

Attention:

Precoat Metals
Attn: Anu Singh
25 Northgate Industrial Drive
Granite City, Illinois 62040

State of Illinois

CLEAN AIR ACT PERMIT
PROGRAM (CAAPP) PERMIT

Source:

Precoat Metals
25 Northgate Industrial Drive
Granite City, Illinois 62040

I.D. No.: 119040ADM
Permit No.: 95120111

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Type of Application: Renewal

Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 119040ADM

Permit No.: 95120111

Statement of Basis No.: 95120111-1208

Date Application Received: July 27, 2006

Date Issued: December 18, 2012

Expiration Date: December 18, 2017

Renewal Submittal Date: 9 Months Prior to Expiration Date

Source Name: Precoat Metals

Address: 25 Northgate Industrial Drive

City: Granite City

County: Madison

ZIP Code: 62040

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

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

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

ECB:MTR:DLR:jws

cc: IEPA, Permit Section
IEPA, FOS, Region 3

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Date Received: 07/27/2006
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Section 1 - Source Information

1. AddressesSource

Precoat Metals
25 Northgate Industrial Drive
Granite City, IL 62040

Owner

Sequa Corporation
300 Blaisdell Road
Orangeburg, NY 10962

Operator

Precoat Metals
1310 Papin Street, 3rd Floor
St. Louis, MO 63103

Permittee

The Operator of the source as identified in this table.

2. ContactsCertified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Kurt Russell	Vice President of Manufacturing
<i>Delegated Authority</i>	Dennis Harper	Plant Manager

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Michael Christopher	(618) 451-0909 x3426	Michael_Christopher@precoat.com
<i>Technical Contact</i>	Anu Singh	(314) 436-7010 x3307	anu_singh@precoat.com
<i>Correspondence</i>	Anu Singh	(314) 436-7010 x3307	anu_singh@precoat.com
<i>Billing</i>	Anu Singh	(314) 436-7010 x3307	anu_singh@precoat.com

3. Single Source

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

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Section 2 - General Permit Requirements

1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
 - i. An emergency occurred and the source can identify the cause(s) of the emergency.
 - ii. The source was at the time being properly operated.
 - iii. The source submitted notice of the emergency to the IEPA within 2 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.
 - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

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

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source 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]

c. Duty to Maintain Equipment

The source 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. [Section 39.5(7)(a) of the Act]

d. Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

- i. The source must pay fees to the IEPA 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]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
 - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
 - B. As otherwise authorized by the Act.
- v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
 - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
 - B. The liability of the Owner or Operator of the 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.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source 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]

4. Testing

- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of

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any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator: The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

b. Retention of Records

- i. 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]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of requested material would make this overly burdensome, in which case, the Permittee

shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
 - A. The identification of each term or condition of this permit that is the basis of the certification.
 - B. The compliance status.
 - C. Whether compliance was continuous or intermittent.
 - D. 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.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source 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 which were applicable 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 IEPA, 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 31, 2012 (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way

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affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR."
 - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN."
 - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

9. Reopening and Revising Permit

a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or

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termination, 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]

b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA 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 source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

10. Emissions Trading Programs

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

11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(l) and (o) of the Act]
- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item

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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.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 - Source Requirements

1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, 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 toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.
- ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

b. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), 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:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.
- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

c. Asbestos Demolition and Renovation

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or

demolish pursuant to Condition 3.1(c)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.

- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

d. NESHAP Standards (40 CFR 63 Subpart DDDDD)

Pursuant to 40 CFR 63.7495(b), no later than March 21 , 21014, the source must:

- i. Meet the applicable general provisions of 40 CFR 63 Subpart A. See Condition 7.3(b).
- ii. Have a one-time energy assessment performed on the source as specified in 40 CFR 63 Subpart DDDDD Table 3 Condition 3, pursuant to 40 CFR 63.7500(a)(1).

e. Future Emission Standards

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee 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 Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

2. <u>Applicable Plans and Programs</u>
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Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive PM Operating Program

- i. Pursuant to 35 IAC 212.309, this source shall be operated under the provisions of Fugitive PM Operating Program prepared by the Permittee and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). The Permittee shall comply with the Fugitive PM Operating Program and any amendments to the Fugitive PM Operating Program submitted pursuant to Condition 3.2(a)(ii). As a minimum, the Fugitive PM Operating Program shall include provisions identified in 35 IAC 212.310(a) through (g) and the following:
 - A. A detailed description of the best management practices utilized to achieve compliance with 35 IAC 212.304 through 212.308.
 - B. Estimated frequency of application of dust suppressants by location.
 - C. Such other information as may be necessary to facilitate the IEPA's review of the Fugitive PM Operating Program.
- ii. Pursuant to 35 IAC 212.312, the Fugitive PM Operating Program shall be amended from time to time by the Permittee so that the Fugitive PM Operating Program is current.

