

217/782-2113

RENEWAL
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Granite City Slag, LLC
Attn: Bill Emmendorfer, Plant Manager
One Racehorse Drive
East St. Louis, Illinois 62207

I.D. No.: 119040ATF
Application No.: 99120072

Date Received: July 13, 2006
Date Issued: September 3, 2009
Expiration Date¹: September 3, 2014

Operation of: Slag Processing
Source Location: 20th & Edwardsville Road, Granite City, Madison County, 62040
Responsible Official: Bill Emmendorfer, Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a slag processing facility, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

ECB:RWC:jws

cc: Illinois EPA, FOS, Region 3
CES
Lotus Notes

1 Except as provided in Conditions 1.5 and 8.7 of this permit.

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1.0 INTRODUCTION

1.1 Source Identification

Granite City Slag, LLC
20th and Edwardsville Road
Granite City, Illinois 62040
618/452-8120

I.D. No.: 119040ATF
County: Madison
Standard Industrial Classification: 5093, Scrap and Waste Materials

1.2 Owner/Parent Company

Granite City Slag, LLC
One Racehorse Drive
East St. Louis, Illinois 62207

1.3 Operator

Granite City Slag, LLC
One Racehorse Drive
East St. Louis, Illinois 62207

Bill Emmendorfer, Plant Manager
618/452-8120

1.4 Source Description

The source produces various sizes of slag for commercial sale and used for road base, sewer main construction, and other purposes.

Note: This narrative description is for informational purposes only and is not enforceable.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include PSD and MSSCAM, and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains Title I conditions that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

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
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MSSCAM	Major Stationary Sources Construction and Modification (35 IAC 203, New Source Review for non-attainment areas)
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
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
PSD	Prevention of Significant Deterioration (40 CFR 52.21, New Source Review for attainment areas)
RMP	Risk Management 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

3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

None

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

None

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

None

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

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

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 2	Primary Jaw Crusher (Model 1654)	1999	Residual Moisture
Unit 3	Primary Cone Crusher (Model RRC54)	2005	Residual Moisture
Units 4 & 5	Secondary Crushing (Models 1400 and RC54)	1998	Residual Moisture
Unit 6	Primary Screening (Model I6203-32)	2005	Residual Moisture
Units 7, 8 & 9	Secondary Screening (Model FSG6203-32, 7203-38LP, 7203)	1998-1999	Residual Moisture
Unit 1	Feed Hopper (Model VFG-4826)	2005	Residual Moisture
Conveyors	Conveyors	New (2005) and Existing (1998 and 1999)	Water Spray Bars
Surge bin	Surge bin	1998	Residual Moisture
Truck Unloading	Truck Unloading	1998	Residual Moisture
Fugitive PM Emissions	Fugitive PM Emissions From: - Equipment Traffic - Storage Piles - Wind Erosion	N/A	Water Truck Water Cannon Water Cannon

5.0 OVERALL SOURCE CONDITIONS

5.1 Applicability of Clean Air Act Permit Program (CAAPP)

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of PM₁₀, PM_{2.5}, NO_x, VOM, CO, SO₂ and HAP emissions.

5.1.2 For purposes of the CAAPP, Granite City Slag, LLC is considered a single source with United States Steel Corporation - Granite City Works, I.D. No. 119813AAI, located at 1951 State Street, Granite City. The Permittees have elected to obtain separate CAAPP permits for their operations.

In addition to Granite City Slag, LLC, the following independent operators/premittees are considered a single source with U.S. Steel and have elected to obtain separate CAAPP permits for those operations:

- a. Stein Steel Mill Services (I.D. 119813AAD) located at 20th Street and Edwardsville in Granite City.
- b. Gateway Energy & Coke Co LLC (I.D. 119040ATN) located at Edwardsville Road in Granite City.
- c. AKJ Industries, Inc (I.D. 119040AEB) located at 20th and State Streets in Granite City.
- d. Oil Technology Inc (I.D. 119040ATG) located at Rte 203 in Granite City.

Note: Although this source itself is not a major source for any regulated air pollutant or hazardous air pollutant, it is treated by this permit as a major source considering the single source status of all co-located sources operated at the U.S. Steel property in Granite City.

