Sterigenics®
A Sotera Health company

June 24, 2019

Division of Air Pollution Control-Permit Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

Re: Construction Permit Application for Sterigenics Willowbrook Facility I.D. No: 043110AAC

To Whom It May Concern:

This letter and its attachments constitute Sterigenics' Construction Permit Application for additional capture and control equipment in our Willowbrook facility. The proposed alterations to our Willowbrook I facility include the following improvements:

- Connection of the existing DeOxx Scrubber System to the AAT control system
- Installation of a new, additional polisher dry bed control system to the outlet of the existing AAT control system
- Installation of a permanent total enclosure system covering all process areas, resulting in 100% capture of all emissions and directing the captured emissions to a new AAT dry bed control system
- Use of one common stack from the facility for all post-control emissions

Enclosed are the necessary permit application forms and supplemental information for the proposed modification to reduce our emissions of Ethylene Oxide (EO) and Propylene Oxide (PO). We have also enclosed a check for five hundred dollars ($500) along with the Fee Determination Form 197.

We also point out two additional features of the permit application. First, the application proposes to measure EO concentrations, in addition to existing methods, with a new continuous emissions monitoring system (CEMS). As IEPA is aware, we have proposed use of a CEMS even though no CEMS has been demonstrated as applied to a sterilization facility like our Willowbrook plant. We look forward to working with IEPA to gain field experience with such systems in the sterilization industry. To make this effort successful, we will need to work cooperatively with IEPA and the manufacturer. We expect that the permit will contain appropriate terms that reflect these efforts.

Second, we have included in the application the information necessary for IEPA to provide the certification, as part of the new legislation, that, once construction is complete, the facility will be using the technology that provides the greatest reduction in EO emissions that is now available. You will see in this application that the improvements we propose clearly meet the standard in this legislation. We request that IEPA make this certification in conjunction with issuing the construction

2015 Spring Road Ste 650 Oak Brook, IL 60523
630.928.1700 | sterigenics.com

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permit, either as part of the permit or in a separate communication made at the time the permit is issued.

Please do not hesitate to contact me to further discuss this matter. You can reach me at 630-928-1771 or email: kwagner@sterigenics.com.

Best Regards,

Kevin Wagner
Director, Environmental Health & Safety

Enclosures: Permit Application Package

2015 Spring Road Ste 650 Oak Brook, IL 60523
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Illinois Environmental Protection Agency
Division Of Air Pollution Control – Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Construction Permit Application for a Proposed Project at a CAAPP Source	For Illinois EPA use only
	ID No.:
	Appl. No.:
	Date Rec'd:
	Chk No./Amt:

This form is to be used to supply general information to obtain a construction permit for a proposed project involving a Clean Air Act Permit Program (CAAPP) source, including construction of a new CAAPP source. Detailed information about the project must also be included in a construction permit application, as addressed in the "General Instructions For Permit Applications," Form APC-201.

Proposed Project

1. Working Name of Proposed Project:
Willowbrook I Additional Capture and Control Equipment

2. Is the project occurring at a source that already has a permit from the Bureau of Air (BOA)?
☐ No ☒ Yes If Yes, provide BOA ID Number: 043110AAC

3. Does this application request a revision to an existing construction permit issued by the BOA?
☐ No ☒ Yes If Yes, provide Permit Number: ____

4. Brief Description of Proposed Project:
Duct the Deoxx Scrubber system (Scrubber #1) exhaust to the inlet of the AAT Scrubber system (Scrubber #2 with dry Beds) to further control emissions. Install additional Dry Beds (Polisher) after AAT Scrubber system. Install permanent total enclosure with a third dry bed system. Route all emissions to a single common stack.

Source Information

1. Source name:* Sterigenics US LLC

2. Source street address:* 7775 Quincy Street

3. City: Willowbrook	4. County: DuPage	5. Zip code:* 60527

ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN ID NUMBER

6. Is the source located within city limits? ☒ Yes ☐ No
If no, provide Township Name:

7. Description of source and product(s) produced: Commercial Sterilizer of medical products	8. Primary Classification Code of source: SIC: 7389 or NAICS: 561910
9. Latitude (DD:MM:SS.SSSS): 41.748139	10. Longitude (DD:MM:SS.SSSS): -87.940504

* Is information different than previous information? ☐ Yes ☒ No
If yes, then complete Form CAAPP 273 to apply for an Administrative Change to the CAAPP Permit for the source.

Identification of Permit Applicant

1. Who is the applicant? ☒ Owner ☐ Operator	2. All correspondence to: (check one) ☐ Source ☒ Owner ☐ Operator
3. Applicant's FEIN: 95-3323502	4. Attention name and/or title for written correspondence: Kevin Wagner, Director EH&S

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.

Owner Information*

1. Name: Sterigenics US, LLC		
2. Address: 2015 Spring Road, Suite 650		
3. City: Oak Brook	4. State: IL	5. Zip code: 60523

* Is this information idifferent than previous information? ☐ Yes ☒ No
If yes, then complete Form CAAPP 273 to apply for an Administrative Change to the CAAPP Permit for the source.

Operator Information (if different from owner)*

1. Name Sterigenics US, LLC		
2. Address: 7775 Quincy Street		
3. City: Willowbrook	4. State: IL	5. Zip code:

* Is this information different than previous information? ☐ Yes ☐ No
If yes, then complete Form CAAPP 273 to apply for an Administrative Change to the CAAPP Permit for the source.

Technical Contacts for Application

1. Preferred technical contact: (check one) ☒ Applicant's contact ☐ Consultant	
2. Applicant's technical contact person for application: Kevin Wagner	
3. Contact person's telephone number(s) 630-928-1700	4. Contact person's e-mail address: kwagner@sterigenics.com
5. Consultant for application: n/a	
6. Consultant's telephone number(s): n/a	7. Consultant's e-mail address: n/a

Other Addresses for the Permit Applicant

ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN ID NUMBER.

1. Address for billing Site Fees for the source: ☐ Source ☐ Other (provide below):	
2. Contact person for Site Fees:	3. Contact person's telephone number:
4. Address for Annual Emission Report for the source: ☐ Source ☐ Other (provide below):	
5. Contact person for Annual Emission Report:	6. Contact person's telephone number:

Review Of Contents of the Application	
NOTE: ANSWERING "NO" TO THESE ITEMS MAY RESULT IN THE APPLICATION BEING DEEMED INCOMPLETE	
1. Does the application include a narrative description of the proposed project?	☒ Yes ☐ No
2. Does the application clearly identify the emission units and air pollution control equipment that are part of the project?	☒ Yes ☐ No
3. Does the application include process flow diagram(s) for the project showing new and modified emission units and control equipment, along with associated existing equipment and their relationships?	☒ Yes ☐ No
4. Does the application include a general description of the source, a plot plan for the source and a site map for its location?	☐ Yes ☐ No ☒ N/A* * Material previously provided
5. Does the application include relevant technical information for the proposed project as requested on CAAPP application forms (or otherwise contain all relevant technical information)?	☒ Yes ☐ No
6. Does the application include relevant supporting data and information for the proposed project as provided on CAAPP forms?	☒ Yes ☐ No
7. Does the application identify and address all applicable emission standards for the proposed project, including: State emission standards (35 IAC Chapter I, Subtitle B); Federal New Source Performance Standards (40 CFR Part 60)?	☒ Yes ☐ No
8. Does the application address whether the project would be a major project for Prevention of Significant Deterioration, 40 CFR 52.21?	☒ Yes ☐ No ☐ N/A
9. Does the application address whether the project would be a major project for "Nonattainment New Source Review," 35 IAC Part 203?	☒ Yes ☐ No ☐ N/A
10. Does the application address whether the proposed project would potentially be subject to federal regulations for Hazardous Air Pollutants (40 CFR Part 63) and address any emissions standards for hazardous air pollutants that would be applicable?	☒ Yes ☐ No ☐ N/A* * Source not major ☐ Project not major ☐
11. Does the application include a summary of annual emission data for different pollutants for the proposed project (tons/year), including: 1) The requested permitted emissions for individual new, modified and affected existing units*, 2) The past actual emissions and change in emissions for individual modified units* and affected existing units*, and 3) Total emissions consequences of the proposed project? (* Or groups of related units)	☐ Yes ☐ No ☒ N/A * The project does not involve an increase in emissions from new or modified emission units.
12. Does the application include a summary of the current and requested potential emissions of the source (tons/year)?	☐ Yes ☐ No ☒ N/A* * Applicability of PSD, NA NSR or 40 CFR 63 to the project is not related to the source's emissions.
13. Does the application address the relationships and implications of the proposed project on the CAAPP Permit for the source?	☒ Yes ☐ No ☐ N/A* * CAAPP Permit not issued
14. If the application contains information that is considered a TRADE SECRET, has it been properly marked and claimed and all requirements to properly support the claim pursuant to 35 IAC Part 130 been met? Note: "Claimed" information will not be legally protected from disclosure to the public if it is not properly claimed or does not qualify as trade secret information.	☐ Yes ☐ No ☒ N/A* * No information in the application is claimed to be a TRADE SECRET
15. Are the correct number of copies of the application provided? (See Instructions for Permit Applications, Form 201)	☒ Yes ☐ No
16. Does the application include a completed "FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION," Form 197-FEE, a check in the amount indicated on this form, and any supporting material needed to explain how the fee was determined?	☒ Yes ☐ No

Signature Block

Authorized Signature:

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 and that I am a responsible official for the source, as defined by Section 39.5(1) of the Environmental Protection Act.

BY: KA Hoffman

AUTHORIZED SIGNATURE

Sr. Vice-President EH&S and Tech Svcs.

TITLE OF SIGNATORY

Kathleen Hoffman

TYPED OR PRINTED NAME OF SIGNATORY

June 24 2019

DATE

Illinois Environmental Protection Agency

Bureau of Air • 1021 North Grand Avenue East • P.O. Box 19506 • Springfield • Illinois • 62794-9506

FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION

FOR AGENCY USE ONLY

ID Number: _____ Permit #: _____

☐ Complete ☐ Incomplete Date Complete: _____

Check Number: _____ Account Name: _____

This form is to be used to supply fee information that must accompany all construction permit applications. This application must include payment in full to be deemed complete. Make check or money order payable to the Illinois Environmental Protection Agency, Division of Air Pollution Control - Permit Section at the above address. Do NOT send cash. Refer to instructions (197-INST) for assistance.

Source Information

1. Source Name: Sterigenics US, LLC
2. Project Name: Improvement to Emission Controls
3. Source ID #: (if applicable) 043110AAC
4. Contact Name: Kevin Wagner
5. Contact Phone #: 630-928-1700

Fee Determination

6. The boxes below are automatically calculated.

Section 1 Subtotal $0.00 + Section 2, 3 or 4 Subtotal $500.00 = $500.00 Grand Total

Section 1: Status of Source/Purpose of Submittal

7. Your application will fall under only one of the following five categories described below. Check the box that applies. Proceed to applicable sections. For purposes of this form:

- **Major Source** is a source that is required to obtain a CAAPP permit.
- **Synthetic Minor Source** is a source that has taken limits on potential to emit in a permit to avoid CAAPP permit requirements (e.g.,FESOP).
- **Non-Major Source** is a source that is not a major or synthetic minor source.

☑ Existing source without status change or with status change from synthetic minor to major source or vice versa. Proceed to Section 2.

☐ Existing non-major source that will become synthetic minor to major source. Proceed to Section 4.

☐ New major or synthetic minor source. Proceed to Section 4.

☐ New non-major source. Proceed to Section 3.

☐ AGENCY ERROR. If this is a timely request to correct an issued permit that involves only an agency error and if the request is received within the deadline for a permit appeal to the Pollution Control Board. Skip Sections 2, 3 and 4. Proceed directly to Section 5.

$0.00 Section 1 Subtotal

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.

Section 2: Special Case Filing Fee

8. **Filing Fee.** If the application only addresses one or more of the following, check the appropriate boxes, skip Sections 3 and 4 and proceed directly to Section 5. Otherwise, proceed to Section 3 or 4 as appropriate.

☑ Addition or replacement of control devices on permitted units.

