

217/782-2113

"REVISED"  
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Wheatland Tube Company - Chicago Division  
Attn: James J. Pasko, Vice President, Operations  
4435 South Western Boulevard  
Chicago, Illinois 60609-3069

<u>Application No.:</u> 96030029	<u>I.D. No.:</u> 031600FDI
<u>Applicant's Designation:</u>	<u>Date Received:</u> February 18, 2004
<u>Operation of:</u> Hot Dip Galvanized Steel Tubing Manufacturing	
<u>Date Issued:</u> January 28, 2005	<u>Expiration Date<sup>2</sup>:</u> January 28, 2010
<u>Source Location:</u> 4435 South Western Boulevard, Chicago, Cook County, 60609	
<u>Responsible Official:</u> James J. Pasko, Vice President, Operations	

This permit is hereby granted to the above-designated Permittee to OPERATE a hot dip galvanized steel tubing manufacturing operation, pursuant to the above-referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: February 25, 2005  
Revision Date Issued: April 7, 2005  
Purpose of Revision: Administrative Amendment

This administrative amendment corrects typographical errors. Specifically, Condition 5.5.1 was corrected to increase the source-wide HAP limit (not including VOM or PM) to 1.50 tons. In addition, Condition 7.3.5(f) was revised to be consistent with Condition 5.2.5(c), which states that all coating equipment is classified as an "existing source" for the purposes of 40 CFR Part 63, Subpart M. Because the changes in the permit were only administrative, no formal public notice was issued.

This document only contains those portions of the entire CAAPP Permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supercedes those terms and conditions of the permit for which the conflict exists. The previous permit issued January 28, 2005 is incorporated herein by reference. Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

If you have any questions concerning this permit, please contact Jonathan Sperry at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:JS:psj

cc: Illinois EPA, FOS Region 1  
CES  
Lotus Notes

<sup>1</sup> This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - Federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit.

<sup>2</sup> Except as provided in condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Wheatland Tube Company - Chicago Division  
4435 South Western Boulevard and 2300 West 47th Street  
Chicago, Illinois 60609-3069  
773/254-0617

I.D. No.: 031600FDI  
Standard Industrial Classification: 3317, Steel Pipes and Tubes

1.2 Owner/Parent Company

John Maneely Company  
900 Haddon Avenue  
Collingswood, New Jersey 08708-2101

1.3 Operator

Wheatland Tube Company - Chicago Division  
4435 South Western Boulevard  
Chicago, Illinois 60609-3069

James J. Pasko  
773/254-0617

1.4 General Source Description

Wheatland Tube Company is located at 4435 South Western Boulevard in Chicago, Illinois. Wheatland Tube manufactures electrically welded carbon steel tubular products on four similar mills. The major difference between the four mills is the size of the tubing that can be produced. The products are in-line galvanized, coated on the outer diameter with either a UV-cured or a negligible-VOM coating, and on the inner diameter with a low-VOM solvent-based coating.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CE	control equipment
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
°F	degree Fahrenheit
ft	feet
ft <sup>3</sup>	cubic foot or cubic feet
gal	gallon
HAP	Hazardous Air Pollutant
HCl	Hydrochloric Acid
HEAF	high efficiency air filter
hr	hour
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IAC	Illinois Administrative Code
ID	interior diameter
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
kW	kilowatt
LAER	Lowest Achievable Emission Rate
lb	pound
m	meter
MACT	Maximum Achievable Control Technology
MEK	Methyl Ethyl Ketone
mmft <sup>3</sup>	million cubic feet
Mg	Megagram
mmBtu	million British thermal unit
mo	month
MSDS	Material Safety Data Sheet
MW	molecular weight
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
OD	outer diameter
O & M	operation and maintenance
PM	Particulate Matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds square inch atmospheric

RMP	Risk Management Plan
SO <sub>2</sub>	Sulfur Dioxide
SOCMI	Synthetic Organic Chemical Manufacturing Industry
T	ton
T1	Title I - Identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New - Identifies Title I conditions that are being established in this permit
T1R	Title I Revised - Identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
UV	ultraviolet
VOL	volatile organic liquid
VOM	Volatile Organic Material
wk	week
wt.	weight
wt. %	weight percentage
yr	year

### 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:

Chromate Conversion  
Fumeless Acid Cleaning  
6 Space Heaters  
4 Hydrochloric Acid Storage Tanks

- 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:

4 End Welders  
3 De-Burr Units  
Paint Dryer (2.7 mmBtu/hr)

- 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)].

Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a) (15)].

Storage tanks of any size containing exclusively soaps, detergents, surfactant, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions provided an organic solvent has not been mixed with such materials [35 IAC. 201.210 (a) (17)].

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

### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

### 3.3 Addition of Insignificant Activities

- 3.3.1 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).
- 3.3.2 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.
- 3.3.3 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	Date Constructed	Emission Control Equipment
01	In Line Paint Line 1	1/1990	Wet Scrubber 1
02	In Line Paint Line 2	3/1990	Wet Scrubbers 2 and 3
03	Off Line Paint Line 1	1970	Wet Scrubbers 4 and 5
04	Off Line Paint Line 2	8/1992	Wet Scrubbers 6 and 7
05	End Spray Packaging Line 1	1986	None
06	End Spray Packaging Line 2	1986	None
07	HCl Cleaning Mill 1	1970	Acid Fume Scrubber
08	HCl Cleaning Mill 2	1970	Acid Fume Scrubber
09	Hot Dip Galvanizing Mill 1	1970	Zinc Dust Collector
10	Hot Dip Galvanizing Mill 2	1970	Zinc Dust Collector
11	Thread Metallizer	2/1992	Wet Scrubber 8
19	Hot Dip Galvanizing Kettle 3	1/1998	Cartridge Dust Collectors
20	Paint Station	1/1998	6 Scrubbers
22	Hot Dip Galvanizing Kettle #4	10/2002	Cartridge Dust Collector
23	Paint Stations and Cutoff	10/2002	Scrubbers
24	Endspray Paint Station	10/2002	None

## 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 VOM and HAP emissions.

### 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. Emissions of smoke or other particulate matter from any emission unit shall not exceed 30% opacity, except that opacity of greater than 30% but less than 60% shall be allowed for periods aggregating 8 minutes in any 60 minute period provided that such more opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any such emission unit owned and operated by the Permittee and provided further that such more opaque emissions permitted from each such unit shall be limited to 3 times per 24 hour period pursuant to 35 IAC 212.123(a) and (b).
- 5.2.3 Ozone Depleting Substances

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.

