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1.0 SOURCE IDENTIFICATION

1.1 Page Two, Inc.  
7000 S.W. Adams Street  
Bartonville, Illinois 61607  
309/697-4000

I.D. No.: 143812AAI  
Standard Industrial Classification: 3315, Steel Wire and  
Related Products

1.2 Owner/Parent Company

Page Two, Inc.  
7000 S.W. Adams Street  
Bartonville, Illinois 61607  
309/697-4000

1.3 Operator

Page Two, Inc.  
7000 S.W. Adams Street  
Bartonville, Illinois 61607  
309/697-4000

James J. Schmidt, President  
309/697-4000

1.4 General Source Description

This source specializes in the manufacture of aluminum coated steel wire. The continuous coating process draws steel wire through an annealing furnace, followed by a hydrochloric acid pickling tank, rinse tank, flux tank, drying oven, molten aluminum tank, and finally the wire is air dried and recoiled for shipping. There are also unpaved roads at this source.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	Actual cubic feet per minute
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
°F	degrees Fahrenheit
ft <sup>3</sup>	cubic foot
HAP	Hazardous Air Pollutant
HCl	Hydrochloric Acid
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kg	kilogram
kW	kilowatts
lb	pound
m	meter
Mg	Megagram
mmBtu	Million British thermal units
mmft <sup>3</sup>	Million cubic feet
N/A	Not Applicable
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
SIC	Standard Industrial Classification
SO <sub>2</sub>	Sulfur Dioxide
SW	Southwest
T	Tons
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
VOM	Volatile Organic Material

yr	year
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### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

HCl storage tank

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Coating operations (excluding powder, architectural and industrial maintenance coating) with aggregate VOM usage that never exceeds 15 lbs/day from all coating lines at the source, including VOM from coating, dilutents, and cleaning materials [35 IAC 201.210(a)(13)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

#### 3.2 Addition of Insignificant Activities

- 3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition

3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description
1	HCl Pickling Line comprised of HCl tank, rinse tank, flux tank, and flux dryer (rated capacity of 1.0 mmBtu/hr)
2	Aluminizing Coating Operation comprised of a molten aluminum tank and furnace (rated capacity of 3.38 mmBtu/hr)
3	Unpaved Roads (fugitive emissions)

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of a single HAP (i.e., HCl).

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an

approved technician certification program pursuant  
to 40 CFR 82.161.

5.3 Non-Applicability of Regulations of Concern

None on a source-wide basis. Refer to Section 7 for non-applicable rules of concern for specific emission units.

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	0.17
Sulfur Dioxide (SO <sub>2</sub> )	0.01
Particulate Matter (PM) (Note: Does not include 4.05 tons of HCl which is emitted as PM, i.e., 4.7% x 86.25 = 4.05 tons)	2.22
Nitrogen Oxides (NO <sub>x</sub> )	2.01
HAP (i.e., HCl), including 4.05 tons of HCl emitted as PM	86.25
TOTAL	90.66

5.5.2 Emissions of Hazardous Air Pollutants

N/A

5.5.3 Other Source-Wide Emission Limitations

- a. Total combined emissions of VOM from this source shall not exceed 25 tons/yr in the absence of air pollution control equipment, in accordance with 35 IAC 215.206(a).
- b. Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA.

## 5.6 General Recordkeeping Requirements

### 5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1 pursuant to Section 39.5(7)(b) of the Act:

- a. Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.
- b. A list giving the name and identification number of each coating (aluminum is considered a coating) and any other material used containing VOM.
- c. The weight percent VOM content of each coating and any other material used containing VOM.
- d. Usage rate of each coating and any other material used containing VOM (tons/yr).
- e. Total combined emissions of VOM from this source.

### 5.6.5 Records for Operating Scenarios

N/A

### 5.6.6 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available

for inspection and copying by the Illinois EPA or USEPA upon request.

- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

- a. Compliance with the source-wide emission limits specified in Condition 5.5.1 shall be based on the recordkeeping, reporting and compliance procedures of Sections 5 and 7 of this permit.
- b. Compliance with the source-wide VOM emissions limit of Condition 5.5.3 shall be determined based on the recordkeeping, reporting and compliance procedures of Section 7.2. Note that compliance is assured through the use of the aluminum coating which contains no VOM.