☐ Pilot projects/trial burns by a permitted unit

☐ Land remediation projects

☐ Revisions related to methodology or timing for emission testing

☐ Minor administrative-type change to a permit

$500.00

Section 3: Fees for Current or Projected Non-Major Sources

9. This application consists of a single new emission unit or no more than two modified emission units. ($500 fee)

10. This application consists of more than one new emission unit or more than two modified units. ($1,000 fee)

11. This application consists of a new source or emission unit subject to Section 39.2 of the Act (i.e., Local Siting Review); a commercial incinerator or a municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or an emission unit designated as a complex source by agency rulemaking. ($15,000 fee)

12. A public hearing is held (see instructions). ($10,000 fee)

13. Section 3 subtotal. (lines 9 through 12 - entered on page 1) 13. $0.00

Section 4: Fees for Current or Projected Major or Synthetic Minor Sources

Application contains modified emission units only	14. For the first modified emission unit, enter $2,000.	
	15. Number of additional modified emission units = x $1,000.	
	16. Line 14 plus line 15, or $5,000, whichever is less.	16. $0.00
Application contains new and/or modified emission units	17. For the first new emission unit, enter $4,000.	
	18. Number of additional new and/or modified emission units = x $1,000.	
	19. Line 17 plus line 18, or $10,000, whichever is less.	19. $0.00
Application contains netting exercise	20. Number of individual pollutants that rely on a netting exercise or contemporaneous emissions decrease to avoid application of PSD or nonattainment area NSR = x $3,000.	20. $0.00
Additional Supplemental Fees	21. If the new source or emission unit is subject to Section 39.2 of the Act (i.e. siting); a commercial incinerator or other municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or one or more other emission units designated as a complex source by Agency rulemaking, enter $25,000.	
	22. If the source is a new major source subject to PSD, enter $12,000.	
	23. If the project is a major modification subject to PSD, enter $6,000.	
	24. If this is a new major source subject to nonattainment area (NAA) NSR, enter $20,000.	
	25. If this is a major modification subject to NAA NSR, enter $12,000.	
	26. If the application involves a determination of MACT for a pollutant and the project is not subject to BACT or LAER for the related pollutant under PSD or NSR (e.g., VOM for organic HAP), enter $5,000 per unit for which a determination is requested or otherwise required. x $5,000.	26. $0.00
	27. If a public hearing is held (see instructions), enter $10,000.	
28. Section 4 subtotal (line 16 and lines 19 through 28) to be entered on page1		28. $0.00

Section 5: Certification

NOTE: Applications without a signed certification will be deemed incomplete.

29. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the information contained in this fee application form is true, accurate and complete.

by: _____ Director, EH&S

Signature — Title of Signatory

Kevin Wagner — Jun 24, 2019

Typed or Printed Name of Signatory — Date

Table of Contents

Willowbrook I Improvements to Emissions Capture and Control Systems

EXHIBIT 199-1

NARRATIVE DESCRIPTION OF PROPOSED PROJECT

IMPROVEMENTS TO EMISSIONS CAPTURE AND CONTROL SYSTEMS

This application addresses improvements to the Willowbrook I facility located at 7775 Quincy Street, Willowbrook, Illinois. All associated equipment and processing areas associated with sterilant use are covered under our current CAAPP Permit #95120085.

Overview of Sterigenics Willowbrook Facility

Sterigenics operates a commercial contract sterilization facility in Willowbrook, IL.

This application addresses improvements to the emission control measures at Willowbrook I facility. It does not address the nearby, smaller, Willowbrook II facility (If improvements are proposed for that facility, they would be the subject of a separate, future application).

Sterigenics' Willowbrook I facility utilizes ethylene oxide to sterilize customers' product. It also has the ability to use propylene oxide to treat spices and nutmeats. Ethylene oxide and propylene oxide are sterilants that regulatory agencies such as the U.S. Food and Drug Administration and U.S. Environmental Protection Agency (administering the Federal Insecticide, Fungicide, and Rodenticide Act) allow to be used on products. In addition, medical devices must meet a certain level of sterility as regulated by U.S. Food and Drug Administration and other regulatory agencies.

When ethylene oxide is used for medical device sterilization, the medical devices must have a specifically defined sterilization process, which is validated for a specific sterilization chamber or chambers. The Willowbrook I facility uses fourteen sterilization chambers ranging in size from 1 pallet up to 13 pallets. While all fourteen sterilization chambers are similar in design, each chamber may only process products approved for that chamber and cannot process other products that have not been validated and approved by the appropriate regulatory agency for that specific chamber.

As a contract sterilization facility, Willowbrook I sterilizes many different products from many different customers. Typical products sterilized on a daily basis at the facility include surgical procedure kits, syringes and catheters.

Purpose of Project

The purpose of the project is to further reduce ethylene oxide emissions from the sterilization process by adding additional controls; this project is being undertaken even though the facility has historically been in compliance with existing regulations and permit conditions. The project also will position the facility to meet new requirements in state legislation that were recently

signed into law. Sterigenics is not proposing to change the actual sterilization process at the Willowbrook I facility.

Description of Sterilization Process

The Willowbrook I facility performs sterilization operations for many customers. Each product has specific requirements which specify details of the sterilization process to be followed.

Receiving and Pre-Conditioning

Customers ship packaged products to Sterigenics. Once the product is received, the sterilization process follows the same flow through the facility. The first step after receipt of the product is to place the product into a preconditioning room. Preconditioning rooms are enclosed rooms which are heated and maintained at high humidity to prepare the product for sterilization. The product is in the preconditioning room for the time required for the specific product. No ethylene oxide is introduced or present in this step of the process.

Once preconditioning is complete, the product is moved to the appropriate sterilization chamber. There are fourteen sterilization chambers. A chamber is sized based on the number of pallets that it can hold and range from one pallet to thirteen pallets. Once the product is loaded into the chamber, the chamber is closed and sealed. At the beginning of each sterilization cycle, safety checks are performed to ensure ethylene oxide does not escape from the chamber during the cycle. In addition, the cycle is monitored to ensure that vacuum is maintained within acceptable parameters.

Drum Storage

At Willowbrook I, ethylene oxide is stored in sealed drums in an outside storage area before use. The drums are U.S. Department of Transportation rated UN 1A1 containers. The storage area complies with the requirements of NFPA 55 Chapter 14 for an outside storage area. No dispensing takes place in the drum storage area. To dispense ethylene oxide, the drums are moved with a drum cart from the storage area to the dispensing stations located inside the chamber room areas. Once in place at the dispensing station, the ethylene oxide drum is connected to the dispensing system for the specific sterilization chamber.

Chamber Operation, Vacuum Pump Emissions

As mentioned above, there is a validated cycle for each product. This validated cycle must meet specific regulatory requirements and will detail the times, parameters, and testing required for each product and the specific chamber approved. The sterilization process begins with evacuating the air from the chamber and introducing nitrogen. While under negative pressure inside the chamber, ethylene oxide is introduced into the sterilization chamber to sterilize the

product. Once ethylene oxide is introduced, the dwell stage can last from 30 minutes up to several hours according to the validated cycle for the product. Once complete, the sterilization chamber vacuum pumps remove most of the ethylene oxide from the chamber by exhausting and purging with nitrogen multiple times. Vacuum pump emissions are routed to the Deoxx wet acid scrubber. The Deoxx scrubber (WBI Acid Scrubber #1) currently is exhausted to a dedicated stack.

Backvents and Aeration Emissions

Once the sterilization chamber process is complete and the chamber door is partially opened, the back vent fan activates to extract residual amounts of ethylene oxide from the chamber. This fan remains on while the chamber door is open. After fifteen minutes, the pallets of product are removed from the sterilization chamber and placed into aeration rooms to further off-gas residual ethylene oxide. Both the backvents and aeration rooms are ducted to an existing AAT wet acid scrubber (WB1-Scrubber #2) and treated with 16 dry bed reactors. The AAT wet acid scrubber with dry beds currently exhausts to a dedicated stack.

Proposed Project Detail

This permit application proposes to make the following improvements to the existing capture and control equipment and to reduce the ethylene oxide emissions from the Willowbrook I facility. With these improvements, the facility will have technology that provides the greatest reduction in ethylene oxide emissions that is now available.

1) Currently the existing Willowbrook I Deoxx acid scrubber (WBI Acid Scrubber #1) exhausts to atmosphere via a dedicated stack. Sterigenics proposes to duct the outlet of the WB1 Acid Scrubber #1 to the existing Advanced Air Technologies (AAT) wet acid scrubber with dry bed reactor (WB1-Scrubber #2) to further reduce vacuum pump emissions.
2) The existing WBI-Scrubber #2 discharge currently is treated with 16 dry bed reactors and exhausts to atmosphere. Sterigenics proposes to install an additional dry bed reactor system with 16 additional dry beds at the outlet of the existing dry beds to serve as a polishing unit. These dry beds are designated 'Polisher Dry Beds'.
3) An additional capture and control system is proposed to capture air internally from chamber rooms, dispensing stations, work aisles, processed product storage, and shipping areas. With this capture and control system, the facility will have permanent total enclosure. Captured air will be ducted to a new dry bed control system consisting of 18 dry beds. These dry beds are designated as 'Permanent Total Enclosure Dry Beds'.
4) All gas streams (from WBI Polisher Dry Beds and the WBI Permanent Total Enclosure Dry Beds) will be routed to a single common stack. In addition, the single common stack will

have a continuous emissions monitoring system (CEMS) to measure the concentration of ethylene oxide in the exhaust stream.

In addition to these capture and control improvements, Sterigenics requests a reduction in the ethylene oxide usage limitation for the Willowbrook I facility from 840,000 pounds per year to 300,000 pounds per year.

Sterigenics also requests to operate the facility under this construction permit until its CAAPP permit is revised to address this proposal.

Control Efficiencies and Emission Estimates

The Deoxx wet acid scrubber controls the sterilization chamber vacuum pump emissions. The Deoxx scrubber has a control efficiency greater than 99%. The AAT Scrubber with dry beds controls the aeration and back vent emissions. This project is proposing to route the outlet of the Deoxx wet scrubber to the AAT scrubber with dry beds. The AAT scrubber dry beds have a control efficiency greater than 99% destruction efficiency. This project is also proposing to add additional dry beds and route the outlet of the AAT scrubber with dry beds to the new polishing dry beds. The polishing dry beds will consist of 16 additional dry beds. The polishing dry beds are designed to meet a 99% destruction efficiency.

Collectively, these combined emission control systems will achieve a control efficiency of at least 99.9% or reduce outlet gases to no more than 0.2 ppm by volume, so as to be able to comply with SB 1852.

On an annual basis, future emissions of ethylene oxide should be no more than 85 pounds per year. This is based on the IL EPA stated Continuous Emission Monitoring System (CEMS) detection limit of 40 parts per billion (ppb).

Continuous Emission Monitoring (CEMS)

Sterigenics proposes to install a continuous emissions monitor (CEM) for ethylene oxide. The CEM will use Fourier-transform infrared (FTIR) spectroscopy with a band-pass filter to improve the detection limits, such as a Max Analytical Technologies MAX StarBoost. The system will be designed to meet the requirements of US EPA's Performance Specification 15. The stack will also be equipped with a flow meter to allow calculation of mass emissions. The analyzer will be connected to a data acquisition system (DAS) that will record the concentration and flow rates at least once per minute, and calculate running 3-hour averages of the concentration and mass flow.

Sterigenics PTE Description

At Willowbrook I, Sterigenics will make improvements to have a Permanent Total Enclosure, compliant with US EPA's Method 204 - Criteria for and Verification of a Permanent or Temporary Total Enclosure (PTE). To accomplish this, several interior structures will be installed. An additional dry bed system will also be installed, which will draw additional air into the building through natural draft openings (NDO), sufficient to establish inward air velocities through the NDOs that exceed 200 feet per minute (fpm).

Compliance Demonstration with Method 204 Criteria for PTE

Tables 1 and 2 below show the relevant parameters:

Table 1 - Evaluation of Natural Draft Openings		
Access Door #1	21	square feet
Access Door #2	21	square feet
Access Door #3 (3' 6"X 7'-0")	25	square feet
Loading Through Two Dock Doors 8'x10' with 50% effective seals (Normal practice is to only load one truck at a time through one door)	80	square feet
Incidental Gaps and Holes	10	square feet
Total	157	square feet

Table 2 - Evaluation of Method 204 Compliance – Sterigenics Willowbrook I		
Net flowrate with fans at design capacity	33,500	CFM
Total surface area of enclosure	89,040	sf
Total building open area	157	sf
Total building % open area[1]	0.18%	-

Average Face velocity [2]	214	fpm
1. Percent open area = (open area) /(total building surface area)		
2. Face velocity= (design flowrate)/ (area of natural draft openings).		

