a), as follows:

Keep a record of each Annual and Out-of-Service Inspection performed as required by Condition 7.4.8(a)(i)-(ii) [40 CFR 60.115b(a)(2)].

- i. The date the inspection was performed;

- ii. Who performed the inspection;
 - iii. The method of inspection;
 - iv. The observed condition of each feature of the internal floating roof (seals, roof decks and fittings), with the raw data recorded during the inspection; and
 - v. Summary of compliance.
- b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with the Out-of-Service Inspection requirements of Conditions 7.4.8(a)(ii), 7.4.8(c) and 7.4.8(d)(iv):
- Records that are sufficient to identify whenever the tank is empty for any reason or whenever repairs are made as a result of regular inspection or incident of roof damage or defect.
- c. The Permittee shall keep the operating records required by 40 CFR 60.116b for each affected tanks of group 1, as follows:
- Records of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period [40 CFR 60.116b(c)].
- d. In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following items for each affected tank (Group 2) in VPL service, pursuant to 35 IAC 215.123(b)(6) or 40 CFR 60.113:
- i. A list of the types of volatile petroleum liquid stored on a monthly basis;
 - ii. The maximum true vapor pressure of each type of liquid as stored, psia; and
 - iii. For Group 2 tanks the results of any inspections or measurements required by the Condition 7.4.8(a) and/or (b), including:
 - A. Type of inspection;
 - B. When the inspection and/or measurement was performed;

- C. Who performed the inspection and/or measurement;
 - D. The method of inspection and/or measurement;
 - E. The observed condition of each feature of the external floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement; and
 - F. Summary of compliance.
- e. The Permittee shall maintain records of the following for each affected Group 2 tank to demonstrate compliance with Condition 7.4.8(b) (Cover and Seal Inspection) [35 IAC 219.123(b) (6)]:
- Records that are sufficient to identify whenever the tank is emptied for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect.
- f. When any tank is in VOL service (ethanol) the Permittee shall maintain records and furnish reports as required below.
- i. Keep a record of each inspection performed as required by Condition 7.4.8(c). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings);
 - ii. If any of the conditions described in Condition 7.4.8(c) are detected during the annual visual inspection required, report to the Illinois EPA within 30 days after the inspection the identity of the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made; and
 - iii. After each inspection required Condition 7.4.8(c) (iii) where holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in Condition 7.4.8(c) are discovered, report to the Illinois EPA within

30 days after the inspection the identity of the storage vessel and the reason it did not meet the specifications of Conditions 7.4.5(e) or 7.4.8(c) and list each repair made [35 IAC 219.127(a)].

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected storage 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 submit written notifications and reports to the Illinois EPA, Compliance Section as required by the NSPS, for each affected tank, as follows:
 - i. A report identifying any deficiencies or shortcomings identified in the Annual Inspection required by Condition 7.4.8(a) within 30 days of inspection. This report shall include the information specified in 40 CFR 60.115b(a)(3).
 - ii.
 - A. Notification at least 30 days prior to refilling an affected group 1 tank for which an Out-of-Service inspection is required by Condition 7.4.8(b)(i) to afford the Illinois EPA with the opportunity to have an observer present [40 CFR 60.113b(a)(5)].
 - B. If the inspection is not planned and the owner or operator of the group 1 tank could not have known about refilling the tank 30 days in advance, a shorter notification may be accepted as provided for in 40 CFR 60.113b(a)(5).
 - iii. A report identifying any deficiencies or shortcomings identified in the Out-of-Service Inspection within 30 days of the inspection required by Condition 7.4.8(b)(i). This report shall include the information specified in 40 CFR 60.115b(a)(4).
- b. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- i. Any storage of VOL in an affected tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.4.5, e.g., no "secondary seal," within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.
 - ii. Any storage of VOL in an affected tank that is out of compliance with the control requirements (Condition 7.4.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
 - iii. Any exceedance of the emission and operational limits shown in Conditions 7.4.6(b) and 7.4.7(b), respectively.
- c. Any storage of VPL in an affected tank that is not in compliance with the control requirements (due to absence of the features required by Condition 7.4.5, e.g., "no permanent submerged loading pipe," within 5 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
 - d. Any storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.4.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected storage tanks 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:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the Condition 7.4.5 of this permit.
- b. The primary seals may be replaced with the same or a different type. Secondary seals may be replaced but must be rim-mounted.