Such amendments shall be consistent with the requirements set forth by this Condition 3.2(a) and shall be submitted to the IEPA within 30 days of such amendment. Any future revision to the Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

- iii. The Fugitive PM Operating Program, as submitted by the Permittee on 09/16/2002, is incorporated herein by reference. The document constitutes the formal Fugitive PM Operating Program required under 35 IAC 212.310, addressing the control of fugitive particulate matter emissions from all plant roadways, including the iron-making and steel-making roads, storage piles, access areas near storage piles, and other subject operations located at the facility that are subject to 35 IAC 212.309.
- iv. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Fugitive PM Operating Program, any amendments or revisions to the Fugitive PM Operating Program (as required by Condition 3.2(a)), and the Permittee shall also keep a record of activities completed according to the Fugitive PM Operating Program.

b. PM₁₀ Contingency Measure Plan

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM₁₀ Contingency Measure Plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM₁₀ Contingency Measure Plan.

c. Episode Action Plan

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.
- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on September 24, 2002, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO₂, PM₁₀, NO₂, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.

- v. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

d. Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit 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, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

3. Title I Requirements

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

4. Synthetic Minor Limits

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
 - I. Requirements in Conditions 3.1(a)(i), 3.1(b), 3.1(c), and 3.1(d).
 - II. Requirements in Conditions 3.2(a), 3.2(b), 3.2(c), and 3.2(d).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

b. Semiannual Reporting

i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	July 31
July through December	January 31

ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

Section 4 - Emission Unit Requirements

4.1 Coil Coating Line 3

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Coil Coating Line 3 Consisting of: Prime Coating Section and Finish Coating Section	Opacity, PM, SO ₂ , VOM, and HAPs	1980	1995	Prime Coat Afterburner (AB-1) Finish Coat Afterburner (AB-2)	Combustion Temperature Monitors

The prime and finish coating sections each contain a paint applicator, a curing oven with afterburner and a cooler section.

2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act. The requirements are applicable to the entire coating lines unless the permit condition specifically identifies the applicable process component (e.g. curing oven, afterburner)

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a). no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b) and 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each coating line, oven, or common stack in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the coating line or oven, maintenance and repair and/or adjustment of the operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. **Particulate Matter Requirements (PM)**

A. Pursuant to 35 IAC 212.321, the Permittee shall follow Section 7.2(a) for new process emission units for which construction or modification commenced on or after April 14, 1972.

ii. **Compliance Method (PM Requirements)**

Recordkeeping

A. Pursuant to 35 IAC 266.115(a), the process weight rate for painting operations is calculated by using the weight of the paint and solvent used.

B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:

- I. The hours of operation of the coil coating line, hr/mo and hr/yr.
- II. Weight of paint and solvent used in the coil coating line, lbs/mo and lbs/yr.
- III. A file containing the method used by the Permittee to determine allowable emission rate of PM in lbs/hr, with supporting documentation.
- IV. The emissions of PM from the coating line, tons/mo and tons/yr (12 month rolling average), with supporting calculations.

c. i. **Sulfur Dioxide Requirements (SO₂)**

A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

ii. **Compliance Method (SO₂ Requirements)**

Monitoring

A. Pursuant to 39.5(7)(a) of the Act, the Permittee shall use pipeline quality natural gas or natural gas certified by gas supplier in the coil coating line curing ovens and associated afterburners.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act the Permittee shall maintain records of:

- I. The hours of operation of the ovens and associated afterburners (hours/month);
- II. Type and quantity of fuel fired in the ovens and associated afterburners (mmscf/month);
- III. Certification documents from the gas supplier.

d. i. **Volatile Organic Material Requirements (VOM)**

- A. NSPS Standards (40 CFR 60 Subparts A and TT)
 - I. Pursuant to 40 CFR 60.1, the provisions of 40 CFR 60 Subpart A apply to the Permittee.
 - II. Pursuant to 40 CFR 60.462(a)(3), the Permittee shall not cause to be discharged into the atmosphere more than 10 percent of the VOC's applied for each calendar month (90 percent emission reduction).
- B. Pursuant to 35 IAC 219.207(b)(1), Coil Coating Line #3 shall be equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency.
- C. Pursuant to Construction Permit #950600026: [T1]
 - I. Coil Coating Line #3 shall be equipped and operated with capture and control equipment that provides an overall reduction in VOM emissions of at least 97 percent.
 - II. The overall emissions control with afterburner shall be 97% at a minimum for emissions of VOM, except when non-organic surface treatment is being applied which contains less than 1% by-weight VOM
- D. Pursuant to Operating Permit #95120111, emissions of volatile organic material (VOM) from the coil coating line shall be limited to the following: [T1]
 - I. The coil coating line is subject to the following: [T1]

VOM Solvent Usage		Overall Control Efficiency	VOM Emissions	
(T/Mo)	(T/Yr)	(%)	(T/Mo)	(T/Yr)
750	4,519.8	97	22.5	135.7

ii. Compliance Method (VOM Requirements)

Monitoring

- A. Pursuant to Construction Permit #950600026, compliance with the annual emission limits shall be determined for a running total of 12 months of data.
- B. Pursuant to 40 CFR 60.464(c), the Permittee shall calibrate, operate and maintain a device for each afterburner that continuously records the combustion temperature of any effluent gases incinerated. The Permittee shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal afterburner used to control emissions remains more than 28°C (50°F) below the temperature at which compliance with Condition 4.1.2(d)(i)(A)(II) was demonstrated during the most recent performance test required by Permit Condition 4.1.2(d)(ii)(E).
- C. Pursuant to 35 IAC 219.207, 219.105(d)(2)(B) and Construction Permit #950600026, each afterburner shall be equipped with continuous temperature indicators and strip chart recorders or disk storage for the afterburners combustion chamber temperatures.