Review of Criteria for Permanent Total Enclosure

Criterion No. 1: Any NDO shall be located at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.

Evaluation: This criterion is met by the main processing areas; the criterion is not appropriate for the shipping dock doors while loading product into the truck.

Criterion No. 2: The total area of the NDOs must be less than 5 percent of the enclosure surface area.

Evaluation: The enclosure surface area is shown in Table 1 above. The building open area is 0.18%, and easily complies with the criterion.

Criterion No. 3: The average face velocity of air through all NDOs shall be at least 200 feet per minute and in the direction of flow into the enclosure.

Evaluation: The air flow into the building through the NDOs will be 33,500 cubic feet per minute, and the maximum NDO area will be 157 square feet, providing an inward velocity of 214 feet per minute.

Criterion No. 4: All doors and windows whose areas are not accounted for in Criterion No. 2 are kept closed during normal operation and, therefore, are not included in the calculation for Criterion No. 3.

Evaluation: Sterigenics will maintain all doors and windows not covered in Criterion No. 3 closed during normal operations and therefore Criterion 4 is satisfied.

Sterigenics will install two pressure monitoring devices. These devices will verify compliance with 0.007 inches of water limit.

Criterion No. 5: *All VOCs emitted within the PTE are delivered to an air pollution control device in order to meet this criterion.*

Evaluation: All VOCs emitted within the PTE will be ducted to pollution control devices, as described in this permit application, and hence the facility will comply.

Sterigenics.

POND

EPA 204 BOUNDARY - WILLOWBROOK 1

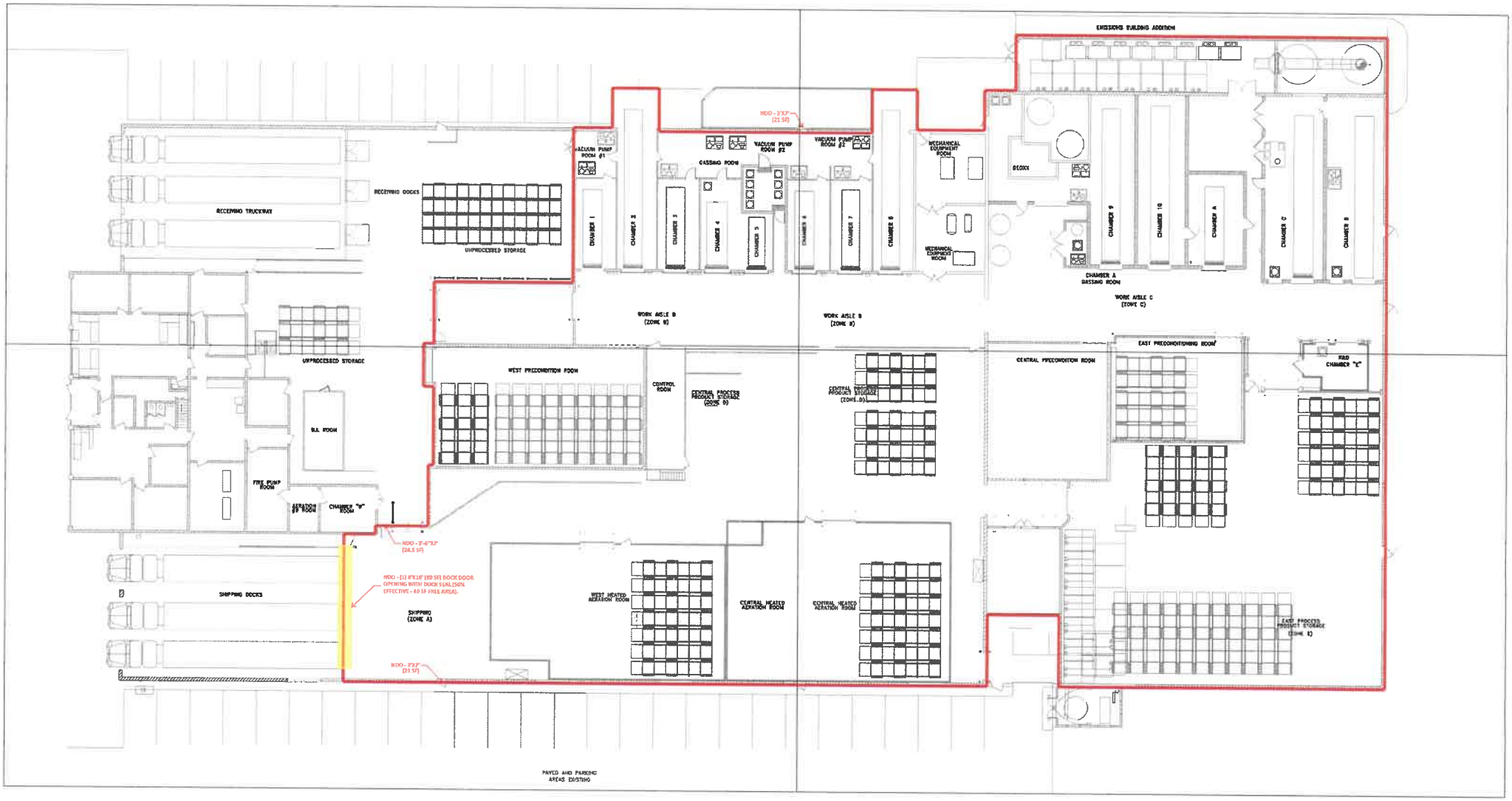
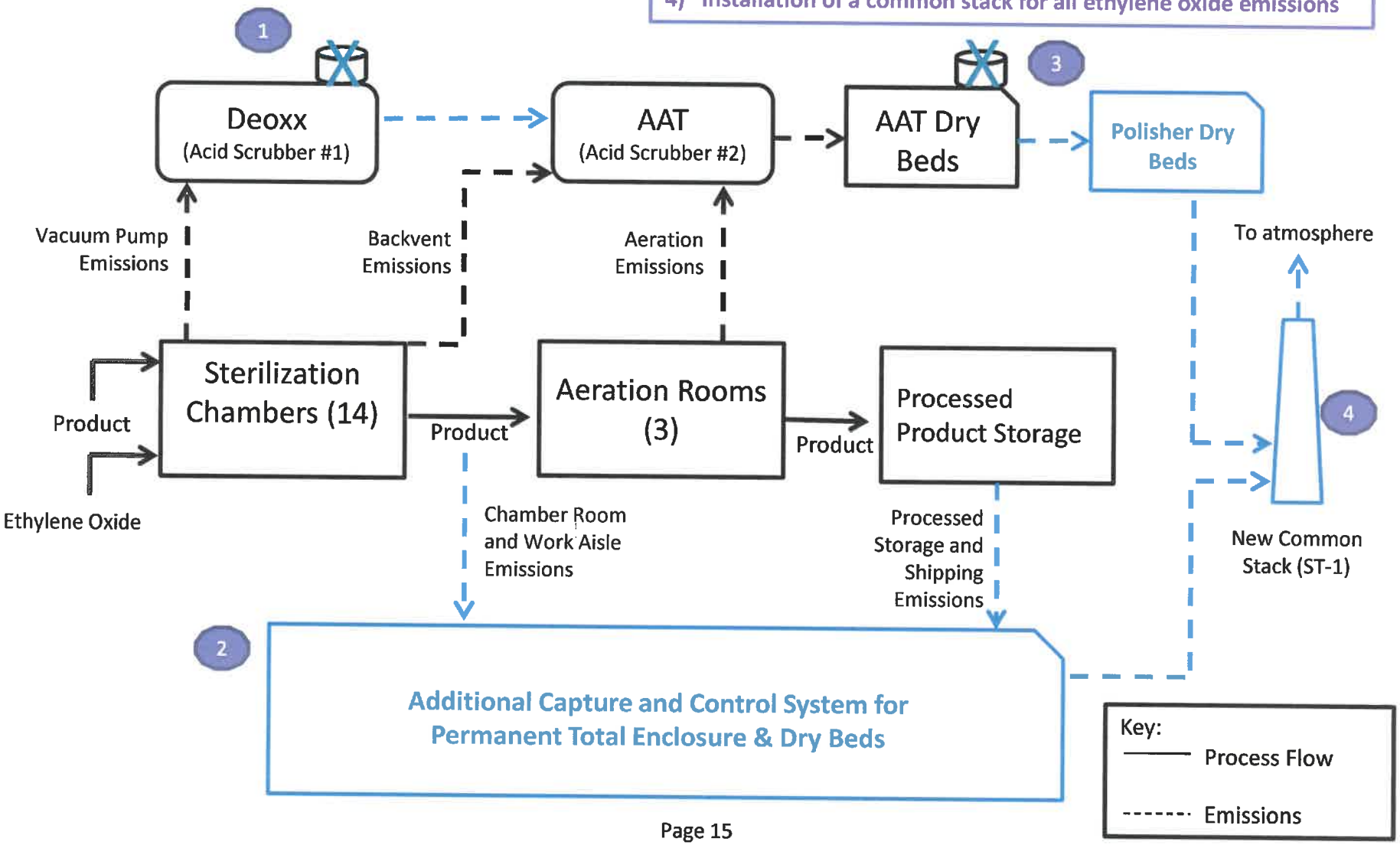


Exhibit 199-2: Proposed Willowbrook I Process Flow Diagram
(Changes noted in Blue)

Additional Capture/Control Equipment:

1) Route Deoxx emissions to AAT Scrubber #2 and eliminate Deoxx stack
2) Installation of capture and control system for Permanent Total Enclosure.
3) Install Drybed-Polisher and eliminate AAT scrubber stack
4) Installation of a common stack for all ethylene oxide emissions



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE
Revision #: 0
Date: 6 / 18 / 2019
Page 16 of 70
Source Designation: Sterilizers

PROCESS EMISSION UNIT DATA AND INFORMATION

FOR AGENCY USE ONLY
ID NUMBER:
EMISSION POINT #:
DATE:

SOURCE INFORMATION

1) SOURCE NAME:
Sterigenics US, LLC

2) DATE FORM PREPARED: 18 June 2019

3) SOURCE ID NO. (IF KNOWN): 043110AAC

GENERAL INFORMATION

4) NAME OF EMISSION UNIT:
(14) Sterilization Chamber Vacuum Pump and Backvents

5) NAME OF PROCESS:
Sterilization of medical products

6) DESCRIPTION OF PROCESS:
Chemical Sterilization

7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR ACTIVITY ACCOMPLISHED:
Sterilized Medical Supplies

8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT:
Sterilizer Chambers vacuum pumps and back vents

9) MANUFACTURER OF EMISSION UNIT (IF KNOWN):
-

10) MODEL NUMBER (IF KNOWN):
-

11) SERIAL NUMBER (IF KNOWN):
-

12) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)

a) CONSTRUCTION (MONTH/YEAR):
June 1984

b) OPERATION (MONTH/YEAR):
May 1985

c) LATEST MODIFICATION (MONTH/YEAR):
November 1990

13) DESCRIPTION OF MODIFICATION (IF APPLICABLE):
Each sterilization chamber includes a chamber vacuum pump and back vent. The chamber vacuum pump is connected to the existing scrubber #1. Back vents exhaust to scrubber #2. This application proposes to duct the exhaust from scrubber #1 to scrubber #2 and dry bed reactor and then to a new Dry Bed Polisher for additional control.

FOR APPLICANT'S USE

14) DOES THE EMISSION UNIT HAVE MORE THAN ONE MODE OF OPERATION? ☒ YES ☐ NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE PROCESS EMISSION UNIT FORM 220-CAAPP MUST BE COMPLETED FOR EACH MODE):

Propylene oxide can also be used for treatment of food products in certain chambers.

15) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS EMISSION UNIT, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):

The vacuum pumps currently are ducted to existing acid scrubber #1. This application proposes to duct scrubber #1 to the existing scrubber #2 with dry bed reactor and then to a new dry bed polisher.