5.10 Special Permit Shield

N/A

6.0 [NOT APPLICABLE TO THIS PERMIT]

7.0 UNIT SPECIFIC CONDITIONS

7.1 HCl Pickling Line

7.1.1 Description

This is a continuous process which draws steel wire through the HCl pickling tank, rinse tank, flux tank and finally the drying oven before continuing on to the molten aluminum tank. HCl is emitted throughout each step.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description
1	HCl Pickling Line comprised of HCl tank, rinse tank, flux tank, and flux dryer (1.0 mmBtu/hr rated capacity)

7.1.3 Applicability Provisions and Applicable Regulations

The HCl Pickling Line is subject to the emission limits identified in Condition 5.2.2.

7.1.4 Non-Applicability of Regulations of Concern

This permit is issued based on the HCl Pickling Line not being subject to the process weight rule (i.e., 35 IAC 212.321 and 212.322). The process weight rule does not apply to pickling operations. [35 IAC 266.190(a)]

7.1.5 Control Requirements

None

7.1.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Section 5 that include this unit.

7.1.7 Operating Requirements

Natural gas shall be the only fuel utilized in the flux dryer.

7.1.8 Inspection Requirements

None

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items pursuant to Section 39.5(7)(b) of the Act:

- a. HCl usage (tons/yr); and
- b. Natural gas usage in the flux dryer (mmft<sup>3</sup>/yr).

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits of Section 5 shall be based on the recordkeeping and reporting requirements in this section and the emission factors and methods listed below:

- a. The emissions of HCl shall be calculated based on a material balance assuming that 75% of the total HCl used is emitted.
- b. Fuel combustion emissions from the flux dryer shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Natural Gas Emission Factor (lb/million ft<sup>3</sup>)</u>
NOx	100
PM	11.9
SO <sub>2</sub>	0.6
VOM	2.8

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (0.3 - < 10 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement F, October, 1996. VOM emission factor based on the TOC factor corrected for 52% methane contribution.

Emissions (lb) = (natural gas combusted, ft<sup>3</sup>) x  
(the appropriate emission factor)

- c. For informational purposes, the particulate matter emissions of HCl were determined based on a material balance assuming that 75% of the total HCl used is emitted and that 4.7% of these HCl emissions are particulate matter. In explanation, 4.7% of the HCl emitted shall be considered in a liquid material state of matter and therefore considered particulate matter (Note that "particulate matter" is defined in 35 IAC 211.4510). The value of 4.7% was measured in tests conducted on February 28 and March 1, 1990 and shall be used until a more recent test is using standard reference tests methods is performed and a value which is considered more accurate is obtained.

7.2 Aluminizing Coating Operation

7.2.1 Description

After leaving the HCl pickling line, the wire is passed through a tank of molten aluminum to apply a thin aluminum coating. The aluminum is melted in the tank by a furnace.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description
2	Aluminizing Coating Operation comprised of a molten aluminum tank and furnace (3.38 mmBtu/hr rated capacity)

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line" for the purpose of these unit specific conditions is the Aluminizing Coating Operation comprised of a molten aluminum tank and furnace.
- b. The affected coating line is subject to the following specific applicable regulations (refer to Condition 7.2.6 for specific requirements):
  - i. 35 IAC 215.206(a);
  - ii. 35 IAC 215.301; and
  - iii. 35 IAC 212.321(a).

7.2.4 Non-Applicability of Regulations of Concern

As a result of the source-wide emissions limit of 25 tons/yr of VOM contained in Condition 5.5.3 of this permit, the limitations of 35 IAC Subpart F do not apply, pursuant to 35 IAC 215.206(a).

7.2.5 Control Requirements

None

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source-wide emission limitations in Condition 5.5, the following apply:

- a. Refer to Condition 5.5.3 which establishes a source-wide VOM emission limit of 25 tons/yr [215.206(a)].
- b. The emissions of organic material into the atmosphere from the affected coating line shall not exceed 3.6 kg/hr (8 lbs/hr) except as follows; if no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material [215.301].
- c. The affected coating line is subject to 35 IAC 212.321(a), which requires that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321, and repeated below:

The emissions of particulate matter into the atmosphere in any one hour period from each affected coating line(s) shall not exceed the allowable emission rates specified in the following equation

$$E = A(P)^B$$

Where:

P = Process weight rate; and,  
 E = Allowable emission rate; and,

- 1. For process weight rates up to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

- 2. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour.

[35 IAC 212.321]

#### 7.2.7 Operating Requirements

Natural gas shall be the only fuel utilized in the furnace.

