

### **ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

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217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NSPS SOURCE -- REVISED

#### PERMITTEE SACRESSING SERVICES OF THE SECRETARY SECRETARY SECRETARY SERVICES OF THE SECRETARY SEC

Metropolitan Water Reclamation District of Greater Chicago Attn: Director of Maintenance and Operations 100 East Erie Street West of Design San A bas E 15 1 1 200 2011 Chicago, Illinois 60611

Application No.: 75050146 I.D. No.: 031600DQ0

Applicant's Designation: Date Received: December 19,2

Subject: Calumet Water Reclamation Plant

Date Issued: May 22, 2020 Expiration Date: September 1, 2025

Location: 400 East 130th Street, Chicago, Cook County, 60628

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

utional Steam Generating Units, 40 CFR 60, Sabparts A and Dc. linois EPA is administering the NSPS in Illinois on behalf of the

- Four (4) 67.9 mmBtu/hour natural gas/digester gas-fired boilers (CBF Boilers Nos. 1, 2, 3 and 4);
- Four (4) 16.7 mmBtu/hr natural gas/digester gas-fired boilers (Digester Boilers Nos. 1, 2, 3, and 4);
- Two (2) 16.74 mmBtu/hr natural gas/digester gas-fired boilers (Digester Boilers Nos. 5 and 6);
- Two (2) natural gas-fired boilers (Centrifuge Boiler Nos. 1 & 2 (10.62 mmBtu/hr, total));
- Seven (7) natural gas-fired heating units (0.08715 mmBtu/hr, total);
- One (1) 0.75 mmBtu/hr natural gas-fired make-up air unit;
- Three (3) 14.63 mmBtu/hr digester flares (Flares Nos. 1, 2, and 3); and Four (4) 14.5 mmBtu/hr digester flares (Flares Nos. 4, 5, 6 and 7);

as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1. This federally enforceable state operating permit is issued:
- To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Carbon Monoxide (CO), Sulfur Dioxide (SO<sub>2</sub>), and 50 tons/year for Nitrogen Oxides  $(NO_x)$ ). As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit for  $NO_{x}$  to less than 100 tons per year so that the source is not subject to the

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requirements of 35 Ill. Adm. Code Part 217 Subpart E (Industrial Boilers.

- b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2. CBF Boilers Nos. 1, 2, 3 and 4 are subject to the New Source Performance Standard (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subparts A and Dc. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.40c(a), except as provided in 40 CFR 60.40c(d), (e), (f), and (g), the affected facility to which 40 CFR 60 Subpart Dc applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (mmBtu/hr)) or less, but greater than or equal to 2.9 MW (10 mmBtu/hr).
- 3a. CBF Boilers Nos. 1, 2, 3 and 4; Digester Boilers Nos. 1, 2, 3, 4, 5 and 6; Centrifuge Boiler Nos. 1 and 2, the natural gas-fired heating units, and the natural gas-fired make-up air unit are subject to 35 Ill. Adm. Code Part 212 Subpart B (Visible Emissions). Pursuant to 35 Ill. Adm. Code 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. The source is subject to 35 Ill. Adm. Code Part 212 Subpart K (Fugitive Particulate Matter). Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the source.
- d. Pursuant to 35 Ill. Adm. Code 212.302(b), in the geographical areas defined in 35 Ill. Adm. Code 212.324(a)(1), 35 Ill. Adm. Code 212.304 through 212.310, 212.312, and 212.316 shall apply to all emission units identified in 35 Ill. Adm. Code 212.302(a), and shall further apply to

the following operations: grain handling and grain drying (35 Ill. Adm. Code Part 212 Subpart S), transportation, communications, electric, gas, and sanitary services (SIC major groups 40 through 49). Additionally, 35 Ill. Adm. Code 212.304 through 212.310, 212.312, and 212.316 shall apply to wholesale trade farm supplies (SIC Industry No. 5191) located in the vicinity of Granite City, as defined in 35 Ill. Adm. Code 212.324(a)(1)(C).