16) WILL EMISSIONS DURING STARTUP EXCEED EITHER THE ALLOWABLE EMISSION RATE PURSUANT TO A SPECIFIC RULE, OR THE ALLOWABLE EMISSION LIMIT AS ESTABLISHED BY AN EXISTING OR PROPOSED PERMIT CONDITION? ☐ YES ☒ NO

IF YES, COMPLETE AND ATTACH FORM 203-CAAPP, "REQUEST TO OPERATE WITH EXCESS EMISSIONS DURING STARTUP OF EQUIPMENT".

17) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., ONLY ONE UNIT IS OPERATED AT A TIME):

Usage limitations shall not exceed 2800 pounds per month for propylene oxide and 300,000 pounds per 12 month rolling average for ethylene oxide for all emission units in Willowbrook I.

OPERATING INFORMATION

18) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE FOLLOWING OPERATING INFORMATION, MATERIAL USAGE INFORMATION AND FUEL USAGE DATA WERE BASED AND LABEL AS EXHIBIT 220-1. REFER TO SPECIAL NOTES OF FORM 202-CAAPP.

19a) MAXIMUM OPERATING HOURS 8760 per year	HOURS/DAY: 24	DAYS/WEEK: 7	WEEKS/YEAR: 52	
b) TYPICAL OPERATING HOURS 8600 per year	HOURS/DAY: 24	DAYS/WEEK: 7	WEEKS/YEAR: 52	
20) ANNUAL THROUGHPUT	DEC-FEB(%): 25	MAR-MAY(%): 25	JUN-AUG(%): 25	SEP-NOV(%): 25

MATERIAL USAGE INFORMATION

	MAXIMUM RATES		TYPICAL RATES	
21a) RAW MATERIALS	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
Ethylene Oxide		150		
Propylene oxide		17		

21b) PRODUCTS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
N/A				

21c) BY-PRODUCT MATERIALS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
N/A				

FUEL USAGE DATA

22a) MAXIMUM FIRING RATE (MILLION BTU/HR):	b) TYPICAL FIRING RATE (MILLION BTU/HR):	c) DESIGN CAPACITY FIRING RATE (MILLION BTU/HR):
N/A	N/A	N/A

d) FUEL TYPE:

☐ NATURAL GAS ☐ FUEL OIL: GRADE NUMBER _____ ☐ COAL ☐ OTHER _____

IF MORE THAN ONE FUEL IS USED, ATTACH AN EXPLANATION AND LABEL AS EXHIBIT 220-2.

e) TYPICAL HEAT CONTENT OF FUEL (BTU/LB, BTU/GAL OR BTU/SCF):	f) TYPICAL SULFUR CONTENT (WT %., NA FOR NATURAL GAS):
g) TYPICAL ASH CONTENT (WT %., NA FOR NATURAL GAS):	h) ANNUAL FUEL USAGE (SPECIFY UNITS, E.G., SCF/YEAR, GAL/YEAR, TON/YEAR):

23) ARE COMBUSTION EMISSIONS DUCTED TO THE SAME STACK OR CONTROL AS PROCESS UNIT EMISSIONS? ☐ YES ☐ NO

IF NO, IDENTIFY THE EXHAUST POINT FOR COMBUSTION EMISSIONS:

APPLICABLE RULES

24) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.204(j)(4), 3.5 LBS/GAL):

REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
Ethylene Oxide	40CFR 63.362	99% reduction

25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
Ethylene Oxide	40 CFR 63.10	MACT recordkeeping and reporting

26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
Ethylene Oxide	40 CFR 63.10	MACT recordkeeping and reporting

27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
HAP controlled by scrubbers	40CFR 63.364	Weekly Scrubber liquor level
WB1 Scrubber 2 and dry beds	40CFR 63.364	Weekly EO concentration from dry beds

28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)
EO applies to WB1 Scrubber 1,2	40 CFR63.365	Testing of control equipment

29) DOES THE EMISSION UNIT QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE? ☐ YES ☒ NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 220-3, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

COMPLIANCE INFORMATION

30) IS THE EMISSION UNIT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

31) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Reviewed in 260-CAAPP form

32) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Records of Ethylene Oxide (EO) and Propylene Oxide (PO) usage. (monthly)
WB1 Scrubber 1 and 2 are required to monitor scrubber liquor level weekly, pH weekly.
EO concentration: CEMS unit to be installed in common stack

TESTING, MONITORING, RECORDKEEPING AND REPORTING

33a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Sterilant Usage	pounds	Operating data	monthly
Liquor level	inches	Operating data	weekly
EO conc	ppm	CEMS	continuous
pH	pH	pH meter	weekly

33b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Sterilant usage	Operating report	General Manager	EH&S
Liquor Level	PM records	General Manager	EH&S
EO conc	CEMs	General Manager	EH&S
pH	PM Records	General Manager	EH&S

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? ☒ YES ☐ NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND SUBMITTAL TO THE AGENCY UPON REQUEST? ☒ YES ☐ NO

IF NO, EXPLAIN:

34a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Monitor and record the level of the scrubber liquor in recirculation tank.
EO concentration: CEMS will be installed

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., VOM EMISSIONS TO ATMOSPHERE)?

Level of scrubber liquor.
EO concentration: CEMS to be installed

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., IN STACK MONITOR 3 FEET FROM EXIT):

CEMS location in the stack to be determined

34d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? ☒ YES ☐ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? ☒ YES ☐ NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED EMISSION UNIT IS IN OPERATION? ☒ YES ☐ NO

IF NO, EXPLAIN:

35) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 220-4:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
9/21/18	18	ECSi	Normal	> 99% efficiency

36) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Annual emissions report	Annual emissions report	annual
Excess emissions	Excess emissions	semi-annual

(37)EMISSION INFORMATION

REGULATED AIR POLLUTANT		☐ [1]ACTUAL EMISSION RATE ☐ [1]UNCONTROLLED EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			[2]PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[3]OTHER TERMS	[4]DM	[5]RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						( )				
	TYPICAL:						( )				
LEAD	MAXIMUM:						( )				
	TYPICAL:						( )				
NITROGEN OXIDES (NOx)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER (PART)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						( )				
	TYPICAL:						( )				
SULFUR DIOXIDE (SO2)	MAXIMUM:						( )				
	TYPICAL:						( )				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						( )				
	TYPICAL:						( )				
OTHER, SPECIFY: _____	MAXIMUM:						( )				
	TYPICAL:						( )				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	*5.00*	*21.9*	*0.3 GR/DSCF*		*1*	*6.0 (LBS/HR)*	*212.321*	*26.28*	*5.5 LBS/HR*	*22*
	TYPICAL:	*4.00*	*14.4*	*0.24 GR/DSCF*		*4*	*5.5 (LBS/HR)*	*212.321*	*19.80*		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-5.

[1]CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.
[2]PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
[5]RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

(38) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

☐ [1]ACTUAL EMISSION RATE
☐ [1]UNCONTROLLED EMISSION RATE

NAME OF HAP EMITTED	[2]CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[4]DM	ALLOWABLE BY RULE: [5]RATE OR STANDARD	ALLOWABLE BY RULE: APPLICABLE RULE
Ethylene Oxide	75-21-8	MAXIMUM:			ppmv	1	99% by control device	40 CFR 63 Subpart O
		TYPICAL:						
Propylene Oxide	75-56-9	MAXIMUM:					None	
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE:								
Benzene	*71432*	MAXIMUM:	*10.0*	*1.2*		*2*	*98% by wt control device leak-tight trucks*	*CFR 61 61 302(b),(d)*
		TYPICAL:	*8.0*	*0.8*		*2*		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-6.

[1]PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.
[2]CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
[5]RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

39) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT:		
40) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.		
41) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):		
42) DISCHARGE HEIGHT ABOVE GRADE (FT):		
43) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):		
44) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.		
45) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
46) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):
47) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):		

48) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

NAME	FLOW DIAGRAM DESIGNATION
a)	
b)	
c)	
d)	
e)	

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

49a) LATITUDE:	b) LONGITUDE:	
50) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE
Revision #: 0
Date: 6 / 18 / 2019
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Source Designation: Aeration

PROCESS EMISSION UNIT DATA AND INFORMATION

FOR AGENCY USE ONLY
ID NUMBER:
EMISSION POINT #:
DATE:

SOURCE INFORMATION

1) SOURCE NAME: Sterigenics US, LLC

2) DATE FORM PREPARED: 18 June 2019

3) SOURCE ID NO. (IF KNOWN): 043110AAC

GENERAL INFORMATION

4) NAME OF EMISSION UNIT: WB1 (3) Aeration Rooms

5) NAME OF PROCESS: Aeration Rooms

6) DESCRIPTION OF PROCESS: Chemical Sterilization

7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR ACTIVITY ACCOMPLISHED: Sterilized Medical Supplies

8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT: Aeration Rooms

9) MANUFACTURER OF EMISSION UNIT (IF KNOWN): -

10) MODEL NUMBER (IF KNOWN): -

11) SERIAL NUMBER (IF KNOWN): -

12) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)

a) CONSTRUCTION (MONTH/YEAR): June 1984

b) OPERATION (MONTH/YEAR): May 1985

c) LATEST MODIFICATION (MONTH/YEAR): March 1998

13) DESCRIPTION OF MODIFICATION (IF APPLICABLE):
The aeration rooms currently exhaust to Acid Scrubber #2 and AAT Dry Beds. All emissions will be reduced further by the installation of new Polisher-Dry Beds which will further treat emissions prior to going to atmosphere.

FOR APPLICANT'S USE

14) DOES THE EMISSION UNIT HAVE MORE THAN ONE MODE OF OPERATION? ☐ YES ☒ NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE PROCESS EMISSION UNIT FORM 220-CAAPP MUST BE COMPLETED FOR EACH MODE):

15) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS EMISSION UNIT, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):

WB1 Acid Scrubber (scrubber #2) with Dry Bed Reactor.

(Proposed) WB1 Polisher

16) WILL EMISSIONS DURING STARTUP EXCEED EITHER THE ALLOWABLE EMISSION RATE PURSUANT TO A SPECIFIC RULE, OR THE ALLOWABLE EMISSION LIMIT AS ESTABLISHED BY AN EXISTING OR PROPOSED PERMIT CONDITION? ☐ YES ☒ NO

IF YES, COMPLETE AND ATTACH FORM 203-CAAPP, "REQUEST TO OPERATE WITH EXCESS EMISSIONS DURING STARTUP OF EQUIPMENT".

17) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., ONLY ONE UNIT IS OPERATED AT A TIME):

See Form 220-CAAPP for Sterilization Chambers

OPERATING INFORMATION

18) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE FOLLOWING OPERATING INFORMATION, MATERIAL USAGE INFORMATION AND FUEL USAGE DATA WERE BASED AND LABEL AS EXHIBIT 220-1. REFER TO SPECIAL NOTES OF FORM 202-CAAPP.