Testing

- D. Pursuant to 40 CFR 60.463(b), the Permittee shall determine the monthly volume-weighted average emissions of VOC'S in kg (or lbs) of coating solid applied for each calendar month using the procedures in 40 CFR 60.463(c), providing control device and capture system operating conditions have not changed.
- E. Pursuant to 35 IAC 219.211(a), upon request the VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A. Method 24 testing provided by the manufacturer is sufficient for this requirement.
- F. Pursuant to Section 39.5(7)(d) of the Act, the Permittee shall conduct tests in accordance with procedures adopted by the Illinois EPA pursuant to 35 IAC 219.105(c) through (f) to measure the performance of the afterburners controlling the coil coating lines at least every five years. The next test must be completed within 180 day of issuance of this permit renewal if previous test was completed more than five years ago.
- G. If the Permittee intends to take credit for VOM containing waste shipped off-site then the percent concentration of solvent in the VOM containing waste from the coating lines shall be determined.
- H. The Permittee must comply with the requirements of Sections 7.1 for any testing completed to satisfy the requirements of this permit

Recordkeeping

- I. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records:
 - I. Applicable notification and record keeping requirements of the NSPS, 40 CFR 60.7, 60.464 and 60.465.
 - II. VOM Solvent usage per month.
 - III. All data and calculations used to determine monthly VOM solvent usage for Line #3.
 - IV. Monthly VOM emissions for Line #3. These values shall be calculated by using the procedures specified in 40 CFR 60.463(c)(2).
 - V. All data and calculations used to determine monthly actual VOM emissions for Line #3.
 - VI. VOM contents of all coatings used including VOM content testing results or formulation data.
 - VII. Amount of VOM containing waste shipped off-site and VOM content test records of this waste.
- J. Pursuant to 35 IAC 219.211(e)(2), the Permittee shall comply with the recordkeeping requirements which consist of:
 - IV. Daily exit temperature for each afterburner.
 - II. A log of operating for the capture systems, control devices, and associated coating line.
 - III. A maintenance log for the capture systems, control devices, monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

e. i. Hazardous Air Pollutant Requirements (HAP)

- A. Pursuant to 40 CFR 63.5120(a)(2), the Permittee must limit organic HAP emissions of each coil coating line to no more than 0.046 kilogram (kg) of organic HAP per liter of solids (0.38 pounds of organic HAP per gallon of solids) applied during each 12-month compliance period.
- B. Pursuant to 40 CFR 63.5130(e), for the purpose of demonstrating continuous compliance, a compliance period consists of 12 months including the current month and the preceding 11 months.
- C. Pursuant to 40 CFR 63.5120(b), and 40 CFR 63.5170(d), the Permittee must comply with the provisions of 40 CFR 63.5170(f)(1) because of the use of thermal oxidation to demonstrate compliance with organic-HAP emission rate in Permit Condition 4.1.2(e)(i)(A).
- D. Pursuant to 40 CFR 63.5140(b), the Permittee must meet the applicable general provisions of 40 CFR 63 Subpart A as required in Permit Section 7.3(a).

ii. Compliance Method (HAP Requirements)

Monitoring and Testing

- A. Pursuant to 40 CFR 63.5160(b)(2) and 40 CFR 63.5170(f)(1)(vii), the Permittee must determine the organic HAP content of each coating material applied during the month. This may be done using the total volatile matter content as weight fraction of nonaqueous volatile matter and use it as a substitute for organic HAP, using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the coating and the results provided to the Permittee.
- B. Pursuant to 40 CFR 63.5160(c) and 40 CFR 63.5170(f)(1)(viii), the Permittee must determine the solids content of each coating material applied during the month. This may be done using ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 (incorporated by reference, see 40 CFR 63.14). The ASTM determination may be performed by the manufacturer of the material and the results provided to the Permittee.
- C. Pursuant to 40 CFR 63.5170(f)(1)(ix), the Permittee must calculate the organic HAP emitted during the month, H_e , for each month for each coating line oven and associated afterburner, using Equation 8 of 40 CFR 63.5170.

NOTE: For periods when the afterburner has not operated within its established operating limit, the control device efficiency is determined to be zero.

- D. Pursuant to 40 CFR 63.5170(f)(1)(x), the Permittee must calculate the HAP emission rate based on solids applied for the 12 month compliance period using Equation 6 of 40 CFR 63.5170.

Recordkeeping

- E. Pursuant to 40 CFR 63.5190(a)(2) and 40 CFR 63.10(b)(2), The Permittee must maintain the records of all measurements needed to demonstrate compliance including:
 - I. Organic HAP content data for the purpose of demonstrating compliance in accordance with Permit Condition 4.1.2(e)(ii)(A);

- II. Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with Permit Condition 4.1.2(e)(ii)(B);
- III. Material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with Permit Condition 4.1.2(e)(i)(C); and
- IV. Records specified in 40 CFR 63.10(b)(3).