#### 5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

#### 5.2.5 Future Emission Standards

- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.
- c. Except as specified in paragraph iv below, this stationary source is subject to 40 CFR Part 63, Subpart M, Surface Coating of Miscellaneous Metal Parts and Products. The Permittee shall comply with the applicable requirements of such regulation by the date(s) specified in such regulation, which is currently January 2, 2007, for the affected emission units, and shall certify compliance with the applicable requirements of such regulation as part of the annual compliance certification required by 40 CFR Part 70 or 71 beginning in the year that compliance is required under a final and effective rule.

- i. As of the date issued of this permit, the affected emission units include all coating operations, coating storage containers, coating mixing vessels, and coating conveying equipment in Mill #1, Mill #2, Mill #3, and Mill #4 (i.e., Emission Units 01-06, 20, and 23). Pursuant to 40 CFR 63.3882(c) and (e), all equipment at this source is classified as an existing source, even equipment constructed after August 13, 2002, since miscellaneous metal parts and products surface coating existed at this source before that date.
- ii. As of the dates required by the rule, the Permittee shall comply with the following:
  - A. During each 12-month compliance period, limit organic HAP emissions to the atmosphere from the affected coating operations to the following, except as specified in subsections B and C below. [40 CFR 63.3890(b)]:

<u>Coating Type</u>	<u>Organic HAP Limit</u>	
	<u>kg/L solids</u>	<u>lg/gal solids</u>
General Use	0.31	2.6
High Performance	3.3	27.5
Magnet Wire	0.12	1.0
Rubber-To-Metal	4.5	37.7
Extreme Performance Fluoropolymer	1.5	12.4

- B. If the affected surface coating operations meet the applicability criteria of more than one of the subcategory emission limits specified above, and if the general use or magnet wire surface coating operations subject to only one of the emission limits specified above account for 90 percent or more of the surface coating activity at this source, then compliance with that one emission limitation above for all surface coating operations constitutes compliance with the other applicable emission limits [40 CFR 63.3890(c)(1)].
- C. If the affected surface coating operations meet the applicability criteria of more than one of the subcategory emission limits specified above, then the Permittee may comply separately with each subcategory emission limit or comply with the 12-month weighted average emission limit specified in 40 CFR 63.3890(c)(2) [40 CFR 63.3890(c)].
- D. Demonstrate that the organic HAP content of each coating used in the coating operation is less than or equal to the emission limit above, and that each thinner and each cleaning material used contains no organic HAP. Meet all the requirements of 40 CFR 63.3940, 63.3941,

and 63.3942 to demonstrate compliance using this option [40 CFR 63.3891(a)]; or

- E. Demonstrate that, based on the coatings, thinners, and cleaning materials used in the coating operations, the organic HAP emission rate for the coating operations is less than or equal to the emission limit above, calculated as a rolling 12-month emission rate and determined on a monthly basis. Meet all the requirements of 40 CFR 63.3950, 63.3951, and 63.3952 to demonstrate compliance using this option [40 CFR 63.3891(b)].
- iii. The coating operations that emit HAPs are also subject to the general requirements 40 CFR 63 Subpart A (63.1 to 63.15), as specified in Table 2 to Subpart Mmmm.
- iv. This source may become an area source to avoid the requirements of 40 CFR Part 63, Subpart Mmmm, by requesting a federally enforceable limit to restrict actual and potential HAP emissions to below major source levels (10 tons per year of a single HAP and 25 tons per year of combined HAPs). Such a limit must be obtained prior to the first compliance date, which is January 2, 2007 as of the date issued of this permit.

#### 5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to the Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

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:

- a. On and after the compliance date in 40 CFR 63.3883, the Permittee shall follow the applicable Work Practices for the affected coating operations as specified in 40 CFR 63.3893.

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)	244.60
Sulfur Dioxide (SO <sub>2</sub> )	0.00
Particulate Matter (PM)	55.90
Nitrogen Oxides (NO <sub>x</sub> )	0.00
HAP, not included in VOM or PM (e.g., HCl)	1.50
Total	302.00

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the Clean Air Act being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a major source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

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. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

## 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:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

### 5.6.2 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items for the source to quantify annual VOM and HAP emissions, so as to demonstrate compliance with the annual emission limits in Condition 5.5:

- a. Aggregate monthly VOM emissions from emission units included in Section 7 of this permit; and
- b. Aggregate monthly HAP emissions from emission units included in Section 7 of this permit, calculated as a fraction of VOM emissions according to weight percent.

### 5.6.3 Records for Emission Units Subject to NESHAP

On and after the compliance date in 40 CFR 63.3883, the Permittee shall retain all applicable records for the affected coating operations as specified by 40 CFR 63.3930 and 63.3931.

### 5.6.4 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 deviations of the source with the requirements of this permit as follows, 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.:

Annual emissions from the source in excess of the limits specified in Condition 5.5.1, within 30 days of such an occurrence.

5.7.2 Annual Emission Report

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

5.7.3 Annual Reporting for HAP Emissions

a. The Permittee shall submit all applicable reports for the affected coating operations as specified in 40 CFR 63.3910 and 63.3920.

b. As required by 35 IAC Part 254, the Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from emission units that are subject to a National Emissions Standard for Hazardous Air Pollutants (NESHAP) or maximum achievable control technology (MACT). This information should be included in the annual emissions report required pursuant to Condition 9.7.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Allowable Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

5.9.2 Compliance Procedures for HAP Standards

To determine compliance with Condition 5.2.5(c) (see also 40 CFR 63.3890), the Permittee shall follow the applicable compliance procedures for the affected coating operations specified in 40 CFR 63.3900 and 63.3940 through 63.3952.

## 6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

### 6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they holds to other sources or participants (35 IAC 205.630).

### 6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

### 6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
  - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
  - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

### 6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

#### 6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
  - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

#### 6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.650(a), and shall be submitted in accordance with the following:
  - i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
  - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

#### 6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
  - i. Actual seasonal emissions of VOM from the source;
  - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
  - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
  - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
  - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
  - vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
  - i. The allotment of ATUs to this source is 405 ATUs per seasonal allotment period.
  - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 44.3088 tons.
    - A. This determination includes the use of 1994 and 1996 as baseline seasons. In addition, 1999 and 2000 were used as baseline seasons from Tube Mill #3.
    - B. This determination also includes adjustment to actual emissions to account for voluntary over-compliance at the source, e.g., usage of coatings with VOM content less than 3.5 lb/gal, pursuant to 35 IAC 205.320(d) as further addressed in Section 7 of this permit.
  - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
  - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
  - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

Emission Unit	Construction Permit No.	Date Issued
Mill #4	02050066	10/9/2002

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
  - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
  - ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
  - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

#### 6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

#### 6.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units, if satisfying subsection (a) (1), (a) (2), or (a) (3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a) (1), (a) (2), or (a) (3) [35 IAC 205.405(a)]:
  - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
  - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and
  - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

Tube Mill #3

- b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)].