7.4.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use of the TANKS program, AP-42 upon which the TANKS program is based, or any other method that utilizes USEPA approved emission factors for storage tank emissions.
- b. For the purpose of estimating HAP emissions from equipment at the facility, the vapor wt. percent (based on a 1992 USEPA survey or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable. Other means of establishing HAP emissions utilizing USEPA accepted methodologies is also acceptable.

7.5 Unit 05: Wastewater Treatment System and Thermal Oxidizer
 Control: None

7.5.1 Description

The wastewater treatment plant is used to treat wastewater that is potentially contaminated with oily hydrocarbons prior to discharge to the Mississippi River. Potential sources of wastewater treated at the plant include stormwater from Premcor Hartford Distribution Center or portion of the former Premcor Hartford Refinery (now owned by Conoco Phillips Wood River Refinery) and non-rain event water. Non-rain event water may include, but is not limited to: groundwater, tank bottom water, tank cleaning water, hydrostatic test water, boiler and cooling tower blowdown water (from Conoco Phillips) and small miscellaneous sources including water from pump cleanings, truck washings, etc.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed/Modified	Emission Control Equipment
Unit 05	Wastewater Treatment Plant: Entry Points, Two (2) Equalization Tanks, Diffused Air Flotation (DAF) Unit, Two (2) Aeration Basins, Two (2) Clarifiers, Anthracite/Sand Filter.	1973/1994*	Anthracite/Sand Filters

* Installation of two (2) equalization tanks (T-161, T-162)

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected wastewater treatment system" for the purpose of these unit-specific conditions, is the wastewater treatment system described in Conditions 7.5.1 and 7.5.2.
- b. The affected wastewater treatment system is subject to the emission limits identified in Condition 5.2.2.
- c. i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 219.302, 219.303, 219.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall apply only to

photochemically reactive material [35 IAC 219.301].

- ii. Emissions of organic material in excess of those permitted by Condition 7.5.3(c) (i) are allowable if such emissions are controlled by a flame or thermal incineration (oxidizer) so as to either reduce such emissions to 10 ppm equivalent methane or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 219.302(a)].

7.5.4 Non-Applicability of Regulations of Concern

- a. The affected wastewater treatment system is not subject to the NSPS for VOC Emissions From Petroleum Refinery Wastewater Systems, 40 CFR 60 Subpart QQQ, because the affected wastewater treatment operations are not located at a petroleum refinery.
- b. The affected wastewater treatment system is not subject to 35 IAC 219.443, Wastewater (Oil/Water) Separator, because the affected wastewater treatment operations are not located at a petroleum refinery.
- c. This permit is issued based on the affected wastewater treatment system not being subject to 35 IAC 219 Subpart TT, Other Emission Units, because the affected wastewater treatment operations do not meet the applicability of 35 IAC 219.980(a). In particular, the affected wastewater treatment operations have maximum theoretical emissions of VOM that are less than 90.7 Mg (100 tons) per year.
- d. The affected wastewater treatment system is not subject to 35 IAC 219.141(a), as applicability requires use any single or multiple compartment effluent water separator which receives effluent water containing 757 l/day (200 gal/day) or more of organic material from any equipment processing, refining, treating, storing or handling organic material; the affected wastewater treatment operations do not meet this threshold.

7.5.5 Operational and Production Limits and Work Practices

- a. Records addressing use of good operating practices for the filters:
 - i. Records for periodic inspection of the filters with date, name of individual performing the inspection, and the nature of the inspection.