#### 7.2.8 Inspection Requirements

None

#### 7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items pursuant to Section 39.5(7)(b) of the Act:

- a. Natural gas usage in the furnace (million ft<sup>3</sup>/yr);
- b. A list giving the name and identification number of each coating (aluminum is considered a coating) and any other material used containing VOM;
- c. The weight percent VOM content of each coating and any other material used containing VOM; and
- d. Usage rate of each coating and any other material used containing VOM (tons/yr).

#### 7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such

deviations, and any corrective actions or preventive measures taken.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured by proper operation and the work-practices inherent in operation of the affected coating line.
- b. Compliance with the VOM emission limitations is assured through the use of the aluminum coating which contains no VOM.
- c. Fuel combustion emissions from the furnace shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Natural Gas Emission Factor (lb/million ft<sup>3</sup>)</u>
NOx	100
PM	11.9
SO <sub>2</sub>	0.6
VOM	2.8

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (0.3 - < 10 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement F, October, 1996. VOM emission factor based on the TOC factor corrected for 52% methane contribution.

Emissions (lb) = (natural gas combusted, ft<sup>3</sup>) x  
(the appropriate emission factor)

7.3 Unpaved Roads (Fugitive Emissions).

7.3.1 Description

Moving vehicles create particulate matter (road dust) emissions on approximately 400 feet of unpaved roadways.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description
3	Unpaved Roads (approximately 400 feet)(fugitive emissions)

7.3.3 Applicability Provisions and Applicable Regulations

Refer to the source-wide conditions in Section 5 which address opacity requirements.

7.3.4 Non-Applicability of Regulations of Concern

N/A

7.3.5 Control Requirements

None

7.3.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source-wide emission limitations in Condition 5.5 that are applicable to this unit.

7.3.7 Testing Requirements

- a. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act and 35 IAC 212.107, for both fugitive and non-fugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This test method shall be used to determine compliance with 35 IAC 212.123 [35 IAC 212.107].

- b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR part 60, Appendix A, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged. This test method shall be used to determine compliance with 35 IAC 212.301 [35 IAC 212.109].

7.3.8 Inspection Requirements

None

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1 and this section pursuant to Section 39.5(7)(b) of the Act:

For Unpaved Roads:

- a. E = particulate emission factor (lb/VMT)
- b. k = particle size multiplier (dimensionless)
- c. s = silt content of road surface material (%)
- d. S = mean vehicle speed (miles/hour)
- e. w = mean number of wheels
- f. p = number of days with at least 0.01 inch of precipitation per year
- g. VMT = vehicle miles traveled (VMT/yr)
- h. Particulate matter emissions from unpaved roads (ton/yr)

Records for fugitive road dust shall be calculated on an annual basis, except this calculation shall be

updated if substantial changes to the roads occur, i.e. additional roads added.

#### 7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

#### 7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.3.12 Compliance Procedures

Compliance with the emission limits of section 5 shall be based on the recordkeeping and reporting requirements in this section and the emission factors and methods listed below:

Emissions from unpaved roads shall be calculated based on the following emission factors and formulas:

$$E = k(5.9) [s/12] [S/30] [W/3]^{0.7} [w/4]^{0.5}$$

E is based upon the emission factor for PM from unpaved roads from Section 13.2.2 AP-42, Volume I, January, 1995.

PM emissions from unpaved roads = VMT x E

Conversion factors used: 2000 lb/ton

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements as of the date the proposed permit for this source was issued. This shield is granted based on the Illinois EPA's review of the permit application for this source and its determination that all applicable requirements are specifically identified in this permit. If the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after September 22, 1997 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification

may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

#### 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

#### 8.6 Reporting Requirements

##### 8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

#### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
  - i. Illinois EPA - Air Compliance Section  
  
Illinois Environmental Protection Agency (MC 40)  
Bureau of Air  
Compliance Section  
P.O. Box 19276  
Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Regional Field Office  
  
Illinois Environmental Protection Agency

Division of Air Pollution Control  
5415 North University  
Peoria, Illinois 61614

iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section  
P.O. Box 19506  
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

#### 9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

### 9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

### 9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

### 9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

## 9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;



- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

#### 9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

#### 9.5 Liability

##### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

##### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

##### 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

##### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

#### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

#### 9.6 Recordkeeping

##### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

##### 9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

##### 9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

#### 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

#### 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certifications shall include descriptions of means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

##### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this

permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
  - ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

#### 9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

#### 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

#### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

#### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records

directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

JRR:jar