Illinois Environmental Protection Agency

Gasoline Bulk Plant or Terminal and Volatile Organic Liquid Storage Vessel(s)

This guide is intended for true minor sources only.

Air Permit Application Guide

What is a True Minor Source?

Air pollution sources whose potential to emit (PTE) is less than the major source annual emission thresholds are considered minor sources. Potential to Emit (PTE) is defined at Section 39.5 of the Illinois Environmental Protection Act and is used to predict the release of air contaminants from an emission source operating at its maximum rate capacity, 24 hours per day, 365 days a year.

A true minor air pollution source is one that, even operating at its maximum capacity and continuously, cannot exceed the major source annual emission threshold levels. A true minor source should not be confused with a synthetic minor source which is an air pollution source that has a Federally Enforceable State Operating Permit (FESOP) with conditions that legally restrict its PTE to below the threshold levels.

WHAT SHOULD YOUR PERMIT APPLICATION INCLUDE?

Cover Letter

- ✓ An overall description of a proposed plant or proposed additions/modifications to an existing plant;
- ✓ What type of facility the plant/terminal will receive the gasoline/other materials from, how the gasoline/other materials will be delivered to the plant/terminal (delivery vessel (tank truck, rail tank car, etc.), barge/ship, pipeline, etc.), and what type of facility/operation will the gasoline/other materials be distributed to;
- ✓ Whether the tanks at the plant/terminal will be/are subject to the requirements in **40 CFR Part 60 Subparts K, Ka, or Kb (Standards of Performance for Storage Vessels) or Subpart XX (Standards of Performance for Bulk Gasoline Terminals)**, and **if so**:
  - o whether the tank(s) will comply with the applicable Subpart K, Ka, Kb, or XX requirements;
- ✓ Whether the tanks and the loading rack(s) at the plant/terminal will be/are subject to the requirements in **40 CFR Part 63 Subparts R (National Emission Standards For Gasoline Distribution Facilities: Bulk Gasoline Terminals and Pipeline Breakout Stations) or BBBBBB (National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities)**, and **if so**:
  - o whether the tank(s) and the loading rack(s) will comply with the applicable **Subpart R or BBBBBB** requirements;
- ✓ Whether the tanks and the loading rack(s) at the plant/terminal will be/are subject to the requirements in **35 Ill. Adm. Code 215/218/219.122, 215/218/219.301, and 215/218/219.581 or .582**, and **if so**:
  - o whether the tank(s) and the loading rack(s) will comply with the applicable requirements;
- ✓ Whether gasoline will be dispensed into the fuel tank of a motor vehicle at the facility, and if so:
  - o a description of how the gasoline will be loaded into the storage tanks at the source for gasoline dispensing purposes and whether the gasoline dispensing facility portion of the source will comply with the applicable requirements of **40 CFR Part 63 Subpart CCCCCC (National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities)**;
  - o whether the gasoline dispensing facility storage tank filling operations will comply with the applicable requirements of **35 Ill. Adm. Code 215/218/219.583**; and
- ✓ Whether the site has an existing Illinois EPA air operating permit. If it does, indicate in cover letter if the existing operating permit is still representative of existing conditions at the site or if changes need to be made to the operating permit due to changes at the site since the existing operating permit was issued.

Description of the Operation

A written summary and/or table(s) that describes or identifies the following as it exists and is proposed:

- ✓ Number, maximum rated capacity, and material of construction of each tank, and whether aboveground or belowground;
- ✓ Number and maximum rated capacity of each loading rack;
- ✓ Date(s) of construction and modification of each tank and loading rack;
- ✓ Type (gasoline, etc.) and physical/chemical characteristics (vapor pressure, etc.) of material to be stored in each tank;
- ✓ Type (gasoline, etc.) and physical/chemical characteristics (vapor pressure, etc.) of material to be processed in each loading rack;
- ✓ Maximum calculated design throughput of the plant in gallons per day (identify plant component/feature that limits the calculated maximum throughput);
- ✓ Pollution control equipment (delivery vessel and stationary storage tank vapor collection system, stationary tank permanent submerged loading pipe(s), submerged filling or bottom loading of delivery vessel, stationary storage tank vapor control system, etc.);
- ✓ The calculations (include emission factors/input data used) for the potential to emit (PTE) of volatile organic material (VOM) and hazardous air pollutants (HAPs) in tons per year for the entire source, including emissions from the tanks (filling the tanks and tank storage emissions) and from the loading rack(s) (filling delivery/transfer vessels); and
- ✓ The requested maximum actual annual and hourly emissions of VOM and HAPs for the entire source (including tanks and loading racks), and the corresponding requested maximum throughput of gasoline/other material associated with those requested maximum actual emissions that you propose to be included in your permit as permit conditions.

Plot Plan/Flow Diagram:*

- ✓ Illustrate all existing and proposed emission units (tanks, loading racks, etc.) and pollution control equipment (vapor collection system, vapor control system, etc.) at the source;
- ✓ Each item should be labeled by name or unique identifier;
- ✓ Differentiate between existing and proposed items;
- ✓ Identify site location, location of the emission units and pollution control equipment, site property boundaries, and surrounding land use, and if applicable, existing emission units/pollution control equipment;

*Sketch drawing or block diagram is sufficient (doesn't have to be to scale)

Application Forms:

The forms can be obtained on the Illinois EPA website at: www.epa.state.il.us/air/stateforms/

- ☐ APC-629: Application for a Permit to Construct and/or Operate;
- ☐ APC-232: Tank Process Emission Source Addendum;
- ☐ 197-FEE: Fee Determination for Construction Permit Application if you are requesting a Construction Permit

(Please make sure a check in the appropriate amount is also included with the completed 197-Fee form);

Send two copies of your application (three if located in Cook County) to:

Bureau of Air Permit Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East,
P.O. Box 19506
Springfield, IL 62794-9506

Questions?
If you have any questions regarding air permitting, please contact the **Illinois EPA Air Permit Section at 217-785-1705** or the **Illinois Small Business Environmental Assistance Program at 800-252-3998.**

Registration of Smaller Sources (ROSS): Effective December 2011, true minor sources with low *actual* emissions may be eligible to participate in the mandatory Registration of Smaller Sources (ROSS) program identified at 35 Ill. Adm. Code 201.175. Sources who can meet the following emission criteria as well as other eligibility criteria must register under the ROSS program in lieu of acquiring or maintaining an air pollution control permit:

- 5.0 Tons/yr of combined pollutants (particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide and volatile organic material)
  - 0.50 Tons/yr of combined Hazardous Air Pollutants (HAPs)
  - 0.05 Tons/yr of mercury air emissions
  - 0.05 Tons/yr of lead air emissions

For more information regarding the ROSS program including a complete list of the eligibility criteria visit www.ienconnect.com/enviro or contact the Illinois Small Business Environmental Assistance Program at 1-800-252-3998.