



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

INSTRUCTIONS FOR FORM 621-CAAPP (JUSTIFICATION FOR VOLUNTARY OVERCOMPLIANCE)

The information requested on Form 621-CAAPP must be submitted with the proposed emission baseline for a source when the source is requesting adjustment(s) to actual seasonal emissions based on voluntary overcompliance. The term “seasonal allotment period” means the period from May 1 to September 30 of each year. “Seasonal emissions” are the actual VOM emissions at a source that occur during a seasonal allotment period.

The boxes titled “FOR APPLICANT’S USE” on the form are provided solely for the applicant’s convenience. They may be left blank.

Please include identification of the emission unit on any attachments and reference the appropriate attachment in the space provided.

SECTION 1: SOURCE INFORMATION

The following information must be provided for the source for which the ERMS addendum is being submitted.

- 1) **SOURCE NAME:** The company name or specific plant name, if different from company name.
- 2) **DATE FORM PREPARED:** This should be the date the form is prepared or other date generally representing the time period when the form is prepared, to distinguish it chronologically from any other submittal of this form.
- 3) **ILLINOIS AIR POLLUTION SOURCE ID NO.:** This is the 9-digit code (6 numeric and 3 alphabetic) assigned to the source by the Agency’s Division of Air Pollution Control (DAPC). This number can be found at the top of the first page of any Illinois air pollution permit for the source. This number is unique to air pollution and should not be confused with water or land pollution ID numbers.
- 4) **NAME/ IDENTIFICATION OF EMISSION UNIT(S):** Provide the name of the emission unit or group of emission units that are being addressed by the form, with a brief description of the measures that were taken for which an adjustment for voluntary overcompliance is requested.

SECTION 2: JUSTIFICATION AND ADJUSTMENT FOR VOLUNTARY OVERCOMPLIANCE

5) **BEGINNING DATE OF VOLUNTARY OVERCOMPLIANCE:** Provide the initial date that the emission unit began voluntary over-compliant operation. For example, if a unit previously used compliant materials that resulted in VOM emissions of 3.5 lb/widget, but switched to an over-compliant material that resulted in VOM emissions of 2.7 lb/widget, then the date that the source began using the new over-compliant material must be provided. Likewise, if a new piece of control equipment was installed such that the emission unit began to over-comply with the applicable regulation, the date the emission unit began operation with the new control equipment must be provided. If more than one date applies, include a chronology of the voluntary overcompliance as an attachment.

In addition, provide the VOM emission rate from the emission unit on October 31, 1990 (or other later date representative of October 31, 1990) prior to the measures for which voluntary overcompliance is being claimed. The emission rate should be expressed in lb VOM per unit of production or activity. (This allows comparison of the emission rate in the selected seasons with the 1990 emission rate independent of change in production level.) Include any calculation used to determine an emission rate in terms of production or activity as an attachment. To obtain adjustment for voluntary over-compliance for an emission unit then the actual emission rate from the emission unit during one or both of the selected baseline seasons must be less than the 1990 emission rate.

6) **CONTROL EQUIPMENT:** If overcompliance is the result of new or improved control equipment, provide the capture and control efficiency prior to the improvements, i.e., the new or improved control system, which are the basis for claiming voluntary overcompliance.

Additionally, the capture and control efficiencies of the control equipment used to determine the baseline emissions must be provided. Note this information need only be provided when control equipment is the means by which overcompliance is achieved.

7) **GOVERNING RULES:** Identify all applicable rules or permit conditions that relate to VOM emissions to which the emission unit is subject. This includes permit conditions that have been accepted for the purposes of applicability of nonattainment New Source Review (NSR) such as limitations imposed on new units to avoid status as a major new source or modification and limitations on existing units imposed as a part of netting. If there is insufficient space to list this information here, include an attachment with this information.

Also indicate the most stringent permit condition or 1996 rule from which credit for voluntary overcompliance is being sought and the required emission rate, in the same terms as the emission rate in Item 5. For example, an emission unit may be subject to a requirement of at least 81% control pursuant to an applicable regulation. This same

emission unit may also have a limitation in a construction permit that requires the emission unit to be operated with control equipment that achieves at least 85% control. The actual control may achieve 90% control efficiency. The most stringent requirement in this case would be the requirement to meet 85% control pursuant to the construction permit.

8) EMISSION RECORDS AND DETERMINATION METHOD: Identify the emission determination methods used to calculate the actual seasonal VOM emissions and VOM emission rates for the two selected baseline seasons. The emission determination methods used should be consistent for all seasons.

As an attachment include relevant records or a summary of records to provide the data which was used with the selected emission determination method to determine VOM emissions. Also include a description of determination method(s) used to determine the 1990 and the allowable seasonal emissions based upon the underlying applicable rules if different than the method used to determine actual VOM emissions.

Also include any changes to emission determination method proposed for future operation under the ERMS. Such changes may be appropriate as additional data or records will be available in the future to determine VOM emissions, which were not available to determine VOM emissions historically. In addition, enhancement to emission determination methods may be appropriate to identify future changes in VOM emission rates that occur under the ERMS as a result of other improvements in VOM control measures that may occur or other possible changes in the operation of the emission unit.