State of Illinois

STATEMENT OF BASIS
FOR DRAFT CAAPP PERMIT

Source Name:	Nicor Gas – Ancona Station #70
Source I.D. Number:	105822AAD
Permit Number:	95120024
Date Prepared:	September 10, 2026

Permitting Authority:
Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217-785-1705

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1 – Legal Overview of the Permit and Permit Conditions

1.1 Legal Framework of the CAAPP

The Illinois EPA's state operating permit program for major sources established to meet the requirements of 40 CFR Part 70 is found at Section 39.5 of the Illinois Environmental Protection Act (Act) [415 ILCS 5/39.5]. The program is called the Clean Air Act Permitting Program (CAAPP). The CAAPP was given final full approval by USEPA on December 4, 2001 (see 66 FR 62946).

1.2 Legal Framework of This Document

This document is a requirement of Section 39.5(8)(b) of the Act, which states:

> "The Agency shall prepare a ..... statement that sets forth the legal and factual basis for the Draft CAAPP permit conditions, including references to the applicable statutory or regulatory provisions."

This Statement of Basis is not enforceable and only sets forth the legal and factual basis for the Draft CAAPP Permit Conditions. The Statement of Basis does not shield the source from enforcement actions or its responsibility to comply with existing or future applicable regulations. Nor does the Statement of Basis constitute a defense to a violation of the federal Clean Air Act (CAA) nor the Act, including implementing regulations.

1.3 Standards for Issuance of the CAAPP Permit

The Illinois EPA shall issue a CAAPP Permit if the following standards for issuance have been met, pursuant to Section 39.5(10)(a)(i) through (iv) of the Act:

- The applicant has submitted a complete and certified application for a permit consistent with Section 39.5(5) of the Act and applicable regulations.
- The applicant has submitted with its complete application an approvable compliance plan ... consistent with Section 39.5(5) of the Act and applicable regulations.
- The applicant has timely paid the fees required pursuant to Section 39.5(18) of the Act and applicable regulations.
- The applicant has provided any additional information as requested by the Illinois EPA.

It is the Illinois EPA's preliminary determination that the standards for issuance above have been met. Therefore, the Illinois EPA has initiated the necessary procedural requirements to issue a Final CAAPP Permit. The Illinois EPA has posted the Draft CAAPP Permit and this Statement of Basis on the Illinois EPA's website:

https://epa.illinois.gov/public-notices/boa-notices.html

1.4 Legal Framework for Conditions in the CAAPP Permit

Most of the conditions contained within the Draft CAAPP Permit are derived from environmental requirements found in state and/or federal regulations. In some instances, the CAAPP provides the legal basis for the inclusion of requirements in a CAAPP permit, such as periodic monitoring, reporting, recordkeeping, and the carry-over of construction permits. In other instances, the legal basis for inclusion of requirements in a CAAPP permit may not be the CAAPP, but rather other things, such as state or federal consent orders.

2 – Factual Overview for the Permit and Permit Conditions

2.1 Source Description

Source	Nicor Gas – Ancona Station #70
Source ID	105822AAD
Address	2 Miles East of Route 179 and 1 ½ Miles South of Route 17 Ancona, IL 61364
Township	Reading
County	Livingston
SIC Code	4924 Natural Gas Distribution

The source is a natural gas distribution company. In specific, it runs engines that compress the natural gas that it receives, removes the water via TEG Dehydration units, and has storage units for various organic chemicals required on site.

The source is not located in a potential area of Environmental Justice concern.

Emission Unit(s)	Description
Natural Gas Fired Engines	These are the onsite natural gas compressors for compression of natural gas.
TEG Dehydration Units	These are the stripping units. used to remove water from the natural gas via TEG and then clean the TEG via a reboiler.
Storage Tanks	Used to hold TEG, methanol, and gasoline.
Pipeline Heaters and Boilers	Used to heat pipeline containing natural gas.
Natural Gas Fired Turbines	Natural gas fired turbines subject to 40 CFR 60 Subpart KKKK. The turbines drive the compressors used to transport the natural gas.
Emergency Flare	Emergency Flare for Units 33 and 34 to flare excess natural gas from the existing storage reservoirs

2.2 Single Source Status

Nicor Gas – Ancona Station #70 does not have any associated stationary sources that would be considered a single stationary source based on information contained within the certified application.