- e. Pursuant to 35 Ill. Adm. Code 212.316(c), no person shall cause or allow fugitive particulate matter emissions from any roadway or parking area to exceed an opacity of 10 percent, except that the opacity shall not exceed 5 percent at quarries with a capacity to produce more than 1 million T/yr of aggregate.
- 4. CBF Boilers Nos. 1, 2, 3 and 4 and Digester Boilers Nos. 1, 2, 3, 4, 5 and 6 are subject to 35 Ill. Adm. Code Part 216 Subpart B (Fuel Combustion Emission Sources). Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.
- This permit is issued based on the boilers, the heating units, and the make-up air unit at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63 Subpart DDDDD because this source is not or is part of, a major source of HAP as defined in 40 CFR 63.2.
- b. This permit is issued based on the boilers at this source not being subject to the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 Subpart JJJJJJ. Pursuant to 40 CFR 63.11195(e), gas-fired boilers (includes any boiler that burns gaseous fuels) are not subject to 40 CFR 63 Subpart JJJJJJ.
- 6a. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- b. This permit is issued based on the natural gas-fired heating units and the natural gas-fired make-up air unit not being subject to 35 Ill. Adm. Code 212.324 (Process Emission Units in Certain Areas). Pursuant to 35 Ill. Adm. Code 212.324(d), the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c) shall not apply to those emission

units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, 35 Ill. Adm. Code 212.324(d) is not a defense finding of a violation of the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c).

- 7. This permit is issued based on the source not being subject to 35 Ill.

  Adm. Code Part 218 Subpart TT (Other Emission Units). Pursuant to 35

  Ill. Adm. Code 218.980(f), the control requirements in 35 Ill. Adm.

  Code Part 218 Subpart TT shall not apply to sewage treatment plants and fuel combustion units.
- Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 9a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
  - b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
  - c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
    - i. The name and address of the source;
    - ii. The name and address of the owner or operator responsible for execution of the operating program;
    - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;

- - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code Part 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
- vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. The Fugitive Particulate Operating Program, as submitted by the Permittee pursuant to Condition 10(b) dated April 21, 2020, is incorporated herein by reference. The source shall be operated under and shall comply with the provisions of this Fugitive Particulate Operating Program and any amendments to the Fugitive Particulate Operating Program submitted by the Permittee to Illinois EPA pursuant to Condition 9(b).
- e. The Fugitive Particulate Operating Program shall be amended from time to time by the Permittee so that the Fugitive Particulate Operating Program is current. Such amendments shall be consistent with Conditions 9(b) and 9(c) and shall be submitted to the Illinois EPA within thirty (30) days of any such amendment. Any future amendment to the Fugitive Particulate Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the Illinois EPA. In the event that the Illinois EPA notifies the Permittee of a deficiency with any amendment to the Fugitive Particulate Operating Program, the Permittee shall be required to revise and resubmit the Fugitive Particulate Operating Program within thirty (30) days of receipt of notification to address the deficiency.
- 10a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the nuisance.
  - b. The flares shall be in operation at all times with a flame present whenever there is flow to the flares.
  - c. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on all the flares such that the flares are kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- d. CBF Boilers Nos. 1, 2, 3 and 4 and Digester Boilers Nos. 1, 2, 3, 4, 5

and 6 shall only be operated with natural gas or digester gas as the fuel. The use of any other fuel in the CBF Boilers Nos. 1, 2, 3 or 4 or Digester Boilers Nos. 1, 2, 3, 4, 5 or 6 requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.