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 In Line Paint Line 1 and 2, Off Line Paint Line 1 and 2, and End Packaging Line 1 and 2

7.1.1 Description

Wheatland Tube Company, Chicago Division manufactures steel tubing that is hot dip galvanized in-line for use in the construction industry as electrical conduit and for other applications.

The main raw material for the production of tubes is steel, which arrives in coils, and is cut to narrow strips according to the desired tube diameter. Then the strip is cleaned with alkaline cleaner to remove oil and formed into round tube, edges are welded, and the tube is cleaned with hydrochloric acid and then galvanized with melted zinc. Liquid Chromate is applied on top of the zinc coating to protect it from corrosion. Then the tube is cut to the desired length and is sent to further processing (packaging, etc.).

Tube in-line painting occurs right after welding but the vapor and particulate release takes place only after cut-off where the tube is cut into pieces. Some of the tubes are not painted in-line but are moved to off-line stations where their inside surface is painted. Some of the tubes are threaded at the ends and the thread is heated and then zinc powder is applied to protect the thread from corrosion. Coatings may be dried using a natural gas fired paint dryer, which is classified as an insignificant activity in Section 3 of this permit.

There are two mills with the in line painting and off line painting lines. Emission Units 01-06 are used for in line, off line, and end packaging painting. Emission units were constructed and operated in 1986.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	In Line Paint Line 1	Wet Scrubber 1
02	In Line Paint Line 2	Wet Scrubbers 2 and 3
03	Off Line Paint Line 1	Wet Scrubbers 4 and 5
04	Off Line Paint Line 2	Wet Scrubbers 6 and 7
05	End Spray Packaging Line 1	None
06	End Spray Packaging Line 2	None

7.1.3 Applicable Regulations

- a. An "affected paint line" for the purpose of these unit specific conditions includes each coating line for steel tubing products identified in Condition 7.1.2.
- b. Each affected paint line at the source is subject to 35 IAC 212.321(a), which requires that:
  - i. 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 (see Attachment 2) [35 IAC 212.321(a)].
- c. Each affected paint line at the source is subject to 35 IAC 218.204(j)(1): Miscellaneous Metal Parts and Product - Clear coating and 218.204(j)(2)(A): Miscellaneous Metal Parts and Product - Extreme performance air dried coating, which provides that:

- i. No owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products Coating. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>Description</u>	<u>kg/liter</u>	<u>lbs/gallon</u>
Clear Coating	0.52	4.3
Air Dried	0.42	3.5

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.
- b. Each affected paint line at the source is subject to the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart Mmmm. The Illinois EPA is administering NESHAP in Illinois on behalf of the USEPA under a delegation agreement. Standards and requirements for this NESHAP are in Section 5 (Overall Source Conditions).

7.1.4 Non-Applicable Regulations of Concern

- a. Each affected paint line is not subject to 35 IAC 218.301, use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material. This rule excludes coating lines which use coatings that comply with 35 IAC 218.204 from this requirement.
- b. This permit is issued based on the affected paint lines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each affected paint line falls in one or more of the following categories:
  - i. Does not use an add-on control device to achieve compliance with a VOM emission limitation or standard; or
  - ii. Is subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

7.1.5 Operational and Work Practices

- a. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source-wide limitations in Condition 5.5, the affected paint lines are subject to the following limits.

- a. Emissions and operation of the conduit coating process shall not exceed the following limits:

Coating Usage		VOM Emissions	
<u>(gal/mo)</u>	<u>(gal/yr)</u>	<u>(T/Mo)</u>	<u>(T/Hr)</u>
3,907	44,930	8.40	96.6

These limits are based on use of coatings with a VOM content that complies with 35 IAC 218.204(j)(2)(A) and maximum coating usage.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

The above limitations were established in Operating Permit 86090026 pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification of these emission units does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203.

#### 7.1.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a) and Section 39.5(7)(b) and (d)(ii) of the Act]

- a. On at least an annual basis, the VOM content of specific coatings and cleaning solvents used on each affected paint line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 281.105(a).
  - i. The VOM content of representative coatings "as applied" on the affected paint line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
  - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent.
- b. Upon request by the Illinois EPA, the Permittee shall conduct a stack test to verify the relationship between the control equipment (i.e., scrubber) operating parameters and control equipment performance.

#### 7.1.8 Monitoring Requirements

The Permittee shall operate in accordance with the following requirements, pursuant to Section 39.5(7)(b) and (d)(ii) of the Act:

- a. The Permittee shall monitor the following on a continuous regular basis in order to ensure proper operation of the control equipment:
  - i. The Permittee shall maintain pressure drop monitoring devices within a range in accordance with vendor's recommendation as follows:

<u>Control Device</u>	<u>Pressure Drop Range in Inches of Water</u>
Scrubbers 1-7	3-6 Inches as Per Vendor's Recommendation

#### 7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for each affected paint line to demonstrate compliance with Condition 5.5.1 and the Conditions of this section, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall collect and record the following items each day for each line:
  - i. A list giving the name and identification number of each coating as applied, dilution solvent, clean-up solvent, and any other material used which contains VOM.
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempt from the definition of VOM) as applied each day on each line.
- b. The Permittee shall collect and record the following items:
  - i. VOM content in weight percent for each material used containing VOM. The Permittee shall also record VOM content in volume percent if the second equation in Condition 7.1.12(a) is used.
  - ii. Density in pounds per gallon of each material used containing VOM.
  - iii. Actual usage of coatings, solvent and any other material used containing VOM in gal/month and gal/year.
  - iv. Emissions of VOM in tons/month and tons/year.
- c. The Permittee shall collect and record cleanup solvent usage in tons/month and tons/year. VOM emissions from cleanup solvents shall be calculated from the difference in cleanup solvents taken from inventory and reclaimed cleanup solvents sent to temporary storage for ultimate outside disposal.