Under Section 39.5 of the Act, separate stationary sources can be considered a single stationary source for purposes of Title V of the CAA if they:

- belong to the same industrial grouping or operate as a support facility,
- are located on contiguous or adjacent properties, and
- are under common control.

2.3 Ambient Air Quality Status for Surrounding Area

The source is located in an area with the following classifications regarding the National Ambient Air Quality Standards (NAAQS).

Criteria Pollutant	Attainment Status
Carbon Monoxide (CO)	Unclassifiable/Attainment
Lead (Pb)	Unclassifiable/Attainment
Nitrogen Dioxide (NO_2)	Unclassifiable/Attainment
Ozone (O_3)	Unclassifiable/Attainment
Particulate Matter with Mass Median Diameter at or below 2.5 microns ($PM_{2.5}$)	Not Yet Designated
Particulate Matter with Mass Median Diameter at or below 10 microns (PM_{10})	Unclassifiable
Sulfur Dioxide (SO_2)	Unclassifiable/Attainment

2.4 Reason(s) Why a CAAPP Source

The source requires a CAAPP permit for the following reason(s), per Section 39.5(2) of the Act:

Reason	Determination
PTE Exceeds 100 tpy of PM	No - Natural Minor
PTE Exceeds 100 tpy of SO_2	No - Natural Minor
PTE Exceeds 100 tpy of VOM	No - Natural Minor
PTE Exceeds 100 tpy of CO	Yes
PTE Exceeds 100 tpy of NO_X	Yes
PTE Exceeds 10 tpy of Individual HAP	No - Synthetic Minor
PTE Exceeds 25 tpy of Total HAPs	No - Synthetic Minor
Required in NSPS/NESHAP	No
Section 129 of the Clean Air Act Source	No
Treated as a "Major Source" under the New Source Review Program	No
Subject to Acid Deposition Control, Title IV of the Clean Air Act	No

2.5 Applicable Federal and State Regulations

Federal Regulations

Part	Subpart	Title
40 CFR Part 60	Subpart A	General Provisions
40 CFR Part 60	Subpart KKKK	Standards of Performance for Stationary Combustion Turbines
40 CFR Part 61	Subpart M	Standard of Asbestos
40 CFR Part 63	Subpart A	General Provisions
40 CFR Part 63	Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR Part 63	Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities
40 CFR Part 64	N/A	Compliance Assurance Monitoring
40 CFR Part 82	Subpart F	Ozone Depleting Substances

State Regulations

Part	Title
35 IAC Part 201	Permits and General Provisions
35 IAC Part 212	Visible And Particulate Matter Emissions
35 IAC Part 214	Sulfur Limitations
35 IAC Part 215	Organic Material Emissions Standards And Limitations
35 IAC Part 244	Episodes
35 IAC Part 254	Annual Emissions Report

2.6 Permitting History

List of CAAPP Permit Actions

Since issuance of the previous Renewal CAAPP permit, the source has been issued the following modifications and/or amendments:

Issued Date	Permit Action
06/21/2024	Administrative Amendment

List of Construction Permits

Construction permits derive from the New Source Review (NSR) permit programs required by Title I of the CAA. The Draft CAAPP Permit identifies Title I conditions with a [T1] "tag" following the condition.

Since issuance of the previous Renewal CAAPP permit, the source has been issued the following construction permits:

Permit Number	Date Issued	Status	Description
23090011	12/11/2023	Incorporated into the Draft CAAPP Permit	Emergency flare used in the event of maintenance or shutdown of the existing electric compressors 33 and 34 to flare excess natural gas from the existing storage reservoirs.

List of Obsolete or Extraneous Title I Conditions

Since issuance of the previous Renewal, the following conditions from construction permits have been designated obsolete and/or extraneous:

Permit Number	Condition	Description
15050007	1.7-2(c)	Obsolete – Visible emissions are not normally present, so the reporting requirement was only for the initial observation
18050032	1.6-2(c)	Obsolete – Visible emissions are not normally present, so the reporting requirement was only for the initial observation

2.7 Testing

Since issuance of the previous Renewal, the source performed the following testing:

Emission Unit	Date	Metric/Pollutant
Unit 41	09/15/2020	NOx, SO_2
Unit 41, 51 and 52	09/22/2021	NOx, SO_2
Unit 41	09/22/2022	NOx, SO_2
Unit 41, 51 and 52	09/21/2023	NOx, SO_2
Unit 41, 51 and 52	09/27/2024	NOx, SO_2
Unit 41, 51 and 52	10/21/2025	NOx, SO_2

2.8 Field Inspections

The source was most recently inspected on February 28, 2024.