- ii. Records of prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

7.5.6 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.

None

7.5.7 Operating Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected wastewater treatment system to demonstrate compliance with Conditions 5.5.1, 7.5.3, 7.5.5, 7.5.7, and 7.5.8, pursuant to Section 39.5(7)(b) of the Act:

- a. Inputs for the Water9 software in order to calculate emissions for the affected wastewater treatment operations;
- b. The amount of wastewater treated, gal/day and gal/year; and
- c. VOM and HAP emissions (lb/month and ton/yr).

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected wastewater treatment system 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.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

Compliance with the requirements of Condition 7.5.3(c) (219.302) is assured by compliance with the operational requirements of Condition 7.5.5, the monitoring requirements of Condition 7.5.8 and the recordkeeping requirements in Condition 7.5.9 along with the use of software (as approved by the USEPA) to calculate emissions from the affected wastewater treatment system.

7.6 Unit 06: Fugitive Emissions - Paved and Unpaved Roadways

7.6.1 Description

Moving vehicles create particulate matter (road dust) emissions on paved and unpaved roadways.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 06	Fugitive Emissions from Paved and Unpaved Roads	---	---

7.6.3 Applicability Provisions and Applicable Regulations

Refer to the source-wide conditions in Condition 5.2.2, which address opacity requirements.

7.6.4 Non-Applicability of Regulations of Concern

N/A

7.6.5 Control Requirements

None

7.6.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, Unit 6 is subject to the following:

None

7.6.7 Testing Requirements

- a. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act and 35 IAC 212.107, for both fugitive and non-fugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This test method shall be used to determine compliance with 35 IAC 212.123 [35 IAC 212.107].
- b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR part 60, Appendix A, except that for

roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged. This test method shall be used to determine compliance with 35 IAC 212.301 [35 IAC 212.109].

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1 and this section pursuant to Section 39.5(7) (b) of the Act:

- a. W = Mean vehicle weight (tons)
- b. VMT = Vehicle miles traveled

Records for fugitive road dust shall be calculated on an annual basis, except this calculation shall be updated if substantial changes to the roads occur, i.e. additional roads added.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements 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.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

Compliance with the emission limits of section 5 shall be based on the recordkeeping and reporting requirements in this section and the emission factors and methods listed below:

- a. Emissions from paved roads shall be calculated based on the following emission factors and formulas from Section 13.2.1 AP-42, Volume I, January, 1995:

$$E = k [sL/2]^{0.65} [W/3]^{1.5}$$

PM emissions from unpaved roads = VMT x E

Conversion factors used: 2000 lb/ton

Note: k, sL available in Section 13.2.1 AP-42, Volume I, January, 1995:

- b. Emissions from unpaved roads shall be calculated based on the following emission factors and formulas:

$$E = k [s/12]^a [W/3]^b / (M/0.2)^c$$

E is based upon the emission factor for PM from unpaved roads from Section 13.2.2 AP-42, Volume I, September, 1998.

PM emissions from unpaved roads = VMT x E

Conversion factors used: 2,000 lb/ton

Note: s, k, a, b, c and M are available in Section 13.2.2 AP-42, Volume I, September.

7.7 Unit 07: Fugitive VOM Emissions from Leaking River Dock Flare Components
 Control: Leak Detection and Repair Program

7.7.1 Description

Leaking valves, flanges, seals, and miscellaneous components are sources of fugitive VOM emissions.

The processes comprising of pumps in light liquid service, pressure relief valves (PRV) in gas/vapor service, open-ended valve or line, valves, all fittings, and various fittings. The processes make up the units that are this natural gas processing plant's sources of fugitive VOM emissions. While these individual fittings and processes at the plant emit insignificant amounts of VOM emissions, the sum of the thousands of fittings are the primary source of VOC emissions at the plant. The procedures outlined in *Protocol for Equipment Leak Emission Estimates* (USEPA, 1995) were used to determine fugitive VOC emission rates for the plant. The NSPS for natural gas processing plants, 40 CFR 60, Subpart KKK, Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants requires that a Leak Detection and Repair (LDAR) program be instated. Expected levels of control for the LDAR were calculated using the method developed in *Protocol for Equipment Leak Emission Estimates* (USEPA, 1995).