5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment) and/or PM_{2.5} and attainment or unclassifiable for all other criteria pollutants (CO, lead, NO₂, PM₁₀, SO₂).

5.3 Source-Wide Applicable Provisions and Regulations

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

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

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

5.3.3 Ozone Depleting Substances

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

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.3.4 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 owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.5 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or

35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).

- b. 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.

5.3.6 Episode Action Plan

- a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144 and is incorporated by reference into this permit.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

5.3.7 PM₁₀ Contingency Measure Plan

This stationary source meets the criteria in 35 IAC 212.700 and is required to prepare and submit a contingency measure plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The plan submitted to the Illinois EPA is incorporated by reference into this permit and shall be implemented by the Permittee in accordance with 35 IAC 212.704 following notification by the Illinois EPA. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U.

5.3.8 Fugitive Particulate Matter Operating Program

- a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)]. The Permittee shall comply with the fugitive particulate matter operating program, submitted to the Illinois EPA and incorporated by reference into this permit, and any amendments to the program submitted pursuant to paragraph b below.
- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.4 Source-Wide Non-Applicability of Regulations of Concern

Source-wide non-applicability of regulations of concern are not set for this source. However, there are terms for unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there are requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	---
Sulfur Dioxide (SO ₂)	---
Particulate Matter (PM)	5.98
Nitrogen Oxides (NO _x)	---
HAP, not included in VOM or PM	---
Total	5.98

5.6.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.6.3 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for PSD, state rules for MSSCAM, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, 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:

- a. Testing by Owner or Operator: The Illinois EPA 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 Illinois EPA, at such reasonable times as may be specified by the Illinois EPA 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 Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].
- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, 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 [35 IAC 201.282(b)].

- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there are provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.1 Records for HAP Emissions

The Permittee shall maintain records of HAP emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, pursuant to Section 39.5(7)(f)(ii)

of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

5.10.2 Annual Emissions Report

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

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source.

5.12 Source-Wide Compliance Procedures

5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed by the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

This section is reserved for emissions control programs. As of the date of issuance of this permit, there are no such programs applicable to this source.

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Slag Processing Units

7.1.1 Description

The facility utilizes various screens and crushers to process slag from United States Steel Corporation into an aggregate.

Note: This narrative description is for informational purposes only and is not enforceable.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 2	Primary Jaw Crusher (Model 1654)	1999	Residual Moisture
Unit 3	Primary Cone Crusher (Model RRC54)	2005	Residual Moisture
Units 4 & 5	Secondary Crushing (Models 1400 and RC54)	1998	Residual Moisture
Unit 6	Primary Screening (Model I6203-32)	2005	Residual Moisture
Units 7, 8 & 9	Secondary Screening (Model FSG6203-32, 7203-38LP, 7203)	1998-1999	Residual Moisture

7.1.3 Applicable Provisions and Regulations

- a. The "affected slag processing units" for the purpose of these unit-specific conditions, are the emission units described in Conditions 7.1.1 and 7.1.2.
- b. Pursuant to 35 IAC 212.123,
 - i. 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.
 - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 1000 ft radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions

permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

- c. Pursuant to 35 IAC 212.301, 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.
- d. Pursuant to 35 IAC 212.316:
 - i. No person shall cause or allow fugitive particulate matter emissions generated by the crushing or screening of slag, stone, coke or coal to exceed an opacity of 10 percent [35 IAC 212.316(b)].
- e. Pursuant to 35 IAC 212.321, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates determined by using the equation:

$$E = 2.54 (P)^{0.534}$$

where

P = Process weight rate in T/hr

E = Allowable emission rate in lbs/hr

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected slag processing units are not subject to the New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing Plants, 40 CFR Part 60, Subpart 000, because slag is not a nonmetallic mineral, and any plant dedicated to processing slag does not meet the definition of a nonmetallic mineral processing plant (See the Applicability Determination Index (ADI) Control Number 9900001).
- b. The affected slag processing units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected slag processing plant does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.1.5 Control Requirements and Work Practices