2.9 Annual Emissions

The following table lists annual emissions (in tons) of regulated air pollutants for the source, as reported in the Annual Emission Reports (AER) submitted to the Illinois EPA:

Pollutant	2025	2024	2023	2022	2021
CO	32.70	34.48	32.04	27.30	32.13
NO_X	24.44	27.54	24.37	20.61	26.98
PM	2.39	2.75	2.62	1.91	2.20
SO_2	0.67	0.64	0.41	0.52	0.58
VOM	14.58	14.87	15.43	13.02	14.73
Formaldehyde (HAP)	0.55	0.87	2.50	1.53	1.86
Toluene (HAP)	1.79	1.68	1.93	1.66	1.78
Total HAP	4.14	4.33	6.38	4.69	5.28

3 – Changes from the Previously Issued CAAPP Permit

3.1 Permit Condition Changes

Decommissioned/Replaced Emission Unit

Decommissioned Heating Boiler HB1 (Natural gas fired, 3.48 MMBtu/hr) in Section 4.4 of the draft CAAPP permit.

Construction Permits

Incorporated Construction Permit #23090011 into Section 4.6 of the draft CAAPP permit. The construction permit authorizes installation of a new emergency flare which would be used in the event of maintenance or shutdown of the existing electric compressors 33 and 34. The flare would be used to flare excess natural gas from the existing storage reservoirs.

Federal Rules

Updated the requirements of 40 CFR Part 60 Subpart KKKK in Section 4.5 of the draft CAAPP permit. The updates are mostly regarding the new language of testing frequency and references of test methods.

Updated the requirements of 40 CFR Part 63 Subpart ZZZZ in Section 6.1 of the draft CAAPP permit. The updates moved the insignificant engines from Section 6.2 to Section 6.1.

Updated the requirements of 40 CFR Part 63 Subpart CCCCCC for the gasoline storage tank in Section 7.3 of the draft CAAPP permit. The updates list the new applicability of the General Provisions to Subpart CCCCCC.

State Rule

Changed the monitoring requirements to demonstrate compliance with the state opacity standard, 35 IAC 212.123(a), in Sections 4.1, 4.2, 4.4, and 4.5 of the draft CAAPP permit. The old permit did not define the averaging time over which the standard applies, so the primary change defines compliance based on the average opacity measured in three Method 9 observations (18 minutes total). To accommodate this change, the draft CAAPP permit also requires 18-minute Method 22 observations for visible emissions rather than leaving the observation time up to the discretion of the observer as was done in the prior CAAPP permit.

4 – Monitoring

CAAPP permits must contain applicable monitoring and related testing, reporting, and recordkeeping requirements. Broadly speaking, these types of conditions are meant to ensure that sources are able to demonstrate compliance with the applicable requirements. Two areas related to monitoring that are narrower in application include periodic monitoring and compliance assurance monitoring (CAM).

As addressed in 40 CFR 70.6(a)(3)(i)(B) and Section 39.5(7)(d)(ii) of the Act, periodic monitoring is a monitoring requirement(s) (which may include just recordkeeping) sufficient to yield reliable data for the relevant time period added when an applicable requirement does not require periodic testing or monitoring.

4.1 Periodic Monitoring for Source-Wide Requirements

Requirement	Periodic Monitoring Added?	Rationale
Fugitive Particulate Matter: 35 IAC 212.301, 35 IAC 212.314	Yes	Given the Source's low PM emission data, the high frequency daily monitoring upon IEPA request is adequate for demonstrating compliance.
Construction Permit #03080054 and Section 39.5(7)(a) of the Act HAP Requirements	Yes	Records of monthly and annual individual and total HAP emissions and supporting calculations, are adequate for demonstrating compliance with the HAP emission limits.