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

7.7.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 07	Fugitive VOM Emissions from Valves, Flanges, Seals, and Miscellaneous Components of River Dock Flare	Not Available	Leak Detection and Repair Program

7.7.3 Applicability Provisions and Applicable Regulations

- a. The "affected Fugitive VOM Emissions from Leaking River Dock Flare Components", for the purpose of these unit-specific conditions, are the emission units described in section 7.7.1 and 7.7.2.

- b. The affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC 219.766, Organic Material Emissions Standards and Limitations for the Metro East Area/Leaks, since the facility is a marine terminal as the rule applicability requires.
- c. As prescribed applicable to marine terminals also by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC Section 219.445, Organic Material Emissions Standards and Limitations for the Metro East Area/Leaks: General Requirements.
- d. As prescribed applicable to marine terminals also by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC Section 219.446, Organic Material Emissions Standards and Limitations for the Metro East Area/Monitoring Program Plan for Leaks.
- e. As prescribed applicable to marine terminals also by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC Section 219.447, Organic Material Emissions Standards and Limitations for the Metro East Area/Monitoring Program for Leaks.
- f. As prescribed applicable to marine terminals also by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC Section 219.448, Organic Material Emissions Standards and Limitations for the Metro East Area/Recordkeeping for Leaks.
- g. As prescribed applicable to marine terminals also by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC Section 219.449, Organic Material Emissions Standards and Limitations for the Metro East Area/Reporting for Leaks.

7.7.4 Non-Applicability of Regulations of Concern

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

60 Subpart LLL, Standards of Performance for Onshore Natural Gas Processing since the facility is classified as a Petroleum Bulk Storage and Loading facility.

7.7.5 Operational and Production Limits and Work Practices

None

7.7.6 Emission Limitations

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

None

7.7.7 Testing Requirements

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

- a. Test once between March 1 and June 1 of each year, by methods referenced in Section 219.105(g) of this Part, all pump seals, pipeline valves in liquid service and process drains;
- b. Test once each quarter of each calendar year, by methods referenced in Section 219.105(g) of this Part, all pressure relief valves in gaseous service, pipeline valves in gaseous service and compressor seals;
- c. Inaccessible valves may be tested once each calendar year instead of once each quarter of each calendar year;
- d. Observe visually all pump seals weekly;
- e. Test immediately any pump seal from which liquids are observed dripping;
- f. Test any relief valve within 24 hours after it has vented to the atmosphere; and
- g. Test immediately after repair any component that was found leaking.

- h. Storage tank valves and pressure relief devices connected to an operating flare header or vapor recovery device are exempt from the monitoring requirements in subsection (a) of this Section.
- i. The Illinois EPA may require more frequent monitoring than would otherwise be required by subsection (a) of this Section for components which are demonstrated to have a history of leaking.

7.7.8 Monitoring Requirements

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

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

7.7.9 Recordkeeping Requirements

- a. As prescribed applicable to marine terminals also by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC 219.448 which prescribes that the owner or operator of a petroleum refinery shall maintain a leaking components monitoring log which shall contain, at a minimum, the following information:
 - i. The name of the process unit where the component is located;
 - ii. The type of component (e.g., valve, seal);
 - iii. The identification number of the component;

- iv. The date on which a leaking component is discovered;
 - v. The date on which a leaking component is repaired;
 - vi. The date and instrument reading of the recheck procedure after a leaking component is repaired;
 - vii. A record of the calibration of the monitoring instrument;
 - viii. The identification number of leaking components which cannot be repaired until turnaround; and
 - ix. The total number of components inspected and the total number of components found leaking during that monitoring period.
- b. Copies of the monitoring log shall be retained by the owner or operator for a minimum of two years after the date on which the record was made or the report prepared.
 - c. Copies of the monitoring log shall be made available to the Illinois EPA, upon verbal or written request, at any reasonable time.