f. i. Operational and Production Requirements

- A. Pursuant to 40 CFR 63.5121, the Permittee must meet the operating limits in 40 CFR 63 Subpart SSSS Table 1 for the thermal oxidizers (i.e. afterburners) established during performance testing completed according to 40 CFR 63.5160(d)(3)(i).
- B. Pursuant to 40 CFR 63.5121, the Permittee must meet the operating limits in 40 CFR 63 Subpart SSSS Table 1 for emission capture system which requires developing a monitoring plan in accordance with 40 CFR 63.5150(a)(4).
- C. Pursuant to 40 CFR 63.5160(d)(3)(i) & 40 CFR 63.5170(f)(1)(i), The Permittee must establish operating limits for the afterburners in accordance with the following:
 - I. During the performance test, the Permittee must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The Permittee must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.
 - II. Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for your thermal oxidizer.
- D. Pursuant to 40 CFR 63.5160(e)(2) and 40 CFR 63.5170(f)(1)(iii), The Permittee must determine capture efficiency (CE) for each work station according to the protocols for testing with temporary total enclosures that are specified in Method 204A through F of 40 CFR Part 51, Appendix M. The Permittee may exclude "never controlled" work stations from such capture efficiency determinations. Periodic tests of the afterburners required by Permit Condition 4.1.2(d)(2)(ii)(F) must also meet the requirements in this permit condition.

NOTE: "never controlled" for the purpose of this Permit Condition means a workstation which is not equipped with provisions by which any emissions, including those in the exhaust from any associated curing oven, may be delivered to a control device.
- E. Pursuant to 40 CFR 63.5170(f)(1)(v), the Permittee must calculate the overall organic HAP control efficiency, R, achieved using Equation 7 in 40 CFR 63.5170.
- F. Pursuant to 40 CFR 60.462(a)(3), the Permittee shall ensure each coating line continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency. The average temperature at the exits of the afterburners during the April 2005 emission test of 1293°F and 1358°F for the prime and finish lines, respectively, apply. These temperatures apply until superseded by a temperature value from a new emission test showing compliance with the required control efficiency.

- G. Pursuant to 35 IAC 219.207(c), the Permittee shall operate each coating line in accordance with the requirements of Permit Condition 4.1.2(d)(i)(B).
 - H. Pursuant to Construction Permit #950600026, capture and control equipment shall be operated whenever the coil coating line is in operation (emitting volatile organic material (VOM)) at the most recently demonstrated overall efficiency, except when non-organic surface treatment is being applied which contains less than 1% by-weight VOM, as measured by Method 24, 40 CFR 60, Appendix A. [T1]
- ii. Compliance Method (Operational and Production Requirements)

Monitoring and Testing

- A. Pursuant to 40 CFR 63.5150(a)(3) and 40 CFR 63.5170(f)(1)(ii), whenever the coating line ovens are operated continuously, the Permittee must calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment either if you choose not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1 °Celsius, whichever is greater.

NOTE: For an oxidizer to demonstrate continuous compliance with an operating limit the thermocouple or temperature sensor must be in the combustion chamber in the combustion chamber at a location in the combustion Zone.

- B. Pursuant to 40 CFR 63.5150(a)(4) and 40 CFR 63.5170(f)(1)(iv), whenever the coating line ovens are operated continuously, the Permittee must develop a capture system monitoring plan containing the information in 40 CFR 63.5150(a)(4)(i-ii) and conduct monitoring of the capture system in accordance with the monitoring plan.
- C. Pursuant to Construction Permit #950600026, Compliance with Permit Condition 4.1.2(d)(i)(C) shall be demonstrated by testing and operating consistent with the conditions used during testing, i.e., maintaining the minimum afterburner temperature. [T1]

Recordkeeping

- D. Pursuant to 40 CFR 63.5190 (a)(2)(ii) and 40 CFR 63.10(b)(2), the Permittee must maintain records of all measurements needed to demonstrate compliance with control device and capture system operating data in accordance with Permit Conditions 4.1.2(f)(ii)(A - B).
- E. Pursuant to 40 CFR 63.5190 (a)(2)(v) and 40 CFR 63.10(b)(2), the Permittee must maintain records of all measurements needed to demonstrate compliance with the overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with Permit Conditions 4.1.2(f)(i)(C - E)
- F. Pursuant to 35 IAC 219.211(e)(2), the Permittee shall collect and record the following information each day for each coil coating line:
 - I. Afterburner temperature monitoring data.

- III. A log of operating for time for each afterburner, temperature monitoring system and the associated coil coating line.
- IV. A maintenance log for each afterburner and associated temperature monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.
- G. Pursuant to Construction Permit #95060026, the Permittee shall maintain a record of the specific times when the non-organic treatment is applied at the prime or finish coaters, including documentation that demonstrates coating material was non-organic [T1]
- H. Pursuant to Section 39.5(7)(b) of the Act, the Permittee must maintain records related to the exclusive use of acetone as a cleaning solvent to maintain exclusion from requirements in 35 IAC 219.187.

g. i. Work Practice Requirements

- A. Pursuant to 40 CFR 60.11(d) and Construction Permit #95060026, at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source..

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of the coil coating line and associated auxiliary equipment.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. The coil coating line is not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP), 40 CFR Part 63 Subpart JJJJ, because the plant is operated under National Emission Standards for Hazardous Air Pollution (NESHAP), 40 CFR Part 63 Subpart SSSS and the coating lines are not considered web coating line as defined in 40 CFR 63.3300.
- b. Pursuant to 35 IAC 214.304, the coil coating line curing ovens are not subject to 35 IAC 214 Subpart B through F, because the ovens burn exclusively natural gas and are located inside the St Louis major metropolitan area.