4.2 Periodic Monitoring for Significant Emission Units

a. Natural Gas Fired Engines

Requirement	Periodic Monitoring Added?	Rationale
40 CFR 63 Subpart ZZZZ Maintenance and Remote Status Requirements	No	Subpart ZZZZ establishes recurring engine maintenance, annual evaluation of remote stationary RICE status where applicable, oil analysis provisions if used, and associated recordkeeping.
40 CFR 63.6625(h), 63.6605(b), and 63.6640(a) Startup and Work Practice Requirements	Yes	Startup time records and explanations for extended startups, together with quarterly inspections of the engines and associated auxiliary equipment and the related maintenance and repair records, supplement the federal requirements and are adequate for demonstrating compliance.
35 IAC 212.123(a)	Yes	Annual Method 22 observations, with follow-up Method 22 and Method 9 observations when visible emissions are observed, together with records of those observations, are adequate for demonstrating compliance. The engines only fire pipeline quality natural gas, so emissions of PM (the primary cause of opacity) are generally minimal.
35 IAC 214.301	Yes	Records of the maximum SO_2 emission with supporting calculations, together with the pipeline quality natural gas

Requirement	Periodic Monitoring Added?	Rationale
		only fuel restriction and fuel use records, are adequate for demonstrating compliance. Sulfur compounds are removed from natural gas at processing plants, so SO_2 emissions from pipeline quality natural gas are expected to be very low.
Section 39.5(7)(a) of the Act and Construction Permit #93030133 NOx Emission Limits	Yes	Emissions testing of engines EG3 and CC23 every 61 months, together with monthly NOx emission calculations and running 12-month annual records, is adequate for demonstrating compliance with the annual NOx emission limits.
Construction Permit #03080054 HAP Emission Limits	Yes	Periodic formaldehyde testing, with CO allowed as a surrogate for the two stroke lean burn engine, together with monthly and annual individual and total HAP emission records and supporting calculations, is adequate for demonstrating compliance with the HAP emission limits.
Section 39.5(7)(a) of the Act and Construction Permit #03080054 Operational and Production Requirements	Yes	Monthly and annual fuel use records, engine operating hour records, emission records, and records of the type of fuel fired are adequate for demonstrating compliance with the fuel use limits and the requirement that pipeline quality natural gas be the only fuel fired in the engines.

b. <u>TEG Dehydration Units</u>

Requirement	Periodic Monitoring Added?	Rationale
35 IAC 212.123(a)	Yes	Annual Method 22 observations, with follow-up Method 22 and Method 9 observations when visible emissions are observed, together with records of those observations, are adequate for demonstrating compliance with the opacity standard for the reboilers.
Construction Permit #18060018 and 40 CFR 63.11(b)(4) FS9 and FS10 Opacity Requirements	Yes	Annual two-hour Method 22 observations of flares FS9 and FS10, together with records of the observations, provide an appropriate periodic frequency for demonstrating compliance with the Title I visible emission requirement.
35 IAC 214.301	Yes	Records of the maximum SO_2 emission with supporting calculations, together with the pipeline quality natural gas only fuel requirement, are adequate for demonstrating compliance. Sulfur compounds are removed from natural gas at processing plants, so SO_2 emissions are expected to be very low.
35 IAC 215.302(a)(1)	No	Adequate monitoring is addressed in the Compliance Assurance Monitoring (CAM) Plan in Condition 7.4 of the CAAPP permit.
Section 39.5(7)(a) of	Yes	Monthly GRI-GLYCalc calculations using inputs

Requirement	Periodic Monitoring Added?	Rationale
the Act VOM Annual Emission Limit		representative of actual operating conditions, together with monthly VOM emission records and running 12-month totals, are adequate for demonstrating compliance with the 39.0 ton/year VOM limit.
Construction Permits #16080009 and #18060018 Flare Operational and VOM Recordkeeping Requirements	No	The construction permit requirements carried over had adequate monitoring. They include continuous pilot flame monitoring for Flare #3A, prescribed flame presence and flare operating criteria for FS9 and FS10, records of flare control problems and corrective actions, and records of VOM emission factors and monthly and annual emissions.
Section 39.5(7)(a) of the Act Operational and Production Requirements	Yes	Records demonstrating that the fuel is pipeline quality natural gas, together with records of natural gas usage for the flares, are adequate for demonstrating compliance with the fuel requirement.
Construction Permits #13070017 and #16080009 Work Practice Requirements	Yes	Quarterly inspections of the TEG dehydration units, flares, and associated auxiliary equipment, together with inspection, maintenance, and repair records, are adequate for demonstrating compliance with good air pollution control practice for minimizing emissions.