7.7.10 Reporting Requirements (include reporting of deviations from limits)

As prescribed applicable to marine terminals also by 35 IAC 219.766, affected Fugitive VOM Emissions from Leaking River Dock Flare Components are subject to 35 IAC 219.449, Reporting of Leaks, which provides that the owner or operator shall:

- a. Submit a report to the Agency prior to the 1st day of both July and September listing all leaking components identified pursuant to Section 219.447 of this Part but not repaired within 22 days, all leaking components awaiting unit turnaround, the total number of components inspected and the total number of components found leaking;
- b. Submit a signed statement with the report attesting that all monitoring and repairs were performed as required under 35 IAC Sections 219.445 through 219.448 of this Part.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.7.12 Compliance Procedures

a. Compliance with the emission limits in Conditions 5.5.1, 5.5.3, and 7.7.6 of the affected Fugitive VOM Emissions from Leaking River Dock Flare Components shall be based on the recordkeeping requirements in Condition 7.7.9 and the emission factors and formulas listed below:

i. The average emission factors for oil and gas production operations (Table 2-4 of Protocol for Equipment Leak Emission Estimates, 1995) were used for calculating fugitive VOC emissions for all fittings except valves. The following equation was used utilizing the fugitive emission factors:

$$E_{VOC} = F_A \times WF_{VOC} \times N \times 2.20 \text{ lb/kg}$$

Where:

E_{VOC} = Emission rate of VOC from all equipment in the stream of a given equipment type (lb/hr)

F_A = Applicable average emission factor for the equipment type (kg/hr/source) from table 2-4 of Protocol for Equipment Leak Emission Estimates, 1995.

WF_{VOC} = Average weight fraction of VOC in the stream

N = Number of pieces of equipment of the applicable equipment in the stream.

ii. For valves, a leak rate is determined from the following equation (Table 2-10, Protocol for Equipment Leak Emission Estimates, 1995)

$$\text{Leak Rate (kg/hr/valve)} = 2.29 \times 10^{-6} \times (SV)^{0.746}$$

Where:

SV = Screening value in ppm (assumed 500 ppm for PTE purposes; also, this is the value certified by the manufacturer that will not be exceeded for 100,000 cycles)

- iii. Calculations of leak detection and repair control (LDAR) effectiveness are based on the methods in Protocol for Equipment Leak Emission Estimates, 1995, USEPA. LDAR is applied to pumps and valves.
- b. LDAR data will be used to estimate emissions from the affected Fugitive VOM Emissions from Leaking River Dock Flare Components. Standard EPA methodologies will be used for these calculations.

7.8 Unit 08: Gasoline Storage Wells
 Control: None

7.8.1 Description

The facility operates two (2) a contractor gasoline storage tanks, gasoline tank west of main maintenance shop, gasoline tank wells, and portable 300 gal storage tanks.

7.8.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 08	Gasoline Storage	None

7.8.3 Applicability Provisions and Applicable Regulations

- a. The "affected Tank Wells" for the purpose of these unit-specific conditions, are the units described in conditions 7.8.1 and 7.8.2.
- b. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with Section 215.108 of this Part, or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 219.122(b) [35 IAC 219.122(b)].
- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 219.302, 219.303, or 219.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 219.301].

7.8.4 Non-Applicability of Regulations of Concern

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

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

7.8.5 Operational and Production Limits and Work Practices

The affected tank well shall only be used for the storage of gasoline.