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- c. The coil coating line curing ovens are not subject to 35 IAC 216.121, because the ovens are not fuel combustion emission units as defined by 35 IAC 211.2470.
- d. The coil coating line curing ovens are not subject to 35 IAC 217.141, because the ovens are not fuel combustion emission units as defined by 35 IAC 211.2470.
- e. The coil coating line curing ovens are not subject to 35 IAC 217.180, because the ovens are not process heaters as defined by 35 IAC 211.5195.
- f. The coil coating lines are not subject to the requirements of 35 IAC 219.187 for solvent cleaning operations because of exclusive use of acetone as a cleaning solvent which is not an organic material for the purpose of 35 IAC 219 as defined by 35 IAC 211.4250(b).
- g. The coil coating lines are subject to the emission limitations of 35 IAC 219.204(d) but these limitations not applicable because the source has elected to comply with the alternative emission limitations in 35 IAC 219.207.
- h. The coating line is not subject to the emission limitations of 35 IAC 219.301 or 219.302 because these general requirements do not apply to coating operations subject to the emission limitations of 35 IAC 219.204.
- i. The coil coating line is not subject to 35 IAC 219 Subpart TT, because coil coating is a specified category in 35 IAC 219 Subpart F which are specifically excluded pursuant to 35 IAC 219.980.
- j. The coil coating line is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources of HAPs because the coil coating line is subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).
- k. The coil coating line is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources of VOM, because the coil coating line is subject to NSPS requirements proposed after November 15, 1990 pursuant to 40 CFR 64.2(b)(1)(i).
- l. The coil coating line is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources of PM and SO₂, because the coil coating line does not use an add-on control device to achieve compliance with these emission limitations or standards.

4. Other Requirements

a. Start-up, Shutdown, and Malfunction Breakdown Requirements

i. Authorization for Federal Requirements

- A. Pursuant to 40 CFR 63.5140(a), the Permittee must be in compliance with the standards in 40 CFR 63 Subpart SSSS at all times, except during periods of start-up, shutdown, and malfunction of any capture system and control device used to comply with 40 CFR 63 Subpart SSSS.
- B. Pursuant to 40 CFR 63 Subpart A, the permittee must comply with the applicable requirements in 40 CFR 63 Subpart A during startup, shutdown and malfunction breakdown of the capture system and associated afterburners as specified in Section 7.3(a) of the permit.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

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a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), 4.1.2(c)(i), 4.1.2(d)(i), 4.1.2(e)(i), 4.1.2(f)(i), and 4.1.2(g)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

b. Federal Reporting

- i. Pursuant to 40 CFR 60.465(d), the Permittee shall submit reports to the Administrator semiannually when the thermal incinerator temperature drops as defined under 40 CFR 60.464(c) and Condition 4.1.2(d)(ii)(A). If no such periods occur, the Permittt shall state this in the report.
- ii. Pursuant to 40 CFR 63.5180, the Permittee must Submit the reports specified below to the IEPA Regional Office that serves the territory and to the IEPA State Office:
 - A. A Notification of Performance Test as specified in 40 CFR 63.7, 40 CFR 63.9(e), and 40 CFR 63.5180(c).
 - B. Performance Test Reports as specified in 40 CFR 63.10(d)(2) and 40 CFR 63.5180(e).
 - C. Startup, Shutdown and Malfunction Reports as specified in 40 CFR 63.10(d)(5) and 40 CFR 63.5180(f)(1-2)
 - D. A semi-annual compliance report containing the information specified in 40 CFR 63.5180(g)(1) and (2), and
 - E. For each deviation occurring at the affected source, information specified in 40 CFR 63.5180(h)(1) through (3).

4.2 Boiler B1

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Boiler B1 25.11 mmBtu/hr Natural Gas	Opacity, CO, NOx & HAP	1995	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b) and 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the boiler in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the boiler, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, if required, the Permittee shall keep records for all opacity measurements made in accordance with Method 9.

b. i. Carbon Monoxide Requirements (CO)

A. Pursuant to 35 IAC 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.

- B. Pursuant to Construction Permit #95110038, emissions and operation of equipment shall not exceed the following limits: [T1]

Firing Rate	CO Emissions	
mmBtu/hr	lb/hr	ton/yr
25.11	0.88	3.85

ii. Compliance Method (CO Requirements)

- A. Compliance with annual limits in Condition 4.2.2 (b)(i)(B) shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months. [T1]
- B. The periodic monitoring requirements sufficient to meet 39.5(7)(f) of the Act are addressed by the tune-up requirements in 4.2.2(d), the operational and production requirements in Condition 4.2.2(e), and the work practice requirement in Condition 4.2.2(f).

c. i. Nitrogen Oxide Requirements (NO_x)

- A. Pursuant to Construction Permit #95110038, emissions and operation of equipment shall not exceed the following limits: [T1]

Firing Rate	NO _x Emissions	
mmBtu/hr	lb/hr	ton/yr
25.11	3.52	15.42

ii. Compliance Method (NO_x Requirements)

- A. Compliance with annual limits in Condition 4.2.2 (c)(i)(A) shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months. [T1]
- B. The periodic monitoring requirements sufficient to meet 39.5(7)(f) of the Act are addressed by the tune-up requirements in Condition 4.2.2(d), the operational and production requirements in Condition 4.2.2(e), and the work practice requirement in Condition 4.2.2(f).