- e. Centrifuge Boiler Nos. 1 and 2, the heating units, and the make-up air unit shall only be operated with natural gas as the fuel. The use of any other fuel in Centrifuge Boiler Nos. 1 or 2, the heating units, or the make-up air unit requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 11a. Emissions from and operation of CBF Boilers Nos. 1, 2, 3 and 4;
  Digester Boilers Nos. 1, 2, 3, 4, 5 and 6; Centrifuge Boilers Nos. 1
  and 2, the 7 natural gas-fired heating units, and the natural gas-fired air make-up unit shall not exceed the following limits (combined) when combusting natural gas:

EPA DUKSUBI	Fuel	Usage	Emission Factor	Emissions'		
Pollutant	(106 scf/Mo)	$(10^6 \text{ scf/Yr})$	$(lbs/10^6 scf)$	(Tons/Mo)	(Tons/Yr)	
CO .	27.12	299.63	84.0	1.14	12.57	
NOx			100.0	1.36	14.98	
PM			7.6	0.10	1.14	
SO <sub>2</sub>	e consistent		0.6	0.01	0.09	
VOM	ted to the Il		5.5	0.07	0.82	

These limits are based on the maximum fuel usage, a heat content of 1020 Btu/scf for Natural gas and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

b. Emissions from and operation of CBF Boilers Nos. 1, 2, 3, and 4 and Digester Boilers Nos. 1, 2, 3, 4, 5 and 6 shall not exceed the following limits (combined) when combusting digester gas:

Fuel Usage		Emission Factor	Emissions		
Pollutant (	mmscf/Mo)	(mmscf/Yr)	(lbs/mmscf)	(Tons/Mo)	(Tons/Yr)
CO	59.67	716.04	50.4	1.50	18.04
NOx			60.0	1.79	21.48
PM			4.6	0.14	1.65
SO <sub>2</sub>			42.0	1.25	15.04
VOM			3.3	0.10	1.18

These limits are based on the maximum fuel usage and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998) adjusted based on a heat content of 600 Btu/scf for digester gas. The emission factor for  $SO_2$  is based upon stack testing of similar equipment.

c. Emission from and operation of the Digester Flares Nos. 1, 2, 3, 4, 5, 6 and 7 shall not exceed the following limits:

Fue		Usage	Emission Factor	Emissions		
Pollutant	(mmscf/Mo)	(mmscf/Yr)	(lbs/mmscf)	(Tons/Mo)	(Tons/Yr)	
CO	27.56	220.50	342.0	4.71	37.71	
NOx	Lormed upon		40.8	0.56	4.50	
SO <sub>2</sub>			42.0	0.58	4.63	
VOM			84.0	1.16	9.26	

These limits are based on the maximum fuel usage, a heat content of 600 Btu/scf for digester gas, and standard emission factors (Tables 13.5-1 and 13.5-2, AP 42, Fifth Edition, Volume I, April 2015). The emission factor  $SO_2$  is based upon stack testing of similar equipment.

- d. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 months total).
- 12. This permit is issued based on the Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program (CAAPP) Permit.
- 13a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
  - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
    - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including

scaffolding, but excluding instruments and sensing devices, as may be necessary.

- b. Testing required by Condition 14 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 14. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 15a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
  - b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
- 16a. i. Pursuant to 40 CFR 60.48c(g)(1), except as provided under 40 CFR 60.48c(g)(2) and (g)(3), the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.
  - ii. Pursuant to 40 CFR 60.48c(g)(2), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the  $SO_2$  standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.
  - iii. Pursuant to 40 CFR 60.48c(g)(3), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any

steam generating unit (including steam generating units not subject to 40 CFR 60 Subpart Dc) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO<sub>2</sub> standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

- b. Pursuant to 40 CFR 60.48c(i), all records required under 40 CFR 60.48 shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.
- Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- 18a. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
  - b. Pursuant to 35 Ill. Adm. Code 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm.

Code 212.316 shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of this Section and shall submit to the Illinois EPA an annual report containing a summary of such information.