- d. Records of the testing of VOM and HAP content (wt. %) of each coating and cleaning solvent as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:
  - i. Identification of material tested;
  - ii. Results of analysis;
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.
- e. The Permittee shall collect and record the following items each week for each control device:
  - i. Record indicating the proper maintenance of pressure drop monitoring device of scrubbers 1-7. Also, records which indicate that the pressure drop range mentioned in Condition 7.1.8 (a) has not been exceeded for scrubbers 1-7.
  - ii. Record indicating pressure drop monitoring data of scrubbers 1-7.
  - iii. Record and log of scrubbant changes and other O & M parameters of scrubbers 1-7.

#### 7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected paint line with the control and operating requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. The Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.1.3(c) within 30 days of such an occurrence [35 IAC 218.211(d)(3)].
- b. Any record showing a violation of the conditions of this permit, including the operating and emission limits in Conditions 7.1.5 and 7.1.6, shall be reported by sending a copy of such record to the Illinois EPA Compliance Unit within 30 days following the occurrence of the violation.

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected paint lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this permit and the affected paint lines remain in compliance with the requirements of this permit.

7.1.12 Compliance Procedures

- a. Compliance with the VOM content limitations in Condition 7.1.3(c) shall be determined from the recordkeeping requirements in Condition 7.1.9 and by either testing as required by Condition 7.1.7 or by use of the following formulae:

$$\begin{aligned} \text{Coating VOM Content} &= V \times D / [1 - W \times D], \text{ or} \\ \text{Coating VOM Content} &= V \times D / [1 - \sum v_i] \end{aligned}$$

Where:

V = Percent VOM in the coating (wt.%)

D = Overall coating density (lb/gal)

W =  $\sum (w_i/d_i)$

w<sub>i</sub> = Percent exempt compound i in the coating (wt.%)

d<sub>i</sub> = Density of exempt compound i (lb/gal)

v<sub>i</sub> = Percent exempt compound i in the coating (volume percent)

and the summation is applied over water and all exempt compounds in the coating.

- b. Compliance with the VOM emission limitations in Conditions 5.5.1 and 7.1.6 shall be determined from the recordkeeping and testing required by this section and the following equation:

$$\begin{aligned} \text{VOM Emissions (lb)} &= \text{Coating Usage (gal)} * \\ &\text{Coating Density (lb/gal)} * \text{VOM Content of} \\ &\text{Coating (wt.\%)} + \text{Solvent/Thinner Usage (gal)} * \\ &\text{VOM Content of Solvent/Thinner (wt.\%)} * \\ &\text{Solvent/Thinner Density (lb/gal)}. \end{aligned}$$

The Permittee may use the VOM content from MSDS if that specific coating material is applied as supplied.

- c. Recordkeeping, monitoring, and testing requirements of this section shall be used to determine compliance with the particulate matter emissions.

## 7.2 Acid Cleaning Mill 1 and 2, Hot Dip Galvanizing Mill 1 and 2, Thread Metallizer

### 7.2.1 Description

Wheatland Tube Company, Chicago Division manufactures steel tubing that is hot-dip galvanized in-line for use in the construction industry as electrical conduit and for other applications.

Following the inner diameter coating, the welded tube passes through a hydrochloric acid cleaning solution, followed by a flowing water rinse. This operation is used to clean the outside surface of the welded tube, particularly the weld seam, to remove any oxides that may have formed during the welding process. Mills #1 and #2 have collection hoods which convey fumes to a recirculating water scrubber control device prior to exhausting through a stack. The water is discharged to the wastewater treatment plant for neutralization.

After acid cleaning, the welded tube is preheated by electric induction to facilitate the bonding of the molten zinc with the steel substrate (i.e., galvanizing). Zinc ingots are melted in an electrically heated kettle and pumped up to the trough through which the tube passes after preheating. The molten zinc flows over the preheated tube, leaving a thin coating of zinc metal on the outer diameter for corrosion protection. As the tube exits, an air wiper controls the thickness of the coating by blowing off excess zinc. PM emissions are captured and drawn to a cartridge filter by a fan, then exhausted to a stack. After galvanizing, the tube passes through a flowing water quench bath that cools the zinc-coated tube, followed by a chromate solution bath for added corrosion protection prior to outer diameter coating.

Emission Units 07-11 are used for acid cleaning, hot dip galvanizing and thread metallizing. Emission unit 11 was constructed or modified after 1986. Emission units 07-10 were constructed and operated prior to 1972.

### 7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
07	HCl Cleaning Mill 1	Acid Fume Scrubber
08	HCl Cleaning Mill 2	Acid Fume Scrubber
09	Hot Dip Galvanizing Mill 1	Zinc Dust Collector
10	Hot Dip Galvanizing Mill 2	Zinc Dust Collector
11	Thread Metallizer	Wet Scrubber 8

### 7.2.3 Applicable Regulations

- a. An "affected emission unit" for the purpose of these unit specific conditions includes each mill or metallizer used for treating steel tubing products in Condition 7.2.2.
- b. Affected emission unit 11 is subject to 35 IAC 212.321(a), which requires that:
  - i. 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 (see Attachment 2) [35 IAC 212.321(a)].
- c. Affected emission units 07-10 are subject to 35 IAC 212.322(a), which requires that:
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing 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 prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see Attachment 2) [35 IAC 212.322(a)].

### 7.2.4 Non-Applicable Regulations of Regulations of Concern

- a. This permit is issued based on the affected emission units not being subject to 40 CFR Part 63, Subpart CCC (Steel Pickling), because the steel used at this source has already been pickled. The acid cleaning performed at this source is a removal of light rust or scale from finished steel products or activation of the metal surface prior to plating or coating, which is excluded from the definition of steel pickling [40 CFR 63.1156].

### 7.2.5 Operational and Work Practices

- a. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.

7.2.6 Emission Limitations

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

7.2.7 Testing Requirements

- a. Pursuant to 35 IAC 201.282, and upon request by the Illinois EPA, the Permittee shall conduct stack test to verify the relationship between the control equipment (i.e., scrubber, zinc dust collector) operating parameters and control equipment performance.