19a) MAXIMUM OPERATING HOURS 8760 per year	HOURS/DAY: 24	DAYS/WEEK: 7	WEEKS/YEAR: 52	
b) TYPICAL OPERATING HOURS 8600 per year	HOURS/DAY: 24	DAYS/WEEK: 7	WEEKS/YEAR: 52	
20) ANNUAL THROUGHPUT	DEC-FEB(%): 25	MAR-MAY(%): 25	JUN-AUG(%): 25	SEP-NOV(%): 25

MATERIAL USAGE INFORMATION

21a) RAW MATERIALS	MAXIMUM RATES LBS/HR	MAXIMUM RATES TONS/YEAR	TYPICAL RATES LBS/HR	TYPICAL RATES TONS/YEAR
N/A-See Form 220-CAAPP				
for sterilization chambers				

21b) PRODUCTS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
N/A				

21c) BY-PRODUCT MATERIALS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
N/A				

FUEL USAGE DATA

22a) MAXIMUM FIRING RATE (MILLION BTU/HR):	b) TYPICAL FIRING RATE (MILLION BTU/HR):	c) DESIGN CAPACITY FIRING RATE (MILLION BTU/HR):
N/A	N/A	N/A

d) FUEL TYPE:

☐ NATURAL GAS ☐ FUEL OIL: GRADE NUMBER _____ ☐ COAL ☐ OTHER _____

IF MORE THAN ONE FUEL IS USED, ATTACH AN EXPLANATION AND LABEL AS EXHIBIT 220-2.

e) TYPICAL HEAT CONTENT OF FUEL (BTU/LB, BTU/GAL OR BTU/SCF):	f) TYPICAL SULFUR CONTENT (WT %., NA FOR NATURAL GAS):
g) TYPICAL ASH CONTENT (WT %., NA FOR NATURAL GAS):	h) ANNUAL FUEL USAGE (SPECIFY UNITS, E.G., SCF/YEAR, GAL/YEAR, TON/YEAR):

23) ARE COMBUSTION EMISSIONS DUCTED TO THE SAME STACK OR CONTROL AS PROCESS UNIT EMISSIONS? ☐ YES ☐ NO

IF NO, IDENTIFY THE EXHAUST POINT FOR COMBUSTION EMISSIONS:

APPLICABLE RULES

24) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.204(j)(4), 3.5 LBS/GAL):

REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
Ethylene Oxide	40CFR 63.362	99% reduction

25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
Ethylene Oxide	40 CFR 63.10	MACT recordkeeping and reporting

26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
Ethylene Oxide	40 CFR 63.10	MACT recordkeeping and reporting

27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
Ethylene Oxide	40CFR 63.364	Weekly Scrubber liquor level
	40CFR 63.364	Weekly EO concentration from dry beds

28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)
Ethylene Oxide	40 CFR63.365	Testing of control equipment

29) DOES THE EMISSION UNIT QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE? ☐ YES ☒ NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 220-3, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

COMPLIANCE INFORMATION

30) IS THE EMISSION UNIT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

31) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

WB1 Scrubber #2 was tested for aeration emissions January 23, 2003

32) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

WB1 Scrubber 2 is required to monitor scrubber liquor level weekly, pH weekly.
EO concentration: CEMS to be installed in common stack

TESTING, MONITORING, RECORDKEEPING AND REPORTING

33a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
EO conc	ppm	CEMS	continuous
Liquor level	inches	Operating data	weekly

33b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
EO conc	CEMS	General Manager	EH&S
Liquor Level	PM records	General Manager	EH&S

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? ☒ YES ☐ NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND SUBMITTAL TO THE AGENCY UPON REQUEST? ☒ YES ☐ NO

IF NO, EXPLAIN:

34a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Monitor and record the level of the scrubber liquor in recirculation tank.
EO concentration: CEMS to be installed in common stack

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., VOM EMISSIONS TO ATMOSPHERE)?

Level of scrubber liquor.
EO concentration.

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., IN STACK MONITOR 3 FEET FROM EXIT):

CEMS to be installed

34d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? ☒ YES ☐ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? ☒ YES ☐ NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED EMISSION UNIT IS IN OPERATION? ☒ YES ☐ NO

IF NO, EXPLAIN:

35) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 220-4:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
1/21/03		Kremer Env.	Normal	> 99% efficiency

36) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Excess emissions	Excess emissions	semi-annual
Emissions	Annual Emissions Report	annual

(37)EMISSION INFORMATION

REGULATED AIR POLLUTANT		☐ [1]ACTUAL EMISSION RATE ☐ [1]UNCONTROLLED EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			[2]PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[3]OTHER TERMS	[4]DM	[5]RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						( )				
	TYPICAL:						( )				
LEAD	MAXIMUM:						( )				
	TYPICAL:						( )				
NITROGEN OXIDES (NOx)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER (PART)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						( )				
	TYPICAL:						( )				
SULFUR DIOXIDE (SO2)	MAXIMUM:						( )				
	TYPICAL:						( )				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						( )				
	TYPICAL:						( )				
OTHER, SPECIFY: _____	MAXIMUM:						( )				
	TYPICAL:						( )				
EXAMPLE: PARTICULATE MATTER	MAXIMUM	*5.00*	*21.9*	*0.3 GR/DSCF*		*1*	*6.0 (LBS/HR)*	*212.321*	*26.28*	*5.5 LBS/HR*	*22*
	TYPICAL	*4.00*	*14.4*	*0.24 GR/DSCF*		*4*	*5.5 (LBS/HR)*	*212.321*	*19.80*		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-5.

[1]CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.
[2]PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
[5]RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

(38) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

☐ [1]ACTUAL EMISSION RATE
☐ [1]UNCONTROLLED EMISSION RATE

NAME OF HAP EMITTED	[2]CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[4]DM	ALLOWABLE BY RULE: [5]RATE OR STANDARD	ALLOWABLE BY RULE: APPLICABLE RULE
Ethylene Oxide	75-21-8	MAXIMUM:			ppmv	1	99% by control device	40 CFR 63 Subpart O
		TYPICAL:						
Propylene Oxide	75-56-9	MAXIMUM:					N/A	
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE:		MAXIMUM	*10.0*	*1.2*		*2*	*98% by wt control device*	*CFR 61*
Benzene	*71432*	TYPICAL	*8.0*	*0.8*		*2*	*leak-tight trucks*	*61.302(b),(d)*

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-6.

[1]PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.
[2]CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
[5]RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

39) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT:

40) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

41) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

42) DISCHARGE HEIGHT ABOVE GRADE (FT):

43) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

44) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

45) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
46) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):

47) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

48) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

	NAME	FLOW DIAGRAM DESIGNATION
a)		
b)		
c)		
d)		
e)		

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

49a) LATITUDE:	b) LONGITUDE:	
50) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE
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Date: 6 / 18 / 2019
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Source Designation: Other Areas

PROCESS EMISSION UNIT DATA AND INFORMATION	***FOR AGENCY USE ONLY***
	ID NUMBER:
	EMISSION POINT #:
	DATE:

SOURCE INFORMATION	
1) SOURCE NAME: Sterigenics US, LLC	
2) DATE FORM PREPARED: 18 June 2019	3) SOURCE ID NO. (IF KNOWN): 043110AAC

GENERAL INFORMATION	
4) NAME OF EMISSION UNIT: WBI - Other Areas	
5) NAME OF PROCESS: Other Areas	
6) DESCRIPTION OF PROCESS: Chemical Sterilization	
7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR ACTIVITY ACCOMPLISHED: Sterilized Medical Supplies	
8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT: Other Areas	
9) MANUFACTURER OF EMISSION UNIT (IF KNOWN): -	
10) MODEL NUMBER (IF KNOWN): -	11) SERIAL NUMBER (IF KNOWN): -
12) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):
13) DESCRIPTION OF MODIFICATION (IF APPLICABLE): The PTE will treat air from identified areas with new PTE Dry Beds and will be exhausted to a single common stack (ST-1).	

FOR APPLICANT'S USE

14) DOES THE EMISSION UNIT HAVE MORE THAN ONE MODE OF OPERATION? ☐ YES ☒ NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE PROCESS EMISSION UNIT FORM 220-CAAPP MUST BE COMPLETED FOR EACH MODE):

15) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS EMISSION UNIT, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):

WB1 PTE Dry Beds

16) WILL EMISSIONS DURING STARTUP EXCEED EITHER THE ALLOWABLE EMISSION RATE PURSUANT TO A SPECIFIC RULE, OR THE ALLOWABLE EMISSION LIMIT AS ESTABLISHED BY AN EXISTING OR PROPOSED PERMIT CONDITION? ☐ YES ☒ NO

IF YES, COMPLETE AND ATTACH FORM 203-CAAPP, "REQUEST TO OPERATE WITH EXCESS EMISSIONS DURING STARTUP OF EQUIPMENT".

17) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., ONLY ONE UNIT IS OPERATED AT A TIME):

-

OPERATING INFORMATION

18) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE FOLLOWING OPERATING INFORMATION, MATERIAL USAGE INFORMATION AND FUEL USAGE DATA WERE BASED AND LABEL AS EXHIBIT 220-1. REFER TO SPECIAL NOTES OF FORM 202-CAAPP.

19a) MAXIMUM OPERATING HOURS 8760 per year	HOURS/DAY: 24	DAYS/WEEK: 7	WEEKS/YEAR: 52	
b) TYPICAL OPERATING HOURS 8600 per year	HOURS/DAY: 24	DAYS/WEEK: 7	WEEKS/YEAR: 52	
20) ANNUAL THROUGHPUT	DEC-FEB(%): 25	MAR-MAY(%): 25	JUN-AUG(%): 25	SEP-NOV(%): 25

MATERIAL USAGE INFORMATION

	MAXIMUM RATES		TYPICAL RATES	
21a) RAW MATERIALS	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
N/A-see Form 220-CAAPP				
for sterilization chambers				

21b) PRODUCTS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
N/A				

21c) BY-PRODUCT MATERIALS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
N/A				

FUEL USAGE DATA

22a) MAXIMUM FIRING RATE (MILLION BTU/HR):	b) TYPICAL FIRING RATE (MILLION BTU/HR):	c) DESIGN CAPACITY FIRING RATE (MILLION BTU/HR):
N/A	N/A	N/A

d) FUEL TYPE:

☐ NATURAL GAS ☐ FUEL OIL: GRADE NUMBER _____ ☐ COAL ☐ OTHER _____

IF MORE THAN ONE FUEL IS USED, ATTACH AN EXPLANATION AND LABEL AS EXHIBIT 220-2.

e) TYPICAL HEAT CONTENT OF FUEL (BTU/LB, BTU/GAL OR BTU/SCF):	f) TYPICAL SULFUR CONTENT (WT %., NA FOR NATURAL GAS):
g) TYPICAL ASH CONTENT (WT %., NA FOR NATURAL GAS):	h) ANNUAL FUEL USAGE (SPECIFY UNITS, E.G., SCF/YEAR, GAL/YEAR, TON/YEAR):

23) ARE COMBUSTION EMISSIONS DUCTED TO THE SAME STACK OR CONTROL AS PROCESS UNIT EMISSIONS? ☐ YES ☐ NO

IF NO, IDENTIFY THE EXHAUST POINT FOR COMBUSTION EMISSIONS:

APPLICABLE RULES

24) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.204(j)(4), 3.5 LBS/GAL):

REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
None	None	None

25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
None	None	None

26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
None	None	None

27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
None	None	None

28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)
None	None	None

29) DOES THE EMISSION UNIT QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE? ☐ YES ☒ NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 220-3, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

COMPLIANCE INFORMATION

30) IS THE EMISSION UNIT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

31) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Reviewed in 260-CAAPP form

32) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Reviewed in 260-CAAPP form

TESTING, MONITORING, RECORDKEEPING AND REPORTING

33a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
EO conc	ppb	CEMS	continuous
Pressure	inches water	Magnahelic gauge	continuous

33b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
EO conc	CEMS	General Manager	EH&S
Pressure	PM records	General Manager	EH&S

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? ☒ YES ☐ NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND SUBMITTAL TO THE AGENCY UPON REQUEST? ☒ YES ☐ NO

IF NO, EXPLAIN:

34a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

EO concentration: CEMS to be installed in common stack.
Building Pressure

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., VOM EMISSIONS TO ATMOSPHERE)?

EO concentration
Pressure

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., IN STACK MONITOR 3 FEET FROM EXIT):

EO Concentration: In stack
Pressure: TBD

34d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? ☒ YES ☐ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? ☒ YES ☐ NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED EMISSION UNIT IS IN OPERATION? ☒ YES ☐ NO

IF NO, EXPLAIN:

35) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 220-4:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS

36) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Excess emissions	Excess emissions	semi-annual
Annual emissions	Annual emissions report	Annual

(37)EMISSION INFORMATION

REGULATED AIR POLLUTANT		☐ [1]ACTUAL EMISSION RATE ☐ [1]UNCONTROLLED EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			[2]PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[3]OTHER TERMS	[4]DM	[5]RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						( )				
	TYPICAL:						( )				
LEAD	MAXIMUM:						( )				
	TYPICAL:						( )				
NITROGEN OXIDES (NOx)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER (PART)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						( )				
	TYPICAL:						( )				
SULFUR DIOXIDE (SO2)	MAXIMUM:						( )				
	TYPICAL:						( )				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						( )				
	TYPICAL:						( )				
OTHER, SPECIFY: _____	MAXIMUM:						( )				
	TYPICAL:						( )				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	*5.00*	*21.9*	*0.3 GR/DSCF*		*1*	*6.0 (LBS/HR)*	*212.321*	*26.28*	*5.5 LBS/HR*	*22*
	TYPICAL:	*4.00*	*14.4*	*0.24 GR/DSCF*		*4*	*5.5 (LBS/HR)*	*212.321*	*19.80*		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-5.