7.8.6 Emission Limitations

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

Emission limits for VOM are not set for the affected tank well, as potential to emit in the absence of permit limit is less than the significant and major source thresholds for these pollutants pursuant to Title I of the CAA, specifically the federal rules for the Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

7.8.7 Testing Requirements

None

7.8.8 Monitoring Requirements

None

7.8.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected tank well to demonstrate compliance with Conditions 5.5.1, 7.8.3, and 7.8.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Design information for the tank showing the presence of a permanent submerged loading pipe;
- b. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe;
- c. The throughput of the affected tank well, gal/mo and gal/yr; and
- d. The monthly and aggregate annual VOM emissions from the affected tank well based on the material stored, the tank throughput, and the applicable emission factors and formulas with supporting calculations.

7.8.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected tank well 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. Any storage of VOL in an affected tank well that is not in compliance with the requirements of Conditions 7.8.3(b) (see also 35 IAC 219.122(b)), e.g., no "permanent submerged loading pipe," within thirty days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance;
- b. Any storage of VOL in an affected tank well that is out of compliance with the requirements of Conditions 7.8.3(b) (see also 35 IAC 219.122(b)) due to damage, deterioration, or other condition of the loading pipe, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance;
- c. The storage of any VOL or VPL other than the material specified in Condition 7.8.5(a) within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.8.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.8.9 and the emission factors and formulas listed below:

For the purpose of estimating VOM emissions from the affected tank well wells to determine compliance with Conditions 5.5.1 and 7.4.3(c), Versions 3.1 or 4.0 of the TANKS program are acceptable.

7.9 Unit: Lube Cubes
 Control: None

7.9.1 Description

Nineteen 500-gallon double walled containers (Lube Cubes).

7.9.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Lube Cubes	Nineteen 500-gallon Double Walled Containers	June 6, 2005	None

7.9.3 Applicability Provisions and Applicable Regulations

- a. The "affected lube cubes" for the purpose of these unit-specific conditions, are the units described in Conditions 7.9.1 and 7.9.2.
- b. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe [35 IAC 219.121(b)].

7.9.4 Non-Applicability of Regulations of Concern

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

7.9.5 Operational and Production Limits and Work Practices

Control requirements are not set for the affected Lube Cubes. However, there may be requirements for source-wide control requirements set forth in Condition 5.5.

7.9.6 Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected Lube Cubes are subject to the following:

- a. Emissions from the lube cubes and all other emission units at the source shall not exceed the following limits:

Individual HAPs		Combination Of All HAPs	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
0.8	8.0	2.0	20.0

The above limitations were established in Permit 05030053, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

Compliance with annual 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) [T1].

- b. This permit is issued based upon negligible emissions of volatile organic material (VOM) from each lube cube. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.18 tons/year [T1].

The above limitations were established in Permit 05030053, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

Compliance with annual 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) [T1].

7.9.7 Testing Requirements

Testing requirements are not set for the affected Lube Cubes. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.9.8 Monitoring Requirements

Monitoring requirements are not set for the Lube Cubes, however, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.9.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected Lube Cubes to demonstrate compliance with Condition 7.9.6, 5.6.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Emissions of VOM and HAPs (individual and combination of all HAPs) from each emission unit or group of emission units with supporting documentation and example calculations (tons/month and tons/year).
- b. As an alternative to keeping the above records, the Permittee may keep a demonstration, which shall be kept current, that the maximum emissions of such operations given the maximum level of activity that could as a practical matter, occur at the source, would not exceed the applicable limits in Condition 7.9.6.

All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.

7.9.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected Lube Cubes 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. Emissions from the affected Lube Cubes in excess of the limits specified in Condition 7.9.6 within 30 days of such occurrence.
 - ii. Operation of the affected Lube Cubes in excess of the limits specified in Condition 7.9.6 within 30 days of such occurrence.

7.9.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected Lube Cubes. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.9.12 Compliance Procedures

Compliance with emission limitations of Condition 7.9.6 is addressed by meeting the requirements of Condition 7.9.3(b) and the records required in Condition 7.9.9.