7.2.8 Monitoring Requirements

The Permittee shall operate in accordance with the following requirements, pursuant to Section 39.5(7)(b) and (d)(ii) of the Act:

- a. The Permittee shall monitor the following on a continuous regular basis in order to ensure proper operation of the control equipment:

- i. The Permittee shall maintain pressure drop monitoring devices with in a range in accordance with vendor's recommendation as follows:

<u>Control Device</u>	<u>Pressure Drop Range in Inches of Water</u>
Acid Fume Scrubber	3-6 inches as per vendor's recommendation
Scrubber 8	3-6 inches as per vendor's recommendation
Zinc Dust Collector	1-4 inches as per vendor's recommendation

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for each affected emission unit to demonstrate compliance with Conditions of this section, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall collect and record the following items each week for each control device listed in Condition 7.2.8:

- i. Record indicating the proper maintenance of pressure drop monitoring device of each control device. Also, records which indicate that the pressure drop range mentioned in Condition 7.2.8 (a) has not been exceeded for each control device.
  - ii. Record indicating pressure drop monitoring data of each control device.
  - iii. Record and log of scrubbant changes and other O & M parameters of each control device.
- b. Maintenance records of control equipment, pursuant to Condition 7.2.5(a).

#### 7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected emission unit with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. The Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.2.3 or 7.2.8 within 30 days of such an occurrence.

#### 7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected emission units without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

#### 7.2.12 Compliance Procedures

- a. Compliance with the PM emission limits in Condition 7.2.3 is assured by proper operation of the control equipment and by the monitoring and recordkeeping required by Conditions 7.2.8 and 7.2.9.

### 7.3 Mills #3 and #4: Hot Dip Galvanizing Kettle 3 and 4 and Paint Stations

#### 7.3.1 Description

Wheatland Tube Company, Chicago Division, manufactures steel tubing. The process begins with the cleaning of steel strip with a pressurized alkaline cleaning system. The strip is cold formed with a steel-rolling system consisting of progressive dies into the tubular cross-section. The strip is electrically welded into a tube. The tube is then cleaned with an HCl solution and rinsed in a fumeless system. After a final rinse, the tube is induction heated to approximately 800°F (427°C) to prepare the tube for an application of molten zinc galvanizing to the exterior of the tube. After galvanizing the tube is cooled with a water-quench. The tube is then finished to specified dimensions and coated with a corrosion resistant chromate solution. After the chromate solution is applied, a UV coating is applied to the tube exterior. The final process involves cutting the finished product to length. To avoid rusting of the ends of the conduit, a separate end spray is applied at another location in the facility, offline from mill production equipment.

The interior surface of the tube is sprayed with a corrosion resistant and friction reducing coating. This coating is applied with a paint lance that is inserted into the tube so that coating is applied inside the tube beyond the welding point. The interior coating is sprayed in a nitrogen atmosphere and cures during the manufacturing process.

VOM is emitted during coating operations when the solvents within the coating volatilize into the atmosphere during application onto the tubing.

The continuous production Steel Tube Mill #3 includes one hot dip galvanizing kettle, paint stations, HCl storage tanks (Condition 3.1.1 of this permit), associated scrubbers, and dust collector systems and related ancillary equipment. This equipment uses low VOM content materials for coating the interiors of tubes and "emission less" UV coating for the exterior tubes. Steel Tube Mill 3 was constructed in 1998.

The continuous production Steel Tube Mill #4 includes one hot dip galvanizing kettle, paint stations and related ancillary equipment. This equipment uses low VOM and HAP content materials for coating the interiors of tubes and UV coating for the exterior tubes. Mill #4, constructed in 2002, is similar to Mill #3, which began operation in 1998. Because operations on Mill #4 are similar to those on this existing mill, certain requirements of this permit

apply to both Mills #3 and #4 combined as Wheatland proposed to comply with common requirements for these mills. In fact, lower-VOM content coatings are used on Mill #3 due to improved reformulation designed for Mill #4.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
19	Hot Dip Galvanizing Kettle #3	Cartridge Dust Collectors
20	Paint Station	6 Scrubbers
22	Hot Dip Galvanizing Kettle #4	Cartridge Dust Collector
23	Paint Stations and Cutoff	Scrubbers
24	Endspray Paint Station	None

7.3.3 Applicability Provisions and Applicable Regulations

a. An "affected steel tube mill" for the purpose of these unit-specific conditions, is a continuous line consisting of a hot dip galvanizing kettle, a paint station, and associated control equipment as identified in Conditions 7.3.1 and 7.3.2.

b. i. The affected steel tube mills are 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 (see Attachment 2) [35 IAC 212.321(a)].

ii. For this purpose, the galvanizing operation and painting operations, which, being separate points of the mill with their own exhaust points, shall individually comply with this requirement and shall not be aggregated together as similar units.

c. The affected steel tube mills are subject to 35 IAC 218.204(j) (2) (A): Miscellaneous Metal Parts and Product - Extreme performance air dried coating, which provides that:

- i. No owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products Coating. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>Description</u>	<u>kg/liter</u>	<u>lbs/gallon</u>
Air Dried	0.42	3.5

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.
- d. The affected steel tube mills are subject to 35 IAC 203: Major Stationary Source Construction and Modification, which provides that:

- i. No person shall cause or allow the operation of a new major stationary source or modification subject to the requirements of Subpart C of Part 203, except as in compliance with applicable LAER provisions established pursuant to Section 203.301 for such source or modification [35 IAC 203.601], and
- ii. No person shall cause or allow the operation of a new major stationary source or major modification where the owner or operator has demonstrated that it would not interfere with reasonable further progress by providing emission offsets pursuant to Section 203.302 without maintaining those emission offsets or other equivalent offsets [35 IAC 203.602].

Note: The Illinois EPA has determined that use of low VOM and HAP content coatings, as proposed in the application for Permit 02050066, satisfies the requirement for LAER.

- e. The paint stations for the affected steel tube mills are subject to the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM. The Illinois EPA is administering NESHAP in Illinois on behalf of the USEPA under a delegation agreement. Standards and requirements for this NESHAP are in Section 5 (Overall Source Conditions).

#### 7.3.4 Non-Applicability of Regulations of Concern

- a. The affected steel tube mills are not subject to 35 IAC 218.301, use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material. This rule excludes coating lines which use coatings that comply with 35 IAC 218.204 from this requirement.
- b. This permit is issued based on the construction of Mill #4 not being subject to the rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, for emissions of particulate matter or other pollutants. The increase in emissions due to Mill #4 is unrelated to previous projects (e.g., construction of Mill #3 in 1998).
- c. This permit is issued based on the affected steel tube mills not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each emission unit falls in one or more of the following categories:
  - i. Does not use an add-on control device to achieve compliance with a VOM emission limitation or standard; or
  - ii. Is subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

#### 7.3.5 Operational and Production Limits and Work Practices

- a. The following limitations, along with Condition 7.3.5(b), represent the Lowest Achievable Emission Rate as applied to the construction of the affected steel tube mills, as applicable pursuant to 35 IAC 203.301 and 203.601. These limitations were established in Permits 96110025 and 02050066 [T1].
  - i. The VOM content of each coating used on the affected steel tube mills for the interior of tubes, as applied, shall not exceed the following limits. These limits are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM), as applied.
    - A. 1.8 lb VOM/gal for electrical metallic tubing (conduit) with outside diameters less than or equal to 2.0 inches.
    - B. 2.3 lb VOM/gal for other tubing.