c. <u>Storage Tanks</u>

Requirement	Periodic Monitoring Added?	Rationale
35 IAC 215.122(b); 35 IAC 215.583(a)(1)	Yes	Annual inspections for the presence of permanent submerged loading pipes, together with records of submerged loading pipes or submerged fill and related maintenance records, are adequate for demonstrating compliance.
Section 39.5(7)(a) of the Act Gasoline Throughput Limits	Yes	Monthly and annual gasoline throughput records, with annual compliance determined from a running total of 12 consecutive months of data, are adequate for demonstrating compliance with the monthly and annual throughput limits.
40 CFR 63.11116(a); Section 39.5(7)(a) of the Act Work Practice Requirements	Yes	Written operating procedures for implementing the gasoline handling requirements, together with annual inspections of the storage tanks and associated equipment and the related inspection, maintenance, repair, and material throughput records, are adequate for demonstrating compliance with the work practice requirements.

d. Pipeline Heaters

Requirement	Periodic Monitoring Added?	Rationale
35 IAC 212.123	Yes	Annual Method 22 observations, with follow-up Method 22 and Method 9 observations when visible emissions are observed, together with records of those observations, are adequate for demonstrating compliance. The heaters only fire pipeline quality natural gas, so emissions of PM (the primary cause of opacity) are generally minimal.
35 IAC 214.301	Yes	Records of the maximum SO_2 emission with supporting calculations, together with records of natural gas fuel usage and fuel type, are adequate for demonstrating compliance. Sulfur compounds are removed from natural gas at processing plants, so SO_2 emissions are expected to be very low.
Section 39.5(7)(a) of the Act Operational and Production Requirements	Yes	Records of fuel usage and the type of fuel used are adequate for demonstrating compliance with the requirement that pipeline quality natural gas be the only fuel fired in the pipeline heaters.
Section 39.5(7)(a) of the Act Work Practice Requirements	Yes	Quarterly inspections of the pipeline heaters and associated auxiliary equipment, together with inspection, maintenance, and repair records, are adequate for demonstrating compliance with safety and good air pollution control practice for minimizing emissions.

e. Natural Gas Fired Turbines

Requirement	Periodic Monitoring Added?	Rationale
35 IAC 212.123(a)	Yes	Annual Method 22 observations, with follow-up Method 22 and Method 9 observations when visible emissions are observed, together with records of those observations, are adequate for demonstrating compliance. The turbines fire natural gas, so emissions of PM (the primary cause of opacity) are generally minimal.
Construction Permits #15050007 and #18050032 PM, SO_2, VOM, CO, and NOx Emission Limits	Yes	Running 12-month emission determinations, hourly emission rate documentation, and monthly and annual emission records are adequate for demonstrating compliance with the Title I emission limits.
40 CFR 60 Subpart KKKK SO_2 and NOx Requirements	No	Federal regulations promulgated after November 15, 1990, contain adequate monitoring requirements. Subpart KKKK provides fuel sulfur monitoring and SO_2 performance test methods, together with periodic NOx performance testing and associated records.
35 IAC 214.301	Yes	Records of the maximum SO2 emission with supporting calculations, together with Subpart KKKK fuel sulfur monitoring and the natural gas only fuel restriction, are

Requirement	Periodic Monitoring Added?	Rationale
		adequate for demonstrating compliance with the 2,000 ppm SO_2 limit.
Construction Permits #15050007 and #18050032 Operational and Production Requirements	Yes	Manufacturer data, monthly and annual natural gas usage, total operating hours, low-load and very-cold-weather operating hours, and startup records are adequate for demonstrating compliance with the turbine capacity and operating hour requirements.
40 CFR 60.4333(a) Work Practice Requirements	Yes	Monthly inspections of each turbine and associated auxiliary equipment, together with inspection, maintenance, and repair records and the manufacturer operating and maintenance procedures, supplement the federal work practice requirement and are adequate for demonstrating compliance.

f. **Emergency Flare**

Requirement	Periodic Monitoring Added?	Rationale
35 IAC 212.123(a)	Yes	Annual Method 22 observations, with follow-up Method 22 and Method 9 observations when visible emissions are observed, together with records of those observations, are adequate for demonstrating compliance with the opacity standard.
Construction Permit #23090011 CO and NOx Emission Limits	No	The construction permit requirements carried over had adequate monitoring. Compliance with the annual limits is determined using running 12-month totals, supported by maximum hourly emission rate determinations and monthly and annual emission records for CO and NOx.
Construction Permit #23090011 Operational and Production Requirements	No	The construction permit requirements carried over had adequate monitoring. Instrumentation measures the amount of natural gas flared, and records are maintained for each day the flare is used and on an annual basis, which are adequate for demonstrating compliance with the flare use limits.
Construction Permit #23090011 Work Practice Requirements	No	The construction permit requirements carried over had adequate monitoring. Continuous pilot flame monitoring, operating records identifying periods when the flare was not operating properly, and inspection and maintenance logs are adequate for demonstrating compliance with the work practice requirement.