7.10 Unit 10: Storage and Barge Loading of Ethanol and Toluene
Control: River Dock Vapor Transfer/Flare System

7.10.1 Description

Storage and barge loading of Ethanol and Toluene.

7.10.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Storage and Barge Loading of Ethanol and Toluene *	Storage and Barge Loading of Ethanol and Toluene	09/2004	River Dock Vapor Transfer/Flare System

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

7.10.3 Applicability Provisions and Applicable Regulations

The affected "Storage and Barge Loading of Ethanol and Toluene" for the purpose of these unit-specific conditions, are the processes as described in Conditions 7.10.1 and 7.10.2.

7.10.4 Non-Applicability of Regulations of Concern

Non-applicability of regulations of concern are not set for the affected Storage and Barge Loading of Ethanol and Toluene. However, there may be source-wide non-applicability of regulations of concern set forth in Condition 5.4.

7.10.5 Operational and Production Limits and Work Practices

- a. Permittee shall operate and maintain tanks storing ethanol and toluene, including associated control features in accordance with good air pollution control practice to minimize emissions.
- b. The river dock vapor transfer/flare system shall be operated to control VOM emissions from loading of ethanol and toluene at all times that these materials are being loaded at the river dock.

7.10.6 Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected

Storage and Barge Loading of Ethanol and Toluene is subject to the following:

- a. Operation of the river dock shall not exceed the following limits:

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

- b. Operation of the storage facility shall not exceed a toluene throughput of 300,000 barrels/month and 3,000,000 barrels/year.
- c. Emissions attributable to the loading of ethanol and toluene shall not exceed the following limits:

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

Compliance with annual 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) [T1].

The above limitations were established in Permit 04070052, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.10.7 Testing Requirements

Testing requirements are not set for the affected Storage and Barge Loading of Ethanol and Toluene, however, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.10.8 Monitoring Requirements

Monitoring requirements are not set for the affected Storage and Barge Loading of Ethanol and Toluene. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.10.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected Storage and Barge Loading of Ethanol and Toluene to demonstrate compliance with Condition 7.10.6, and 5.6.1, pursuant to Section 39.5(7)(b) of the Act:

The Permittee shall maintain the following records:

- a. Properties of the ethanol and toluene materials handled at the facility, as needed to calculate VOM emissions from handling such materials with supporting documentation.
- b. Identification and throughput (barrels/month) for each type of material stored in each tank;
- c. Identification and throughput (barrels/month) of each material loaded at the river dock;
- d.
 - i. VOM emissions from the storage of ethanol and toluene (tons/month and tons/year), with supporting calculations.
 - ii. VOM emissions from the loading of ethanol and toluene (tons/month and tons/year), with supporting calculations.

7.10.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected Storage and Barge Loading of Ethanol and Toluene 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. Emissions from the affected Storage and Barge Loading of Ethanol and Toluene in excess of the limits specified in Condition 7.10.6 within 30 days of such occurrence.
 - ii. Operation of the affected Storage and Barge Loading of Ethanol and Toluene in excess of the limits specified in Condition 7.10.6 within 30 days of such occurrence.

7.10.11 Operational Flexibility/Anticipated Operating Scenarios

This permit authorizes the Permittee to store toluene in any two existing floating roof tanks.

7.10.12 Compliance Procedures

- a. Compliance with the limitations of Condition 7.10.6 is addressed by the requirements of Condition 7.10.5 and the records required in Condition 7.10.9.

7.11 Unit 11: Soil Vapor Extraction System
 Control: Thermal Oxidizer

7.11.1 Description

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

7.11.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Soil Vapor Extraction System	Blowers, Ancillary Equipment	1/2006	Thermal Oxidizer

7.11.3 Applicability Provisions and Applicable Regulations

- a. The "affected unit" for the purpose of these unit-specific conditions, is the soil vapor extraction system described in Conditions 7.11.1 and 7.11.2.
- b. The affected unit is subject to 35 IAC Part 219, Subpart TT: Other Emission Units.
- c. i. The affected unit is subject to 35 IAC 219.301: Use of Organic Material, which provides that:

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

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

the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.11.4 Non-Applicability of Regulations of Concern

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

7.11.5 Operational and Production Limits and Work Practices

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

Note: This control requirement is less stringent than the control requirement listed in Condition 7.11.3(c) (ii).