Note: The original limit of 2.6 lb VOM/gal for other tubing in Permit 96110025 was reduced to 2.3 lb VOM/gal in Permit 02050066.

- ii. The coatings used on the affected steel tube mills for the exterior of tubes shall be:
  - A. UV cure coatings and powder coatings; or
  - B. Clear water-based coatings that contain less than 1.0 lb VOM/gal (minus water and exempt compounds), provided that the annual emissions from the use of clear water-based exterior coatings meet the limits in Condition 7.3.6(d).
- iii. The coating used on the affected steel tube mills for end spraying shall not exceed 2.1 lb/gal, as applied. This limit is expressed in units of VOM per volume of coating (minus water and exempt compounds), as applied.
- b. The Permittee shall not use any cleanup material on the affected steel tube mills that contains VOM. This condition was established in Permits 96110025 and 02050066 [T1].
- c. The Permittee shall maintain 98.8 tons of VOM emission offsets for Mill #3, which shall be provided from the City of Chicago's Offset Reserve, unless Construction Permit 96110025 is revised to allow offsets to be provided from other sources in the Chicago non-attainment area or the amount of offset emissions is reduced. As a result, the total amount of offsets is 1.3 times the VOM emissions allowed from the construction of Mill #3 or 76 tons/year.
- d. The Permittee shall maintain 93.6 tons of VOM emission offsets for Mill #4, which shall be provided from the complete shutdown of ASF Keystone, Inc., (located in East Chicago, IN), unless Construction Permit 02050066 is revised to allow offsets to be provided from other sources in the Chicago non-attainment area or the amount of offset emissions is reduced. As a result, the total amount of offsets is 1.3 times the VOM emissions allowed from the construction of Mill #4 or 72 tons/year.
- e. The Permittee shall follow good operating practices for the affected steel tube mills and, in accordance with the manufacturer's and/or vendor's recommendations, perform periodic maintenance on the pollution control equipment covered under this permit

such that the pollution control equipment be kept in proper working condition and not cause a violation of the Act or regulations promulgated therein. This condition was established in Permits 96110025 and 02050066.

- f. The following conditions regarding HAP emissions contain revisions to limits established in Permit 02050066. These conditions are revised to indicate that Mill #4 is required to meet standards for "existing" sources rather than standards for "new" sources, pursuant to 40 CFR 63.3882(c) and (e).
  - i. Before the compliance date in 40 CFR 63.3883 (January 2, 2007), the HAP content of coatings used on the affected steel tube mills for all coating operations (i.e., outer diameter, inner diameter and end spray, but does not include emissions generated during galvanizing of tubes), shall not exceed 2.6 lb HAP/gal of coating solids. This limit is expressed in units of weight of organic HAP per volume of coating solids, as applied, and are averaged over all materials used in coating-related operations. This requirement becomes effective upon initial startup of Mill 4.  
  
Note: The NESHAP for the surface coating of miscellaneous metals, as of the date of issuance of this permit, has been promulgated (see Condition 5.2.5(c)). Mill #4 is being required to meet the standards in the draft NESHAP (67 FR 52799) until such time as compliance with the promulgated NESHAP is required, at which time Mill #4 must comply with the adopted standard for existing sources under the NESHAP. Coating applied at this mill falls under the "General Use" category, and compliance may be shown by averaging over all coatings used in the affected steel tube mill as provided for above.
  - ii. The pre-galvanizing cleaning operation shall be "fumeless" with negligible emissions of hydrochloric acid (HCl).
- g. The following operating limits were established in Permit 02050066.
  - i. Mill #4 shall not operate for more than 8,150 hours per year. For this purpose, the mill shall be considered to be operating if galvanizing or internal diameter coating is being performed.

- ii. Molten zinc usage for the affected steel tube mills shall not exceed the following limits:

<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
900	7,535

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected steel tube mills are subject to the following:

- a. The VOM emissions from Mills #3 and #4 shall not exceed the following limitations:

VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
18.0	148.0

These limits reflect the permitted annual emissions of Mill 3, as established in Permit 96110025 and an additional 72 tons of emissions for Mill 4, as established in Permit 02050066. These mills are being addressed together because they are similar and subject to identical regulating requirements. These limits become effective upon initial startup of Mill 4 [T1].

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

- b. Emissions of PM from the Mill #3 shall not exceed 1.62 lb/hr and 7.1 ton/yr. These limits are based on maximum emissions from the Hot Dip Galvanizing Kettle with Cyclone Dust Collectors and Paint Station as measured at a similar source.

The above limitations were established in Construction Permit 96110025, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

- c. i. This permit is issued based on negligible emissions of hydrogen chloride (HCl) from Mill #4. For this purpose, emissions shall

not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

- ii. This permit is issued based on negligible emissions of chromium compounds from the Mill #4. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year).
  - iii. These limits were established in Permit 02050066 [T1].
- d.
- i. Emissions of PM from the galvanizing operation (cyclone dust collectors) on Mill #4 shall not exceed 2.24 lb/hr and 9.1 ton/yr. These limits are based on maximum emissions from this operation.
  - ii. Emissions of PM from the coatings operations on Mill #4 shall not exceed 1.25 lb/hr and 5.2 ton/yr.
  - iii. This permit is issued based on negligible emissions of PM from welding, stenciling and related operations on Mill #4 that are addressed above. For this purpose, particulate matter emissions shall not exceed 0.1 lb/hour and 0.44 tons/year, from each respective operation.
  - iv. These limits were established in Permit 02050066, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].
- e. The annual VOM emissions from the use of clear water-based exterior coatings shall not exceed 6.7 tons/year for Mill #4 or 10.0 tons/year for the combination of Mills #3 and #4. These limitations were established in Permits 96110025 and 02050066 as part of the Lowest Achievable Emission Rate determination (see also Condition 7.3.5(a)) [T1].

#### 7.3.7 Testing Requirements

The following conditions were established in Permits 96110025 and 02050066, pursuant to 35 IAC 201.282.