d. i. Hazardous Air Pollutant Requirements (HAP)

- A. Pursuant to 40 CFR 63.7485 no later than March 21, 2014, the Permittee must comply with the applicable requirements in 40 CFR 63 Subpart DDDDD and the general provisions of 40 CFR 63 Subpart A as specified in Condition 7.3(b).

ii. Compliance Method (HAP Requirements)

Monitoring

- A. Pursuant to 40 CFR 63.7500(a)(1) and 40 CFR 63 Subpart DDDDD Table 3, conduct a tune-up of the boiler annually as specified in 40 CFR 63.7540. Pursuant to 40 CFR 63.7515(e), each annual tune-up must be no more than 13 months after the previous tune-up. Pursuant to 40 CFR 63.7540(a)(12), if the boiler is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.
- B. Pursuant to 40 CFR 63.7540(a)(10)(i) through 63.7540(a)(10)(v), each annual tune-up shall consist of:
- I. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the burner inspection may be

delayed until the next scheduled unit shutdown, but each burner must be inspected at least once every 36 months).

- II. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- III. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
- IV. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
- V. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).

Recordkeeping

- C. Pursuant to 40 CFR 63.7540(a)(10)(vi)(A) through (C), maintain records of each tune-up as follows:
 - I. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler.
 - II. A description of any corrective actions taken as a part of the combustion adjustment.
 - III. The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of the reporting requirements of 40 CFR 63.7550. See also Condition 4.2.5(b).

e. i. Operational and Production Requirements

- A. NSPS Standards (40 CFR 60 Subparts A and Dc)
 - I. Pursuant to 40 CFR 60.1, the provisions of 40 CFR 60 Subpart A apply to the owner or operator.
 - II. Pursuant to 40 CFR 60.48c(g)(2) and Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the boiler.

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to 40 CFR 60.48c(g)(2) and Section 39.5(7)(b) of the Act the Permittee shall maintain records of:
 - I. The hours of operation of the boiler (hours/month).
 - II. Type and quantity of fuel fired in the boiler (mmcf/month).

f. i. Work Practice Requirements

A. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source..

ii. Compliance Method (Work Practice Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of the boilers and associated auxiliary equipment.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. Pursuant to 40 CFR 63.11193 and 63.11195(e), the boiler is not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP), 40 CFR Part 63 Subpart JJJJJJ, because the boiler is located at a major source of HAPs and uses natural gas exclusively.
- b. The boiler is not subject to PM limitation in 35 IAC 212.206 because the boiler is not exclusively liquid fueled and is only fueled by natural gas.
- c. The boiler is not subject to PM-10 limitation in 35 IAC 212.210, because the boiler only uses natural gas which is specifically excluded from the requirement.
- d. The boiler is not subject to the fugitive PM limitations in 35 IAC 212.316, because the boiler is located outside the area defined by 35 IAC 212.324(a)(1)(c).
- e. The boiler is not subject to PM limitation in 35 IAC 212.321 because the boiler is a fuel combustion unit as defined by 35 IAC 211.2470.
- f. The boiler is not subject to SO₂ limitations in 35 IAC 214.141 or 214.161, because the boiler is not fueled by solid or liquid fuels and is only fueled by natural gas.
- g. The boiler is not subject to NO_x limitations in 35 IAC 217.141, because the actual heat input of the boiler is less than 250 mmBtu/hr.
- h. The boiler is not subject NO_x General Requirements in to 35 IAC 217.150, because the potential to emit NO_x for the boiler is less than 100 tons per year.

- i. Pursuant to 35 IAC 219.303, the boiler is not subject to the VOM limitations in 35 IAC 219.301 and 219.302, because the boiler is a fuel combustion emission unit as defined in 35 IAC 211.2470.
- j. The boiler is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for any pollutant, because the boiler does not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), 4.2.2(d)(i), 4.2.2(e)(i), and 4.2.2(f)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

b. Federal Reporting

- i. NESHAP Reporting (40 CFR 63 Subpart DDDDD):
 - A. Pursuant to 40 CFR 63 Subpart DDDDD, no later than March 21, 2014 the source:
 - I. Must meet the applicable notification requirements of 40 CFR 63.7545 and 40 CFR Part 63 Subpart A; and
 - II. Must meet the applicable reporting requirements of 40 CFR 63.7550.

Section 5 - Additional Title I Requirements

This Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.

Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

- Pursuant to 35 IAC 201.146, the following activities at the source constitute insignificant activities obligated to comply with Sections 9.1(d) and Section 39.5 of the Act; Sections 165, 173, and 502 of the Clean Air Act; or any other applicable permit or registration requirements:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Sulfuric Acid Storage Tank	1	35 IAC 201.210(a)(1) and 201.211
Lime Storage Silo	1	35 IAC 201.210(a)(1) and 201.211

a. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements in addition to the applicable requirements in Condition 6.4:

i. Title I Requirements (Construction Permit #93100059) [T1]

- A. This permit is issued based on negligible emissions of particulate matter and sulfur dioxide from sulfuric acid storage tank. For this purpose emissions of these contaminants shall not exceed nominal emission rates of 0.01 lb/hour and 0.044 ton/yr.