- b. The thermal oxidizer shall be in operation at all times when the affected unit is in operation and emitting air contaminants.
- c. The thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation.
- d. Natural gas shall be the only fuel fired in the thermal oxidizer.
- e. The maximum gas flow rate to the thermal oxidizer shall not exceed 750 cfm.

7.11.6 Emission Limitations

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

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

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

Compliance with annual 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) [T1].

The above limitations were established in Permit 05120034, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.11.7 Testing Requirements

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

7.11.8 Monitoring Requirements

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

7.11.9 Recordkeeping Requirements

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

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

7.11.10 Reporting Requirements

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

7.11.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected unit.

7.11.12 Compliance Procedures

- a. Compliance with the VOM emission limit in Condition 7.11.6 shall be based on the recordkeeping requirements in Condition 7.11.9 and the following equation:

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

- b. Compliance with the NO_x and CO emission limits in Condition 7.11.6 shall be determined by appropriate emission factors and the recordkeeping requirements in Condition 7.11.9.

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 **May 27, 2006** (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].

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 (MC 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

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
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) (o) (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) (1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Significant Storage Tanks

Table 1 - External Floating Roof Tanks^a

<u>Tank No.</u>	<u>Date Constructed</u>	<u>Nominal Capacity (Gallons)</u>
120-1	1947	5,040,000
120-2	1947	5,040,000
120-3	1953	5,040,000
120-4	1953	5,040,000
120-5	1953	5,040,000
120-8	1957	5,040,000
80-4	1945	3,360,000
80-5	1949	3,360,000
80-10	1953	3,360,000
80-11	1953	3,360,000
20-8	1960	840,000
10-20	1961	420,000
5-10	1954	215,880

^a The tanks above are used to store gasoline with a Reid Vapor Pressure not to exceed 15 (RVP 15) and all volatile petroleum liquids (VPLs) with vapor pressures lower than gasoline, RVP 15. The tanks will also store ethanol. All floating roof tanks have no vapor space and meet the requirement for submerged loading. All tanks were constructed prior to 1972 and therefore are not subject to NSPS.

10.2 Attachment 2 - 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: _____

10.3 Attachment 3 - 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. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
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;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

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, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT 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.

10.4 Attachment 4

Form 199-CAAPP, Application For Construction Permit (For CAAPP Sources Only)



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

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	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. ID 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? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <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: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63? <div style="float: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </div>
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63? <div style="float: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </div>
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? <div style="float: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </div>
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought? <div style="float: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </div>
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? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information. <div style="float: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </div>
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? <div style="float: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application </div>

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. Authorized Signature: BY: <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center;">_____</td> <td style="width: 50%; text-align: center;">_____</td> </tr> <tr> <td style="text-align: center;">AUTHORIZED SIGNATURE</td> <td style="text-align: center;">TITLE OF SIGNATORY</td> </tr> <tr> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____/_____/_____</td> </tr> <tr> <td style="text-align: center;">TYPED OR PRINTED NAME OF SIGNATORY</td> <td style="text-align: center;">DATE</td> </tr> </table>	_____	_____	AUTHORIZED SIGNATURE	TITLE OF SIGNATORY	_____	_____/_____/_____	TYPED OR PRINTED NAME OF SIGNATORY	DATE
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AUTHORIZED SIGNATURE	TITLE OF SIGNATORY								
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TYPED OR PRINTED NAME OF SIGNATORY	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.

10.5 Attachment 5 - 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

SIS:psj