- a. The Permittee shall analyze representative samples of coating materials used in the affected steel tube mills for VOM content using the procedures specified by 35 IAC 218.105(a). The presence of exempt organic compounds, e.g., acetone, in a coating material shall be determined by manufacturer's data unless an analytical method is approved by USEPA for such purpose. Actual analysis may be conducted by the Permittee, supplier of such coating, or an independent third party laboratory. Material information from analyses performed by the supplier may be provided on respective material safety data sheets provided to the Permittee, which should separately account for additions of any solvent, if and as necessary.
- b. A comprehensive sampling and analysis program shall be conducted within 180 days of startup of Mill #3 to review all interior coatings on the mill. On at least an annual basis thereafter, sampling and analysis shall be conducted for any new supplier of interior coatings or significant changes in coatings provided by current suppliers.
- c. If the total organic HAP content cannot be determined using manufacturer's data, the owner or operator shall submit an alternative procedure for determining the total organic HAP weight fraction for approval by the Illinois EPA and shall sample and analyze for HAP content, if necessary.
- d. Upon written request by the Illinois EPA, the Permittee shall, at its expense, conduct such tests as requested in accordance with the applicable test methods and procedures in 35 IAC 212.110 or 218.105 or other test methods approved by the Illinois EPA, to demonstrate compliance with Condition 7.3.6.

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected steel tube mills to demonstrate compliance with Condition 5.5.1 and the conditions of this section, pursuant to Section 39.5(7)(b) of the Act:

- a. Detailed records as outlined in Condition 7.3.7(a) for sampling and analysis of coatings and cleanup material.

- b. Daily records of the following items for coating materials that contain VOM and HAP:
  - i. A list of the name and identification of each coating as applied, dilution solvent, clean-up solvent, and any other material used containing VOM and/or HAP.
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempt from the definition of VOM) as applied, with supporting calculations.
  - iii. The weight of HAP per volume of coating solids as applied, with supporting calculations.
  - iv. Overall VOM and HAP content of each coating in lb/gal of material and weight percent.
  - v. Data on the type of tubing to which a coating was applied, i.e., electrical tubing or other type of tubing, so as to address compliance with the categorical limits in Condition 7.3.5(a).
  - vi. Other information on the composition of the materials, e.g., density (in lb/gal), fraction water, fraction exempt compounds (in weight or volume percent), volume of solids, as necessary to calculate VOM content less water and exempt compounds and HAP content per gallon of coating solids (lb HAP/gal of solids).
- c. Monthly records of the following items for coating materials that contain VOM and/or HAP:
  - i. Actual usage of coatings, solvent, and any other material used containing VOM and/or HAP in ton/mo.
  - ii. Emissions of VOM, in ton/mo and ton/yr, with supporting calculations.
  - iii. Emissions of HAP, in ton/mo and ton/yr, with supporting calculations.
  - iv. Any changes in the types of coating applied to the exterior of tubes as related to compliance with Condition 7.3.5(a).
  - v. Any changes in the practices for cleanup of the interior coatings as related to compliance with Condition 7.3.5(b).

- d. The Permittee shall maintain records of the following items for the affected steel tube mills:
  - i. Usage of molten zinc, in tons/mo.
  - ii. Maintenance records of control equipment, pursuant to Condition 7.3.5(e).
  - iii. Records that identify each occurrence when the affected steel tube mill is not in compliance with the emission limitations or operating requirements of this permit.

#### 7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected steel tube mill with the permit requirements as follows, 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:

- a. The Permittee shall provide a written report to the Illinois EPA within 200 days of startup of the affected steel tube mill that provides the results of initial testing required by Condition 7.3.7(b) and addresses compliance with Condition 7.3.5(a).
- b. The Permittee shall provide a written report to the Illinois EPA for the results of annual testing required by Condition 7.3.7(b) if it indicates non-compliance with Condition 7.3.5(a), in which case the report shall be submitted within 30 days of receiving the analytical results.
- c. Any record showing a violation of the conditions of this permit, including the operating and emission limits in Conditions 7.3.5 and 7.3.6, shall be reported by sending a copy of such record to the Illinois EPA Compliance Unit within 30 days following the occurrence of the violation.

#### 7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.3.12 Compliance Procedures

- a. Compliance with the VOM content limitations in Condition 7.3.3(c) and 7.3.5(a) shall be determined from the recordkeeping requirements in Condition 7.3.9 and by either testing as required by Condition 7.3.7 or by use of the following formulae:

$$\text{Coating VOM Content} = V \times D / [1 - W \times D], \text{ or}$$
$$\text{Coating VOM Content} = V \times D / [1 - \sum v_i]$$

Where:

V = Percent VOM in the coating (wt.%)

D = Overall coating density (lb/gal)

W =  $\sum (w_i/d_i)$

$w_i$  = Percent exempt compound i in the coating  
(weight percent)

$d_i$  = Density of exempt compound i (lb/gal)

$v_i$  = Percent exempt compound i in the coating  
(volume percent)

and the summation is applied over water and all exempt compounds in the coating.

b. Organic HAP content level determination - averaged coatings. For those uncontrolled emissions that are averaged together in order to comply with the required organic HAP content limits specified in Condition 7.5.5(c) (i), the following procedure shall be used to determine the monthly volume-weighted average mass of organic HAP emitted per volume of coating (solids) as applied.

i. A. Determine the total organic HAP weight fraction as applied of each coating. If any ingredients, including diluent solvent, are added to a coating prior to its application, the organic HAP weight fraction of the coating shall be determined at a time and location in the process after all ingredients have been added.

B. Determine the total organic HAP weight fraction of each coating as applied each month.

1. If no changes have been made to a coating, either as supplied or as applied, or if a change has been made that has a minimal effect on the organic HAP content of the coating, the value previously determined may continue to be used until a change in formulation has

been made by either the manufacturer or the user.

2. If a change in formulation or a change in the ingredients added to the coating takes place, including the ratio of coating to diluent solvent, prior to its application, either of which results in a more than minimal effect on the organic HAP content of the coating, the total organic HAP weight fraction of the coating shall be redetermined.
  - C. Manufacturer's formulation data may be used to determine the total organic HAP content of each coating and any ingredients added to the coating prior to its application.
- ii.
  - A. Determine the volume both in total gallons as applied and in total gallons (solids) as applied of each coating. If any ingredients, including diluent solvents, are added prior to its application, the volume of each coating shall be determined at a time and location in the process after all ingredients (including any diluent solvent) have been added.
  - B. Determine the volume of each coating (solids) as applied each month.
  - C. The volume applied may be determined from company records.
- iii.
  - A. Determine the density of each coating as applied. If any ingredients, including diluent solvent, are added to a coating prior to its application, the density of the coating shall be determined at a time and location in the process after all ingredients have been added.
  - B. Determine the density of each coating as applied each month.
    1. If no changes have been made to a coating, either as supplied or as applied, or if a change has been made that has a minimal effect on the density of the coating, then the value previously determined may continue to be used until a change

in formulation has been made by either the manufacturer or the user.