Compliance Method

- B. The Permittee shall maintain records for the following items:
 - I. An operating log when material is added to the sulfuric acid storage tank.
 - II. A maintenance log for the sulfuric acid storage tank.

ii. Title I Requirements (Construction Permit #97100077) [T1]

- A. Emissions and operation of the lime storage silo shall not exceed the following limits:

<u>Material</u>	<u>Process Weight Rate (Ton/Mo)</u>	<u>Particulate Matter Emissions</u>	
		<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
Hydrated Lime	41.23	372	2.19

These limits are based on maximum operation and the allowable emission limitation from 35 IAC 212.321, as specified in Permit Section 7.2.

- B. The dust collector shall be operated at all times the silo is being filled.

Compliance Method

- C. Compliance with annual limits shall be determined from a running total of 12 months of data.
- D. The Permittee shall maintain records for the following items:
 - I. A log of operating time for the dust collector and silo filling.

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II. A maintenance log for the dust collector.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any Insignificant Activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Emission unit not emitting more than 1.0 lb/hr of any regulated non-HAP air pollutant and 0.1 lb/hr of HAP in the absence of air emission control equipment, and not a process unit: Bulk Solvent Storage Tanks - 2 Inkjet Printer - Exit End Line - 1 Painting Waste Solvent Drums - 1 Wastewater Treatment Chrome Tank - 1 Paint Mixing - 1 Aqueous Cleaner Stage - 1 Hot water Rinses - 1 Chemical Treatment of Metal - 1 Final Rinse - 1	15	201.211(a)
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4): Natural Gas Fired Space Heater - 200,000 Btu/hr	1	35 IAC 201.210(a)(4)
Equipment used to melt or apply < 50,000 lbs/yr of wax where no organic solvent has been added: Solventless Waxer	1	35 IAC 201.210(a)(7)

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 (see Conditions 7.2(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 which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 219.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 219.302, 219.303, 219.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.

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- e. Pursuant to 35 IAC 219.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 219.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.
- f. Pursuant to 35 IAC 219.182, for each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 219.182, except as provided in 35 IAC 219.181.
- g. Pursuant to 35 IAC 219 Subpart TT, VOM emissions from insignificant activities required to be included in determining applicability of 35 IAC 219 Subpart TT, in conjunction with applicable emission units in Section 4 of this permit, shall not equal or exceed 100 ton/yr.
- h. Pursuant to 35 IAC 219 Subpart TT, VOM emissions from each insignificant activities that is exempt from 35 IAC 219 Subpart TT shall not equal or exceed 2.5 tons per calendar year; and total VOM emissions from insignificant activities, in conjunction with applicable emission units in Section 4 of this permit not complying with 35 IAC 219.986, shall not exceed 5.0 tons per calendar year.

5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed.
- b. Potential to emit emission calculations before any air pollution control device for each insignificant activity.

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. A construction permit is not required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):
 - A. A description of the emission unit including the function and expected operating schedule of the unit.
 - B. A description of any air pollution control equipment or control measures associated with the emission unit.
 - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
 - D. The means by which emissions were determined or estimated.

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- E. The estimated number of such emission units at the source.
- F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.

- ii. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. A construction permit is not required. Addresses are included in Attachment 3.
- iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any change made in Condition 6.6(a) above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit. A construction permit is not required.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required. A construction permit is not required.

Section 7 - Other Requirements

1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
 - i. The name and identification of the emission unit(s) being tested.
 - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
 - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - iv. 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 emission unit and any control equipment will be determined.
 - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
 - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:
 - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
 - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
 - ii. A summary of results.
 - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
 - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - v. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vii. An explanation of any discrepancies among individual tests or anomalous data.
 - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
 - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
 - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. PM Process Weight Rate Requirements

a. New Process Emission Units - 35 IAC 212.321

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

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM 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 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation [35 IAC 212.321(b)]:

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

Where:

P = Process weight rate (T/hr)
 E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54
 B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8
 B = 0.16

iii. Limits for New Process Emission Units [35 IAC 212.321(c)]:

<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>	<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

3. 40 CFR 63 Subpart A Requirements (NESHAP)

a. 40 CFR 63 Subpart A and SSSS - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil

Pursuant to 40 CFR 63 Subpart A and SSSS, the Permittee shall comply with the following applicable General Provisions as indicated:

<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.1	Yes	General Applicability of the General Provisions	All except 63.1(b)(1) and Reserved 63.1(a)(5), (a)(9), (c)(3), and (d)
40 CFR 63.2	Yes	Definitions	
40 CFR 63.3	Yes	Units and Abbreviations	
40 CFR 63.4	Yes	Prohibited Activities and Circumvention	All except Reserved 63.4(a)(4)
40 CFR 63.5	Yes	Preconstruction Review and Notification Requirements	Only total HAP emissions in terms of tons per year are required for 63.5(d)(1)(ii)(H), and all others except Reserved 63.5(b)(2), and (c)
40 CFR 63.6	Yes	Compliance with Standards and Maintenance Requirements	All except 63.6(e) & (h) and Reserved 63.6(b)(6), (c)(3-4), (d), and (i)(15)
40 CFR 63.7	Yes	Performance Testing Requirements	All except Reserved 63.7(a)(2)(vii-viii)
40 CFR 63.8	Yes	Monitoring Requirements	All except 63.8(c)(4-6), (d-e), (f)(6), (g)(5), and Reserved 63.8(a)(3)
40 CFR 63.9	Yes	Notification Requirements	63.5180(b)(1) provides 2 years for submittal of initial notifications from submittal requirements under 63.9(b)(2). All others except 63.9(f), (g), and Reserved 63.9(h)(4)
40 CFR 63.10	Yes	Recordkeeping and Reporting Requirements	All except 63.10(b)(2)(vi, x, xi & xiii), (c)(1-15), (d)(3), (e)
40 CFR 63.11	Yes	Control Device and Work Practice Requirements	
40 CFR 63.12	Yes	State Authority and Delegations	
40 CFR 63.13	Yes	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Yes	Incorporations by Reference	
40 CFR 63.15	Yes	Availability of Information and Confidentiality	
40 CFR 63.16	Yes	Performance Track Provisions	