4.3 Compliance Assurance Monitoring (CAM)

The source operates the following emission unit(s) subject to CAM requirements. The CAM plan(s) can be found in Section 7.4 in the Draft CAAPP Permit.

Emission Unit	Pollutant	Control	Rationale
TEG Dehydration Units	VOM	Flares	Pilot flame detection device was chosen for continuous monitoring of the pilot flame using a computerized data acquisition, feedback, and control system to demonstrate the flare operates at all times the dehydration unit is in operation, with the ability to begin an automated restart of the flare pilot to minimize time the flare flame is down and to send alarmed signal of pilot flame outage to the control panel to be recorded or to an operator to manually follow up

5 – Other Discussions

5.1 Reporting

Regulatory Reports

Many state and federal environmental regulations establish reporting obligations. The CAAPP at Section 39.5(7)(b) of the Act makes clear that all reports required under applicable regulations shall be carried forward into the CAAPP Permit.

The Draft CAAPP Permit for this source includes all applicable regulatory reporting as promulgated under federal and state regulations under the CAA and the Act. The regulatory reports may also satisfy the prompt reporting obligations discussed below. These reports must be certified by a responsible official.

Deviation Reports (Prompt Reporting)

Section 39.5(7)(f)(ii) of the Act mandates that each CAAPP Permit require prompt reporting of deviations from permit requirements.

Failure to comply with a permit term, or any occurrence that results in an excursion from any emission limitation, operating condition, or work practice standard is a permit deviation subject to prompt reporting.

Neither the CAAPP nor the federal rules upon which the approved CAAPP program in Illinois is based define the term "prompt." The Illinois EPA has the discretion to define "prompt" in relation to the degree and type of deviation likely to occur at a particular source. The Illinois EPA defines prompt reporting on a permit-by-permit basis. In instances where the underlying applicable requirement contains "prompt" reporting, the Illinois EPA typically incorporates the pre-established timeframe into the CAAPP permit (e.g., a NESHAP or NSPS deviation report). Where the underlying applicable requirement does not explicitly set forth the timeframe for reporting deviations, the Illinois EPA generally uses a timeframe of 30 days to define prompt reporting of deviations.

In addition, pursuant to Section 39.5(7)(f)(i) of the Act, the Draft CAAPP Permit would also require the source to provide a summary of all deviations with the Semi-Annual Monitoring Report.

Semi-Annual Monitoring Reports

Section 39.5(7)(f)(i) of the Act mandates that each CAAPP Permit require the submittal of a report relative to monitoring obligations as set forth in the permit. Depending upon the monitoring obligation at issue, the semi-annual monitoring report may also constitute a deviation report as previously discussed. Semi-annual monitoring includes instrumental and non-instrumental emissions monitoring, emissions analyses, and emissions testing established by state or federal laws or regulations or as established in the CAAPP Permit. This monitoring also includes recordkeeping. Each deviation from each monitoring requirement must be identified in the relevant semi-annual report. The semi-annual reports shall be submitted regardless of any deviation events. Reporting periods for semi-annual monitoring reports are January 1 through June 30, and July 1 through December 31 of each calendar year. Such reporting requirement is found in Section 3.5(b) of the Draft CAAPP Permit.

Annual Compliance Certifications

Section 39.5(7)(p)(v) of the Act mandates that each CAAPP Permit require a source to submit a certification of its compliance status with each term and condition of its CAAPP Permit. The CAAPP requires that this report be submitted, regardless of compliance status, on an annual basis. The Draft CAAPP Permit requires this

annual certification be submitted by May 1 and cover the previous calendar year. The report shall be certified by a responsible official. Such reporting requirement is found in Section 2.5(a) of the Draft CAAPP Permit.