[1]CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.
[2]PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
[5]RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

(38) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

☐ [1]ACTUAL EMISSION RATE
☐ [1]UNCONTROLLED EMISSION RATE

NAME OF HAP EMITTED	[2]CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[4]DM	ALLOWABLE BY RULE: [5]RATE OR STANDARD	ALLOWABLE BY RULE: APPLICABLE RULE
Ethylene Oxide	75-21-8	MAXIMUM:			ppmv	1		
		TYPICAL:						
Propylene Oxide	75-56-9	MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE:		MAXIMUM:	*10.0*	*1.2*		*2*	*98% by wt control device*	*CFR 61*
Benzene	*71432*	TYPICAL:	*8.0*	*0.8*		*2*	*leak-tight trucks*	*61.302(b),(d)*

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-6.

[1]PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.
[2]CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
[5]RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

39) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT:

40) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

41) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

42) DISCHARGE HEIGHT ABOVE GRADE (FT):

43) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

44) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

45) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
46) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):

47) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

48) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

	NAME	FLOW DIAGRAM DESIGNATION
a)		
b)		
c)		
d)		
e)		

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

49a) LATITUDE:	b) LONGITUDE:	
50) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE
Revision #: 0
Date: 6 / 24 / 19
Page 46 of 70
Source Designation:
Polisher Dry Beds

AIR POLLUTION CONTROL EQUIPMENT DATA AND INFORMATION

FOR AGENCY USE ONLY
ID NUMBER:
CONTROL EQUIPMENT #:
DATE:

THIS FORM MUST BE COMPLETED FOR EACH AIR POLLUTION CONTROL EQUIPMENT. COMPLETE AND PROVIDE THIS FORM IN ADDITION TO THE APPLICABLE ADDENDUM FORM 260-A THROUGH 260-K. A SEPARATE FORM MUST BE COMPLETED FOR EACH MODE OF OPERATION OF AIR POLLUTION CONTROL EQUIPMENT FOR WHICH A PERMIT IS BEING SOUGHT.

SOURCE INFORMATION

1) SOURCE NAME: Sterigenics US LLC - Willowbrook Facility

2) DATE FORM PREPARED: 06/24/19

3) SOURCE ID NO. (IF KNOWN): 043110AAC

GENERAL INFORMATION

4) NAME OF AIR POLLUTION CONTROL EQUIPMENT AND/OR CONTROL SYSTEM:
WBI-Polisher Dry Beds

5) FLOW DIAGRAM DESIGNATION OF CONTROL EQUIPMENT AND/OR CONTROL SYSTEM:
Dry Beds - Polisher

6) MANUFACTURER OF CONTROL EQUIPMENT (IF KNOWN):
Advanced Air Technologies

7) MODEL NUMBER (IF KNOWN):
N/A

8) SERIAL NUMBER (IF KNOWN):
-

9) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EQUIPMENT (ACTUAL OR PLANNED)

a) CONSTRUCTION (MONTH/YEAR):

b) OPERATION (MONTH/YEAR):

c) LATEST MODIFICATION (MONTH/YEAR):

10) BRIEFLY DESCRIBE MODIFICATION (IF APPLICABLE):

Add additional unit with16 dry beds to the exhaust of the WB1 AAT Acid Scrubber #2 with dry beds to further polish the air emissions prior to exhausitng to atmosphere through a single common stack (ST-1).

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

FOR APPLICANT'S USE

11) LIST ALL EMISSION UNITS AND OTHER CONTROL EQUIPMENT DUCTING EMISSIONS TO THIS CONTROL EQUIPMENT:

NAME	DESIGNATION OR CODE NUMBER
WB 1 AAT Scrubber #2 with dry beds	WB1 AAT Scrubber #2 with dry beds

12) DOES THE CONTROL EQUIPMENT HAVE MORE THAN ONE MODE OF OPERATION? ☐ YES ☒ NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE AIR POLLUTION CONTROL EQUIPMENT FORM 260-CAAPP MUST BE COMPLETED FOR EACH MODE):

13) IDENTIFY ALL ATTACHMENTS TO THIS FORM RELATED TO THIS AIR POLLUTION CONTROL EQUIPMENT(E.G., TECHNICAL DRAWINGS):

See attachment for dry bed unit drawing.

OPERATING SCHEDULE

14) IDENTIFY ANY PERIOD WHEN THE CONTROL EQUIPMENT WILL NOT BE OPERATING DUE TO SCHEDULED MAINTENANCE AND/OR REPAIRS WHEN THE FEEDING EMISSION UNIT(S) TO THIS CONTROL EQUIPMENT IS/ARE IN OPERATION:

None

15a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEEDING EMISSION UNIT(S) WHEN THE CONTROL EQUIPMENT IS/ARE NOT USED:

None

b) IS THIS CONTROL EQUIPMENT IN OPERATION AT ALL OTHER TIMES THAT THE FEEDING EMISSION UNIT(S) IS/ARE IN OPERATION? ☒ YES ☐ NO

IF NO, EXPLAIN AND PROVIDE THE DURATION OF THE CONTROL EQUIPMENT DOWNTIME:

APPLICABLE RULES

16) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.207(b)(1), 81% OVERALL & 90% CONTROL DEVICE EFF.):

REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
None		

17) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
None		

18) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
None		

19) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
None		

20) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)
HAP	40 CFR63.365	Initial testing of control equipment

COMPLIANCE INFORMATION

21) IS THE CONTROL SYSTEM IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

22) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Stack testing to demonstrate an overall control effiicency of all EO emissions from the facility meets a 99.9% control efficiency. or 0.2 ppm. These limits are applicable to the common stack as a whole, not to the polisher dry beds specifically.

23) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Operational monitoring and periodic stack testing.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

24a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
EO Concentration	ppb	CEMS	Continuous

24b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
EO Conc.	CEMS	General Manager	EH&S Director

c) IS COMPLIANCE OF THE CONTROL EQUIPMENT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? ☒ YES ☐ NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? ☒ YES ☐ NO

IF NO, EXPLAIN:

25a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

A Continuous Emissions Monitoring System (CEMS) will be installed in the common stack.

b) WHAT OPERATING PARAMETER(S) IS(ARE) BEING MONITORED (E.G., COMBUSTION CHAMBER TEMPERATURE)?

EO concentration as measured by CEMS

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., EXIT OF COMBUSTION CHAMBER):

Common stack

25d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? ☒ YES ☐ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? ☒ YES ☐ NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE CONTROL EQUIPMENT IS IN OPERATION? ☒ YES ☐ NO

IF NO, EXPLAIN:

26) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-1:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
None				

27) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Annual emissions report	Annual Emissions Report	Annual
Excess Emissions	Semiannual Excess Emiss.	Semiannual

CAPTURE AND CONTROL

28) DESCRIBE THE CAPTURE SYSTEM USED TO CONTAIN, COLLECT AND TRANSPORT EMISSIONS TO THE CONTROL EQUIPMENT. INCLUDE ALL HOODS, DUCTS, FANS, ETC. ALSO INCLUDE THE METHOD OF CAPTURE USED AT EACH EMISSION POINT. (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-2):

Proposing to duct WB1 AAT Scrubber #2 with dry beds exhaust to new polisher dry beds.

29) ARE FEATURES OF THE CAPTURE SYSTEM ACCURATELY DEPICTED IN THE FLOW DIAGRAM CONTAINED IN THIS APPLICATION? ☒ YES ☐ NO

IF NO, A SKETCH SHOWING THE FEATURES OF THE CAPTURE SYSTEM SHOULD BE ATTACHED AND LABELED AS EXHIBIT 260-3:

30) PROVIDE THE ACTUAL (MINIMUM AND TYPICAL) CAPTURE SYSTEM EFFICIENCY, CONTROL EQUIPMENT DESTRUCTION/REMOVAL EFFICIENCY, AND THE OVERALL REDUCTION EFFICIENCY PROVIDED BY THE COMBINATION OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT FOR EACH REGULATED AIR POLLUTANT TO BE CONTROLLED. ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EFFICIENCIES WERE BASED AND LABEL AS EXHIBIT 260-4:

a) CONTROL PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%) (MIN)	CAPTURE SYSTEM EFFICIENCY (%) (TYP)	CONTROL EQUIPMENT EFFICIENCY (%) (MIN)	CONTROL EQUIPMENT EFFICIENCY (%) (TYP)	OVERALL REDUCTION EFFICIENCY (%) (MIN)	OVERALL REDUCTION EFFICIENCY (%) (TYP)
i	Ethylene Oxide	100	100	99.9	99.9	99.9	99.9
ii							
iii							

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

Overall control efficiency from all EO sources measured in the stack will be either 99.9% or concentration of less than or equal to 0.2 ppm so as to comply with Senate Bill 1852 (101st General Assembly)

b) METHOD USED TO DETERMINE EACH OF THE ABOVE EFFICIENCIES (E.G., STACK TEST, MATERIAL BALANCE, MANUFACTURER'S GUARANTEE, ETC.) AND THE DATE LAST TESTED, IF APPLICABLE:

	EFFICIENCY DETERMINATION METHOD	DATE LAST TESTED
CAPTURE:	Engineering Design	
CONTROL:	Stack Test	
OVERALL:	Stack Test	

c) REQUIRED PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)	CONTROL EQUIPMENT EFFICIENCY (%)	OVERALL REDUCTION EFFICIENCY (%)	APPLICABLE RULE
i	EO	100	99	99	
ii					
iii					

iv EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

Overall control efficiency from all EO sources measured in the stack will be either 99.9% or concentration of less than or equal to 0.2 ppm so as to comply with Senate Bill 1852 (101st General Assembly)

(31)EMISSION INFORMATION

REGULATED AIR POLLUTANT		[1]ACTUAL EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			[2]PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[3]OTHER TERMS	[4]DM	[5]RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						( )				
	TYPICAL:						( )				
LEAD	MAXIMUM:						( )				
	TYPICAL:						( )				
NITROGEN OXIDES (NOx)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER (PART)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						( )				
	TYPICAL:						( )				
SULFUR DIOXIDE (SO2)	MAXIMUM:						( )				
	TYPICAL:						( )				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						( )				
	TYPICAL:						( )				
OTHER, SPECIFY: HAP	MAXIMUM:	See	Ex. 220a				( )			See exhibit	220 - a
	TYPICAL:						( )				
EXAMPLE PARTICULATE MATTER	MAXIMUM	*5.00*	*21.9*	*0.3 GR/DSCF*		*1*	*6.0 (LBS/HR)*	*212.321*	*26.28*	*5.5 LBS/HR*	*22*
	TYPICAL	*4.00*	*14.4*	*0.24 GR/DSCF*		*4*	*5.5 (LBS/HR)*	*212.321*	*19.80*		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-5.

[1]PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
[2]PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
[5]RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

(32) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		[1]ACTUAL EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	[2]CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[4]DM	[5]RATE OR STANDARD	APPLICABLE RULE
Ethylene Oxide	75-21-8	MAXIMUM:	see	narrative				
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE:		MAXIMUM:	*10.0*	*1.2*		*2*	*98% by wt control device*	*CFR 61*
Benzene	*71432*	TYPICAL:	*8.0*	*0.8*		*2*	*leak-tight trucks*	*61.302(b),(d)*

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-6.

[1]PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
[2]CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
[5]RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

33) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

WB1 Single Combined stack (ST-1)

34) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

30

35) DISCHARGE HEIGHT ABOVE GRADE (FT):

87 feet (assuming local approvals)

36) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

-

37) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

2

38) EXIT GAS FLOW RATE 29.3 m/s	a) MAXIMUM (ACFM): 33,500	b) TYPICAL (ACFM): 33,500
39) EXIT GAS TEMPERATURE 87	a) MAXIMUM (°F): 87	b) TYPICAL (°F): 87

40) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

Vertical

41) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

	NAME	FLOW DIAGRAM DESIGNATION
a)	All units and controls covered by flow diagram	See flow diagram 199-2
b)		
c)		
d)		
e)		
f)		
g)		

42) WHAT PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS ARE BEING DUCTED TO THIS EXHAUST POINT (%)?