b. 40 CFR 63 Subpart A and DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Pursuant to 40 CFR 63 Subpart A and DDDDD, the Permittee shall comply with the following applicable General Provisions as indicated:

<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.1	Yes	General Applicability of the General Provisions	All except Reserved 63.1(a)(5, 7-9), (b)(2), (c)(3-4), and (d)
40 CFR 63.2	Yes	Definitions	
40 CFR 63.3	Yes	Units and Abbreviations	
40 CFR 63.4	Yes	Prohibited Activities and Circumvention	
40 CFR 63.5	Yes	Preconstruction Review and Notification Requirements	
40 CFR 63.6	Yes	Compliance with Standards and Maintenance Requirements	All except 63.6(e)(1)(i-ii), (e)(3), (f)(1), (h)(1), and Reserved 63.6(b)(6), (c)(3-4), (d), (e)(2), (e)(3)(i), (h)(3), and (h)(5)(iv)
40 CFR 63.7	Yes	Performance Testing Requirements	All except 63.7(e)(1)
40 CFR 63.8	Yes	Monitoring Requirements	All except 63.8 (c)(1)(i) & (iii), (d)(3) last sentence, and Reserved 63.8(a)(3)
40 CFR 63.9	Yes	Notification Requirements	All except Reserved 63.9(b)(3), and (h)(4)
40 CFR 63.10	Yes	Recordkeeping and Reporting Requirements	All except 63.10(b)(2)(ii), (iv-v), (b)(3), (c)(10-11, 15), (d)(3, 5), and Reserved 63.10(c)(2-4, 9)
40 CFR 63.11	No	Control Device and Work Practice Requirements	
40 CFR 63.12	Yes	State Authority and Delegations	
40 CFR 63.13	Yes	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Yes	Incorporations by Reference	
40 CFR 63.15	Yes	Availability of Information and Confidentiality	
40 CFR 63.16	Yes	Performance Track Provisions	

Section 8 - State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, 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. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

<i>Pollutant</i>		<i>Tons/Year</i>
Volatile Organic Material	(VOM)	135.60
Sulfur Dioxide	(SO ₂)	0.25
Particulate Matter	(PM)	11.88
Nitrogen Oxides	(NO _x)	41.15
HAP, not included in VOM or PM	(HAP)	-
Total		188.88

Attachment 1 - List of Emission Units at This Source

<i>Section</i>	<i>Emission Units</i>	<i>Description</i>
4.1	Coil Coating Line 3	Coil Coating Line consisting of Primary and Finish Coating Sections both equipped with afterburners.
4.2	Boiler B1	25.22 Million Btu/hr Natural Gas Boiler used for plant heating

Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
BTU	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO ₂	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EAF	Electric arc furnace
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
HP	Horsepower
hr	Hour
H ₂ S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
KW	Kilowatts
LAER	Lowest Achievable Emission Rate

Precoat Metals
I.D. No.: 119040ADM
Permit No.: 95120111

Date Received: 07/27/2006
Date Issued: 12/18/2012

lb	Pound
m	Meter
MACT	Maximum Achievable Control Technology
mm	Million
mon	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing 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 permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

Attachment 3 - Contact and Reporting Addresses

<p style="text-align: center;">IEPA Compliance Section</p> <p style="text-align: center;">IEPA Stack Test Specialist</p> <p style="text-align: center;">IEPA Air Quality Planning Section</p> <p style="text-align: center;">IEPA Air Regional Field Operations Regional Office #3</p> <p style="text-align: center;">IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, IL 60016</p> <p>Phone No.: 847/294-4000</p>
	<p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Regional Office #3 2009 Mall Street Collinsville, IL 62234</p> <p>Phone No.: 618/346-5120</p>
	<p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, IL 62794-9506</p> <p>Phone No.: 217/782-2113</p>
<p style="text-align: center;">USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, IL 60604</p> <p>Phone No.: 312/353-2000</p>

Attachment 4 - Example Certification by a Responsible Official

SIGNATURE BLOCK

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.

I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))

AUTHORIZED SIGNATURE:

BY:

AUTHORIZED SIGNATURE

TITLE OF SIGNATORY

_____/_____/_____

TYPED OR PRINTED NAME OF SIGNATORY

DATE

Precoat Metals
I.D. No.: 119040ADM
Permit No.: 95120111

Date Received: 07/27/2006
Date Issued: 12/18/2012