- c. Pursuant to 35 Ill. Adm. Code 212.316(g)(2), the records required under 35 Ill. Adm. Code 212.316(g) shall include at least the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner and/or operator of the source;
- iii. A map or diagram showing the location of all emission units controlled, including the location, identification, length, and width of roadways;
- iv. For each application of water or chemical solution to roadways by truck: the name and location of the roadway controlled, application rate of each truck, frequency of each application, width of each application, identification of each truck used, total quantity of water or chemical used for each application and, for each application of chemical solution, the concentration and identity of the chemical;

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- v. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent, and, if diluted, percent of concentration, used each day; and
- vi. A log recording incidents when control measures were not used and a statement of explanation.
- d. Pursuant to 35 Ill. Adm. Code 212.316(g)(4), the records required under 35 Ill. Adm. Code 212.316 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
- 19a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. The Permittee shall keep a copy of the Fugitive Particulate
    Operating Program, any amendments or revisions to the Fugitive
    Particulate Operating Program, and the Permittee shall also keep
    a record of activities completed according to the Fugitive
    Particulate Operating Program.
    - ii. Amount of natural gas combusted at the source ( $10^6$  scf/month and  $10^6$  scf/year);
    - iii. Amount of digester gas combusted in CBF Boilers Nos. 1, 2, 3, and 4 and Digester Boilers Nos. 1, 2, 3, 4, 5 and 6 (106 scf/month and 106 scf/year);

- iv. Amount of digester gas combusted in Digester Flares Nos. 1, 2, 3, 4, 5, 6 and 7 ( $10^6$  scf/month and  $10^6$  scf/year); and
- v. Monthly and annual emissions of CO,  $NO_x$ , PM,  $SO_2$ , VOM and HAPs from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by Condition 19(a) of this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) 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 or USEPA request for records during the course of a source inspection.
- Pursuant to 40 CFR 60.7(a)(4), any owner or operator subject to the 20. provisions of 40 CFR Part 60 shall furnish the Illinois EPA or USEPA written notification or, if acceptable to both the Illinois EPA and USEPA and the owner or operator of a source, electronic notification, as follows: A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Illinois EPA or USEPA may request additional relevant information subsequent to this notice.
- 21a. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
  - b. Pursuant to 35 Ill. Adm. Code 212.316(g)(3), copies of all records required by 35 Ill. Adm. Code 212.316 shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA and shall be transmitted to the Illinois EPA by a company-designated person with authority to release such records.
  - c. Pursuant to 35 Ill. Adm. Code 212.316(g)(5), a quarterly report shall be submitted to the Illinois EPA stating the following: the dates any necessary control measures were not implemented, a listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information

includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of 35 Ill. Adm. Code 212.316. This report shall be submitted to the Illinois EPA thirty (30) calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.

- 22a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit or otherwise, the Permittee shall submit a report to the Illinois EPA's Bureau of Air Compliance Section in Springfield, Illinois within thirty (30) days after the exceedance or deviation. The report shall identify the duration and the emissions impact of the exceedance or deviation, a copy of the relevant records and information to resolve the exceedance or deviation, and a description of the efforts to reduce emissions from, and the duration of exceedance or deviation, and to prevent future occurrences of any such exceedance or deviation.
  - b. One (1) copy of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

It should be noted that the 6,000-gallon gasoline storage tank and the machining operation are exempt from permitting, pursuant to 35 Ill. Adm. Code 201.146(1) and (aa), respectively.

It should also be noted that this permit has been revised so as to remove the two (2) Ozone Generators and the TARP Boiler from this permit, both emission units were decommissioned out of service in 2015.

It should further be noted that the renewal of this permit is not necessary at this time since the original permit is still valid until September 1, 2025.

It should also further be noted that this permit has been revised so as to reduce the permitted  $NO_{\rm x}$  emissions from the source so that the source is not subject to 35 Ill. Adm. Code Part 203.

If you have any questions on this permit, please call Joseph Odele at 217/785-1705.