100

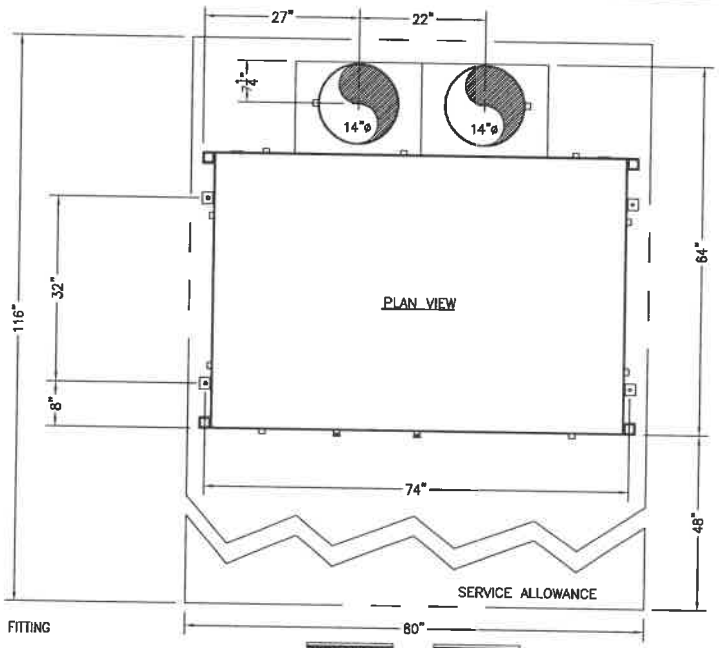
43) IF THE PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS BEING DUCTED TO THE EXHAUST POINT IS NOT 100%, THEN EXPLAIN WHERE THE REMAINING EMISSIONS ARE BEING EXHAUSTED TO:

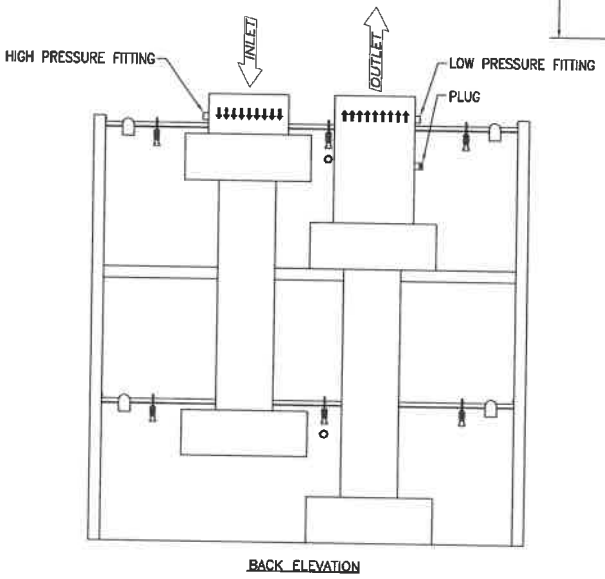
THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

44a) LATITUDE:	b) LONGITUDE:	
45) UTM ZONE: 16	b) UTM VERTICAL (KM): 4,622.252	c) UTM HORIZONTAL (KM): 421.920

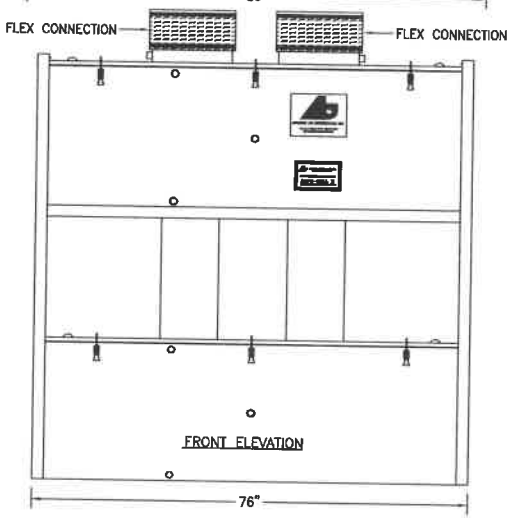
Customer approval: Brian Musch cn=Brian Musch, o=Sterigenics, ou, email=bmusch@sterigenics.com, c=US 2019.03.15 11:01:39 -05'00'

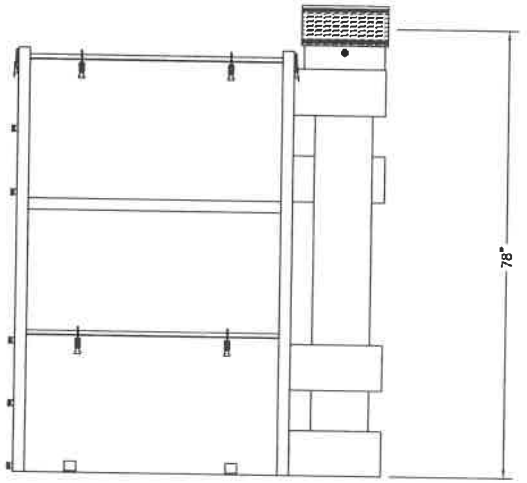
2000 CFM
WEIGHT: 2,200 LBS.





BACK ELEVATION





RIGHT SIDE

ADVANCED AIR TECHNOLOGIES, INC.
300 Earl Sleeseman Drive
Corunna, Michigan 48817
ph. 989.743.5544 fax 989.743.5624
AIR POLLUTION CONTROL SYSTEMS

FILE NAME: DR490 Customer Assembly		REV.	DATE:	PROJECT TITLE: DR-490	DRAWING TITLE: DR-490 A CUSTOMER ASSEMBLY
JOB NUMBER:	DRAWN BY: FF	REV.	DATE:		
DATE: 03/22/06	P.O. NUMBER:	REV.	DATE:		
SCALE: N/A	APPROVED BY:	REV.	DATE:		DWG. NUMBER: 01 REV.

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE
Revision #: 0
Date: 6 / 18 / 19
Page 57 of 70
Source Designation:
PTE Dry Beds

AIR POLLUTION CONTROL EQUIPMENT DATA AND INFORMATION

FOR AGENCY USE ONLY
ID NUMBER:
CONTROL EQUIPMENT #:
DATE:

THIS FORM MUST BE COMPLETED FOR EACH AIR POLLUTION CONTROL EQUIPMENT. COMPLETE AND PROVIDE THIS FORM IN ADDITION TO THE APPLICABLE ADDENDUM FORM 260-A THROUGH 260-K. A SEPARATE FORM MUST BE COMPLETED FOR EACH MODE OF OPERATION OF AIR POLLUTION CONTROL EQUIPMENT FOR WHICH A PERMIT IS BEING SOUGHT.

SOURCE INFORMATION

1) SOURCE NAME: Sterigenics US LLC - Willowbrook Facility

2) DATE FORM PREPARED: 06/18/19

3) SOURCE ID NO. (IF KNOWN): 043110AAC

GENERAL INFORMATION

4) NAME OF AIR POLLUTION CONTROL EQUIPMENT AND/OR CONTROL SYSTEM:
WB 1 - Permanent Total Enclosure Dry Beds

5) FLOW DIAGRAM DESIGNATION OF CONTROL EQUIPMENT AND/OR CONTROL SYSTEM:
WB 1 - Permanent Total Enclosure Dry Beds

6) MANUFACTURER OF CONTROL EQUIPMENT (IF KNOWN):
Advanced Air Technologies

7) MODEL NUMBER (IF KNOWN):
N/A

8) SERIAL NUMBER (IF KNOWN):
181540

9) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EQUIPMENT (ACTUAL OR PLANNED)

a) CONSTRUCTION (MONTH/YEAR):

b) OPERATION (MONTH/YEAR):

c) LATEST MODIFICATION (MONTH/YEAR):

10) BRIEFLY DESCRIBE MODIFICATION (IF APPLICABLE):
Air captured in the permanent total enclosure system (including from the chamber area, work aisle, processed product storage, and shipping area) will be directed to a new unit with 18 new dry bed cells.

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

FOR APPLICANT'S USE

11) LIST ALL EMISSION UNITS AND OTHER CONTROL EQUIPMENT DUCTING EMISSIONS TO THIS CONTROL EQUIPMENT:

NAME	DESIGNATION OR CODE NUMBER
Permanent Total Enclosure	Permanent Total Enclosure

12) DOES THE CONTROL EQUIPMENT HAVE MORE THAN ONE MODE OF OPERATION? ☐ YES ☒ NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE AIR POLLUTION CONTROL EQUIPMENT FORM 260-CAAPP MUST BE COMPLETED FOR EACH MODE):

13) IDENTIFY ALL ATTACHMENTS TO THIS FORM RELATED TO THIS AIR POLLUTION CONTROL EQUIPMENT(E.G., TECHNICAL DRAWINGS):

Drawings for dry beds attached.

OPERATING SCHEDULE

14) IDENTIFY ANY PERIOD WHEN THE CONTROL EQUIPMENT WILL NOT BE OPERATING DUE TO SCHEDULED MAINTENANCE AND/OR REPAIRS WHEN THE FEEDING EMISSION UNIT(S) TO THIS CONTROL EQUIPMENT IS/ARE IN OPERATION:

N/A

15a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEEDING EMISSION UNIT(S) WHEN THE CONTROL EQUIPMENT IS/ARE NOT USED:

N/A

b) IS THIS CONTROL EQUIPMENT IN OPERATION AT ALL OTHER TIMES THAT THE FEEDING EMISSION UNIT(S) IS/ARE IN OPERATION? ☒ YES ☐ NO

IF NO, EXPLAIN AND PROVIDE THE DURATION OF THE CONTROL EQUIPMENT DOWNTIME:

APPLICABLE RULES

16) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.207(b)(1), 81% OVERALL & 90% CONTROL DEVICE EFF.):

REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
None		

17) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
None		

18) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
None		

19) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
None		

20) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)
None		

COMPLIANCE INFORMATION

21) IS THE CONTROL SYSTEM IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

22) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Stack testing to demonstrate an overall control effiicency of all EO emissions from the facility meets a 99.9% or 0.2ppm control efficiency. These limits are applicable to the facility as a whole.

23) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Annual stack testing for facility EO control efficiency at the common stack. In addition a Continuous Emissions Monitoring System will be installed in the common stack.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

24a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Pressure	inches water	Magnahelic gauge	Continuous
EO Concentration	ppb	CEMS	Continuous

24b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Pressure	Electronic record	General Manager	EH&S Director
EO Concentratio	Electronic record	General Manager	EH&S Director

c) IS COMPLIANCE OF THE CONTROL EQUIPMENT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? ☒ YES ☐ NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? ☒ YES ☐ NO

IF NO, EXPLAIN:

25a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Pressure - monitored by magnahelic gauge to 0.007 inches water

EO Concentration to determine adsorbent replacement

b) WHAT OPERATING PARAMETER(S) IS(ARE) BEING MONITORED (E.G., COMBUSTION CHAMBER TEMPERATURE)?

Permanent Total Enclosure - Pressure

Permanent Total Enclosure Dry Bed - EO Concentration

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., EXIT OF COMBUSTION CHAMBER):

Pressure - locations to be defined

EO Concentration: CEMS in common stack

25d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? ☒ YES ☐ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? ☒ YES ☐ NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE CONTROL EQUIPMENT IS IN OPERATION? ☒ YES ☐ NO

IF NO, EXPLAIN:

26) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-1:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS

27) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
TBD		

CAPTURE AND CONTROL

28) DESCRIBE THE CAPTURE SYSTEM USED TO CONTAIN, COLLECT AND TRANSPORT EMISSIONS TO THE CONTROL EQUIPMENT. INCLUDE ALL HOODS, DUCTS, FANS, ETC. ALSO INCLUDE THE METHOD OF CAPTURE USED AT EACH EMISSION POINT. (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-2):

Air will be captured in affected areas and routed to Permanent Total Enclosure Dry Beds and treated prior to being exhausted to atmosphere via a single common stack (ST-1).