2. If a change in formulation or a change in the ingredients added to the coating takes place, including the ratio of coating to diluent solvent, prior to its application, either of which results in a more than minimal effect on the density of the coating, then the density of the coating shall be redetermined.

C. The density may be determined from company records, including manufacturer's data sheets. If the density of the coating cannot be determined using the company's records, including the manufacturer's data, then the owner or operator shall submit an alternative procedure for determining the density for approval by the Administrator.

- iv. Compliance with the HAP content limitations in Condition 7.5.5(c) shall be determined from the recordkeeping requirements in Condition 7.5.9 and by either testing as required by Condition 7.5.7 or by use of the following formulae:

$$\text{Coating HAP Content} = \frac{\sum (H_i \times D_i)}{\sum S_i / 100}$$

Where:

$H_i$  = Percent organic HAP in coating  $i$  (wt.%)

$D_i$  = Overall coating density of coating  $i$   
(lb/gal)

$S_i$  = Percent solids content of coating  $i$ , by volume

and the summation is over all coatings used per month.

Note: This is the compliance methodology established by USEPA in the National Emission Standards for Hazardous Air Pollutants for similar coating operations requiring averaging.

- c. Compliance with the VOM emission limitations in Conditions 5.5.1, 7.3.5, and 7.3.6 shall be determined from the recordkeeping and testing required by this section and the following equation:

$$\begin{aligned} \text{VOM Emissions (lb)} = & \text{Coating Usage (gal)} * \\ & \text{Coating Density (lb/gal)} * \text{VOM Content of} \\ & \text{Coating (wt.\%)} + \text{Solvent/Thinner Usage (gal)} * \\ & \text{VOM Content of Solvent/Thinner (wt.\%)} * \\ & \text{Solvent/Thinner Density (lb/gal)}. \end{aligned}$$

The Permittee may use the VOM content from MSDS if that specific coating material is applied as supplied.

- d. Recordkeeping, monitoring, and testing requirements of this section shall be used to determine compliance with the particulate matter emissions limits.

## 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, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source, and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after October 27, 2004 (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 Program

No permit revision shall be required for increases in emissions allowed under any approved economic incentive, marketable permits, emissions trading, or 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)

### 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 that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. 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. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. 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;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. 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 process, emissions, or composition 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

If monitoring is required by any applicable requirements or conditions of this permit, 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 deviation 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:

- 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
    - Bureau of Air
    - Compliance Section (MC 40)
    - P.O. Box 19276
    - Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Regional Field Office
    - Illinois Environmental Protection Agency
    - Division of Air Pollution Control
    - 9511 West Harrison
    - Des Plaines, Illinois 60016
  - iii. Illinois EPA - Air Permit Section
    - Illinois Environmental Protection Agency
    - Divisions of Air Pollution Control
    - Permit Section (MC 11)
    - P.O. Box 19506
    - Springfield, Illinois 62794-9506
  - iv. USEPA Region 5 - Air Branch
    - United States EPA (AE - 17J)
    - Air & Radiation Branch (Illinois - Indiana)
    - 77 W. 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.

#### 8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

## 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 Clean Air Act, 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 Clean Air Act; and
  - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- 9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 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 Clean Air Act 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 Environmental Protection 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)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- 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 authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any regulated activity, discharge or emission at the source authorized by this permit.

#### 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)(0)(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) 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. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certifications shall include descriptions on 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: \_\_\_\_\_

10.2 Attachment 2 - Particulate Matter Emissions from Process Emission Units

10.2.1. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321]

- a. 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 which, 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 [35 IAC 212.321(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

Where:

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

- i. Up to process weight rates of 408 Mg/hr (450 T/hr):

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

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

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

- c. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

<u>Metric</u>		<u>English</u>	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>T/hr</u>	<u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.2.2. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322]

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

Where:

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

- i. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.985	4.10

B	0.67	0.67
C	0	0

ii. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

c. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

<u>Metric</u>		<u>English</u>	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>T/hr</u>	<u>lb/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

10.3 Attachment 3 - Baseline Emissions Summary

Seasonal VOM emissions from excluded units, in tons/season (TPS):

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination</u>	<u>Notes</u>
Tube Mill #3	25.6000	<u>12.1120</u>	2
Total:		12.1120	

Seasonal VOM emissions from units subject to further reduction, in TPS:

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination</u>	<u>Notes</u>
6 Tube Painting Lines	40.5000	<u>32.1968</u>	1
Total:		32.1968	

Note 1: For coatings, emissions are based on actual usage of each individual coating with adjustments based on compliance with the 3.5 lb/gal regulatory limit. These emissions are lower than the proposed baseline because the VOM emission limit used to calculate over compliance in the application was 4.3 lb/gal.

2: This is a contingent unit for which three seasons of data have been obtained. A LAER demonstration was approved for this unit on January 30, 1997, so it is excluded from further reduction. The emissions were adjusted for overcompliance to the permitted VOM content requirements of each coating to 2.6 lb VOM/gal, minus water and exempt compounds.

The source shall maintain records of actual seasonal VOM emissions for all emission units not considered insignificant activities in accordance with the recordkeeping and compliance procedures identified in the CAAPP permit starting with the 1998 seasonal allotment period of May 1 through September 30. The source shall submit the seasonal emissions information, as a component of the Annual Emissions Report by October 31 of each year, pursuant to 35 IAC 205.300.

**TOTAL SOURCE ALLOTMENT = 12.112 + 0.88 x 32.1968 = 40.4452 TPS**

**OR 405 ATU**

1 ATU equals 200 lbs of VOM [35 IAC 205.130], or using standard conversion rate of 2000 lbs per ton, 10 ATU's equals 1 ton.

Please note that claims of over compliance, under compliance and/or BAT may have been modified to reflect the requirements of the ERMS Program at 35 IAC 205.

#### 10.4 Attachment 4 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
  - Corrects typographical errors;
  - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - Requires more frequent monitoring or reporting by the Permittee;
  - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
  - Do not violate any applicable requirement;
  - Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
  - Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.

10.5 Attachment 5 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
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JS:psj