Raymond E. Pilapil

Manager, Permit Section

Bureau of Air

REP:JBO:tan

# STATE OF ILLINOIS INVIRONMENTAL PROTECTION AGENCY DÍVISION OF AIR POLLUTION CONTROL P. O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506



#### Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the water reclamation plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons/year for CO, SO<sub>2</sub>, and 50 tons/year for NO<sub>x</sub>) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

	EM	ISSI	ONS	(Tons/)	(ear)
Equipment	CO	$NO_{x}$	PM	SO <sub>2</sub>	VOM
Natural Gas Combustion in the 4 CBF Boilers,				-	-
6 Digester Boilers, 2 Centrifuge Boilers, 7					
Heating Units & 1 Make-up Air Unit	12.58	14.98		0.09	0.82
Digester Gas Combustion in the CBF Boilers		applica			
and Digester Boilers	18.04	21.48	1.65	15.04	1.18
Digester Flares	37.71	4.50	1340	4.63	9.26
Totals:	68.33	40.96	2.79	19.76	11.26

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o inspect, including during any nours of operation of equipment constructed or perated under this peratt, such equipment and any equipment required to be hope. Sed, operated, calibrated and saintained under this permit:

to enter and neitize any photographic, edecrating, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any nonzerty, discharge or emission authorized by this permits.

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## STANDARD CONDITIONS FOR OPERATING PERMITS

May, 1993

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

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

- 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 Unites States or the State of Illinois or with applicable local laws, ordinances and regulations.
- 2. 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 35 Ill. Adm. Code 201.166.
- 3. a. The Permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Illinois EPA and unless a new permit or revision of the existing permit(s) is issued for such modification.
  - b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.
- 4. The Permittee shall allow any duly authorized agent of the Illinois EPA, upon the presentation of credentials, at reasonable times:
  - a. To enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit;
  - b. To have access to and to copy any records required to be kept under the terms and conditions of this permit;
  - To inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit;
  - d. To obtain and remove samples of any discharge or emission of pollutants; and
  - e. To enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.
- 5. The issuance of this permit:
  - a. Shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located;

- b. Does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities;
- c. Does not take into consideration or attest to the structural stability of any unit or part of the project; and
- d. 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 proposed equipment or facility.
- 6. The facilities covered by this permit shall be operated in such a manner that the disposal of air contaminants collected by the equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.
- 7. The Permittee shall maintain all equipment covered under this permit in such a manner that the performance of such equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.
- 8. The Permittee shall maintain a maintenance record on the premises for each item of air pollution control equipment. These records shall be made available to any agent of the Environmental Protection Agency at any time during normal working hours and/or operating hours. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.
- 9. No person shall cause or allow continued operation during malfunction, breakdown or startup of any emission source or related air pollution control equipment if such operation would cause a violation of an applicable emission standard or permit limitation. Should a malfunction, breakdown or startup occur, which results in emissions in excess of any applicable standard or permit limitation, the Permittee shall:
  - a. Immediately report the incident to the Illinois EPA's Regional Field Operations Section Office by telephone, telegraph or other method as constitutes the fastest available alternative, and shall comply with all reasonable directives of the Illinois EPA with respect to the incident;
  - b. Maintain the following records for a period of no less than two (2) years:
    - i. Date and duration of malfunction, breakdown, or startup,
    - ii. Full and detailed explanation of the cause,
    - iii. Contaminants emitted and an estimate of quantity of emissions,
    - iv. Measures taken to minimize the amount of emissions during the malfunction, breakdown or startup, and
    - v. Measures taken to reduce future occurrences and frequency of incidents.
- 10. If the permit application contains a compliance program and project completion schedule, the Permittee shall submit a project completion status report within thirty (30) days of any date specified in the compliance program and project completion schedule or at six month intervals, whichever is more frequent.
- 11. The Permittee shall submit an Annual Emission Report as required by 35 Ill. Adm. Code 201.302 and 35 Ill. Adm. Code Part 254.