29) ARE FEATURES OF THE CAPTURE SYSTEM ACCURATELY DEPICTED IN THE FLOW DIAGRAM CONTAINED IN THIS APPLICATION? ☒ YES ☐ NO

IF NO, A SKETCH SHOWING THE FEATURES OF THE CAPTURE SYSTEM SHOULD BE ATTACHED AND LABELED AS EXHIBIT 260-3:

30) PROVIDE THE ACTUAL (MINIMUM AND TYPICAL) CAPTURE SYSTEM EFFICIENCY, CONTROL EQUIPMENT DESTRUCTION/REMOVAL EFFICIENCY, AND THE OVERALL REDUCTION EFFICIENCY PROVIDED BY THE COMBINATION OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT FOR EACH REGULATED AIR POLLUTANT TO BE CONTROLLED. ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EFFICIENCIES WERE BASED AND LABEL AS EXHIBIT 260-4:

a) CONTROL PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)		CONTROL EQUIPMENT EFFICIENCY (%)		OVERALL REDUCTION EFFICIENCY (%)	
		(MIN)	(TYP)	(MIN)	(TYP)	(MIN)	(TYP)
i	HAP	100	100	99.9	99.9	99.9	99.9
ii							
iii							

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

Overall control efficiency from all EO sources measured in the stack will be either 99.9% or concentration of less than or equal to 0.2ppm so as to comply with Senate bill 1852 (101st General Assembly)

b) METHOD USED TO DETERMINE EACH OF THE ABOVE EFFICIENCIES (E.G., STACK TEST, MATERIAL BALANCE, MANUFACTURER'S GUARANTEE, ETC.) AND THE DATE LAST TESTED, IF APPLICABLE:

	EFFICIENCY DETERMINATION METHOD	DATE LAST TESTED
CAPTURE:	Engineering design	
CONTROL:	Stack testing	
OVERALL:	Stack testing, flow measurement	

c) REQUIRED PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)	CONTROL EQUIPMENT EFFICIENCY (%)	OVERALL REDUCTION EFFICIENCY (%)	APPLICABLE RULE
i	HAP	100	99.9	99.9	N/A
ii					
iii					

iv EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

Overall control efficiency from all EO sources measured in the stack will be either 99.9% or concentration of less than or equal to 0.2ppm so as to comply with Senate bill 1852 (101st General Assembly)

(31) EMISSION INFORMATION

REGULATED AIR POLLUTANT		[1] ACTUAL EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			[2] PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3] OTHER TERMS	[3] OTHER TERMS	[4] DM	[5] RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						( )				
	TYPICAL:						( )				
LEAD	MAXIMUM:						( )				
	TYPICAL:						( )				
NITROGEN OXIDES (NOx)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER (PART)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						( )				
	TYPICAL:						( )				
SULFUR DIOXIDE (SO2)	MAXIMUM:						( )				
	TYPICAL:						( )				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						( )				
	TYPICAL:						( )				
OTHER, SPECIFY: _____	MAXIMUM:						( )			See exhibit	220 - a
	TYPICAL:						( )				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	*5.00*	*21.9*	*0.3 GR/DSCF*		*1*	*6.0 (LBS/HR)*	*212.321*	*26.28*	*5.5 LBS/HR*	*22*
	TYPICAL:	*4.00*	*14.4*	*0.24 GR/DSCF*		*4*	*5.5 (LBS/HR)*	*212.321*	*19.80*		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-5.

[1] PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
[2] PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
[3] PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
[4] DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
[5] RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

(32) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		[1]ACTUAL EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	[2]CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[4]DM	[5]RATE OR STANDARD	APPLICABLE RULE
Ethylene Oxide	75-21-8	MAXIMUM:	see	narrative				
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE:		MAXIMUM:	*10.0*	*1.2*		*2*	*98% by wt control device*	*CFR 61*
Benzene	*71432*	TYPICAL:	*8.0*	*0.8*		*2*	*leak-tight trucks*	*61.302(b),(d)*

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-6.

[1]PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
[2]CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
[5]RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

33) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

See 260-CAAPP-WB1 Polisher

34) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

35) DISCHARGE HEIGHT ABOVE GRADE (FT):

36) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

37) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

38) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
39) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):

40) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

41) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

	NAME	FLOW DIAGRAM DESIGNATION
a)		
b)		
c)		
d)		
e)		
f)		
g)		

42) WHAT PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS ARE BEING DUCTED TO THIS EXHAUST POINT (%)?

43) IF THE PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS BEING DUCTED TO THE EXHAUST POINT IS NOT 100%, THEN EXPLAIN WHERE THE REMAINING EMISSIONS ARE BEING EXHAUSTED TO:

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

44a) LATITUDE:	b) LONGITUDE:	
45) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):

SUMMARY OF AIR DISPERSION MODELING

Ramboll performed air dispersion modeling to evaluate potential impacts due to ethylene oxide emissions from the operations at Sterigenics' Willowbrook 1 (WB1) facility under the proposed improvement project. In this analysis, ethylene oxide air concentrations were estimated using air dispersion. Dispersion modeling inputs and methodology are discussed in detail below.

Modeled Ethylene Oxide Emissions

As discussed in the project descriptions, Sterigenics plans to install a series of air pollution control devices and a permanent total enclosure to further control ethylene oxide emissions. Ethylene oxide emissions were modeled at 85 pounds per year consistent with Sterigenics commitment for future emissions.

Air Dispersion Modeling Inputs

Ramboll used the latest version of the American Meteorological Society/USEPA Regulatory Model Improvement Committee Model (AERMOD, Version 18081) to evaluate the air dispersion of emissions from the Proposed Project site to estimate the off-site ethylene oxide concentrations. AERMOD is USEPA's recommended dispersion model.

AERMOD incorporates multiple variables in its algorithms including:

- Meteorological data representative of surface and upper air conditions;
- Local terrain data to account for elevation changes;
- Physical specification of emission sources including information such as:
  - Location;
  - Release height; and
  - Source parameters.

Dispersion model averaging times are specified based on the target health endpoint to be assessed. In this analysis, concentrations averaged over a five-year period were modeled at the nearby receptors. The model was performed using EPA's regulatory default option in AERMOD, which established the settings for variables such as building downwash, urban modeling dispersion option, and off-site receptor grid spacing. The urban option was used as the facility is located in the Chicago Metropolitan Area and is surrounded by populated areas.

STACK LOCATION and CONFIGURATION

Based on the design of the proposed control system, all the emissions would be released via a new stack 87 feet tall. All of the emissions will be discharged to atmosphere via this new stack, which was modeled as a point source. Source parameters for the proposed stack are provided in **Table 1** based on the engineering design of the proposed improvement project. In addition, building (tiers) are modeled such that the building downwash effects would be appropriately represented. The Building Profile Input Program (BPIP, Version 04274) was used to model building downwash effects on the dispersion of pollutants from point sources. The proposed stack location and modeled buildings are shown in **Figure 1**. The BPIP input and output files are included in **Appendix A**.

Table 1. Modeled Stack Parameters

UTMx (m)	UTMy (m)	Stack Height (ft)	Exhaust Temperature (°F)	Exhaust Exit Velocity (ft/s)	Stack Diameter (ft)
421,920	4,622,252	87	87	96.1	2.8

Figure 1. The Proposed Stack Location

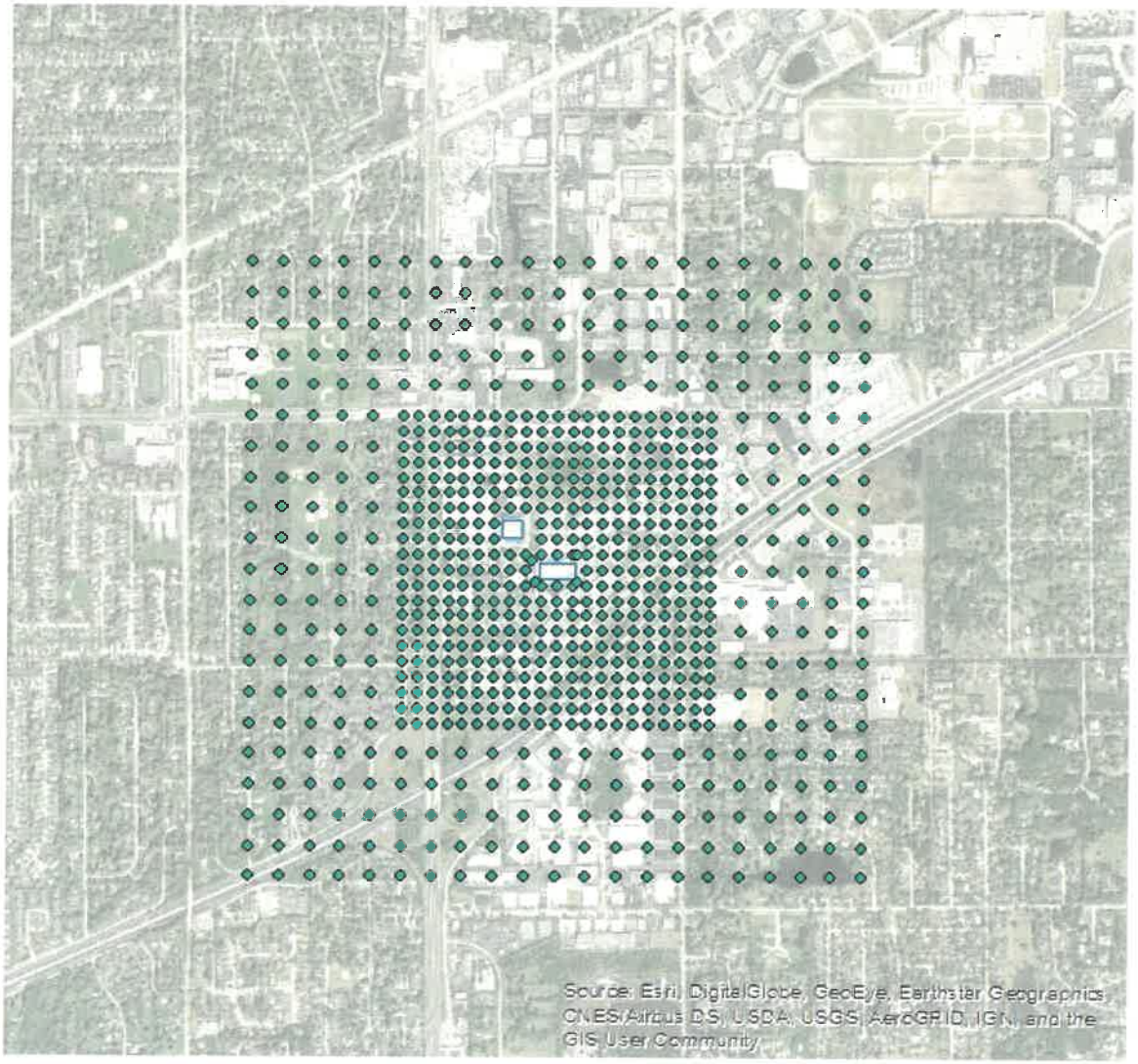
TERRAIN

Data specifying terrain elevations of sources and receptors are imported into the model using AERMOD's terrain pre-processor, AERMAP. Elevations based on the National Elevation Datasets (NEDs) were obtained from the United States Geologic Survey (USGS). Terrain heights for the receptor grid were processed by US EPA, while the terrain height for the new stack was calculated using AERMAP version 18081.

RECEPTORS

A Cartesian grid representing off-site receptor points around the primary Project area, developed by the US EPA, was included in the dispersion modeling. A network of receptors was placed with sufficient resolution to identify the maximum impacted receptor. The receptor grid consists of two-tiered receptor grids. The first tier is a 1000-meter by 1000-meter grid with a grid spacing of 50 meters. Tier 2 is a 2000-meter by 2000-meter grid with a grid spacing of 100 meters. A total of 877 receptors were modeled. **Figure 2** presents the modeled receptor locations.

Figure 2. Modeled Receptor Location



Meteorological Data

Meteorological data is required as part of the dispersion modeling to characterize the transport and dispersion of pollutants in the atmosphere. At the direction of the IL EPA, dispersion modeling was performed using a 5-year data set (2014 – 2018) from Argonne National Laboratory, which is located approximately 5 miles southwest of the facility. Upper air data, which is only collected at certain weather stations, was obtained from Davenport Municipal Airport (WBAN 94-982). The meteorological data was developed by the US EPA and provided by IL EPA. It is representative of meteorological conditions experienced at the facility.

Modeling Results

As presented in **Table 2**, the air dispersion modeling analysis generated maximum five-year average ethylene oxide concentrations due to the anticipated operations for the proposed improvement project. The maximum predicted impact that occurred over all at modeled receptors occurs at a location approximately 300 meters to the northeast of the stack. AERMOD input files and output files are included in **Appendix B**.

Table 2. Maximum Modeled Five-Year Average Ethylene Oxide Concentration Based on the Proposed Improvement Project

	UTM X (m)	UTM Y (m)	Max. Five-Year Avg. Modeled Concentration ($\mu g/m^3$)
Locations of Maximum Concentration	422017.1	4622523.1	0.00100
	421967.1	4622473.1	