- a. The Permittee shall follow good operating practices for the affected slag processing units, including periodic inspection at least on a monthly basis (see condition 7.1.8), routine maintenance and repair of defects within 30 days.
- b. The Permittee shall implement an operating program for the affected slag processing units that reflects good air pollution practices to minimize emissions of particulate matter from the affected units.
- c.
 - i. Pursuant to 35 IAC 212.308, crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations shall be sprayed with water or a surfactant solution, utilize choke-feeding or be treated by an equivalent method in accordance with an operating program.
 - ii. Water sprays shall be used utilized at an adequate flow rate* on the emission units associated with the affected slag processing units (e.g., crushers, conveyors, and stockpiles, etc.) as necessary, except when weather conditions are below or expected to fall below freezing temperatures, to produce an adequate moisture content percentage by weight* or higher to reduce particulate matter emissions and to maintain compliance with the applicable visible emissions standards for each piece of processing equipment used in the production process.
 - * The water flow rate and moisture content percentage by weight will be established during the testing of Condition 7.1.7(b).
- d.
 - i. The affected slag processing units shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 IAC 212.310 and 212.312, and prepared by the owner or operator and submitted to the Agency for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a).
 - ii. Minimum Operating Program: As a minimum the operating program shall include the following, pursuant to 35 IAC 212.310:
 - A. The name and address of the source.

- B. The name and address of the owner or operator responsible for execution of the operating program.
- C. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source.
- D. Location of unloading and transporting operations with pollution control equipment.
- E. A detailed description of the best management practices utilized to achieve compliance with this Subpart, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized.
- F. Estimated frequency of application of dust suppressants by location of materials.
- G. Such other information as may be necessary to facilitate the Agency's review of the operating program.

iii. The operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with this 35 IAC 212.310 and shall be submitted to the Agency for its review, pursuant to 35 IAC 212.312.

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected slag processing units is subject to the following:

- a. i. PM emissions from the affected slag processing units and the affected slag handling units of Section 7.2 in total shall not exceed the following limits:

<u>(Lbs/Ton)</u>	<u>(Lbs/Hour)</u>	<u>(Tons/Year)</u>	<u>Annual Operating Hours</u>
0.0097	2.42	2.9	2400

These limits are based on the calculations presented in the Construction permit application.

- ii. The amount of slag processed by the affected slag processing units, determined as slag actually processed through the crushing plant, shall not exceed 70,000 tons/month and 600,000 tons/year.
- iii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].
- iv. The above limitations were established in Permit 05080091, pursuant to PSD. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for PSD [T1].

7.1.7 Testing Requirements

- a. i. The Permittee shall have the opacity of the emissions from the affected slag processing units during representative weather and operating conditions determined by a qualified observer in accordance with USEPA Test Method 9, as further specified below, pursuant to Section 39.5(7)(d) of the Act.
 - A. For each affected slag processing unit, testing shall be conducted at least annually. For this purpose, testing shall first be conducted within three months of the effective date of this condition.
 - B. Upon written request by the Illinois EPA, such testing shall be conducted for specific affected slag processing unit(s) within 45 calendar days of the request or on the date agreed upon by the Illinois EPA, whichever is later.
- ii. The duration of opacity observations for each test shall be at least 30 minutes (five 6-minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent.
- iii. A. The Permittee shall notify the Illinois EPA at least 7 days in advance of the date and time of these tests, in order to allow the Illinois EPA to witness testing. This notification shall include the name and employer of the qualified observer(s).

- B. The Permittee shall promptly notify the Illinois EPA of any changes in the time or date for testing.
- iv. The Permittee shall provide a copy of its observer's readings to the Illinois EPA at the time of testing, if Illinois EPA personnel are present.
- v. The Permittee shall submit a written report for this testing within 15 days of the date of testing. This report shall include:
 - A. Date and time of testing.
 - B. Name and employer of qualified observer.
 - C. Copy of current certification.
 - D. Description of observation condition, including recent weather.
 - E. Description of the operating conditions of the affected operations.
 - F. Raw data.
 - G. Opacity determinations.
 - H. Conclusions.
- b. At the time of the testing required by Condition 7.1.7(a)(i), the Permittee shall establish the water flow rate for the spray bars and the moisture content percentage by weight of the slag to be used for Condition 7.1.5(c)(ii).
 - I. The water flow rate shall be the average water flow rate utilized during a successful compliance test required by Condition 7.1.7(a).
 - II. The moisture content percentage by weight shall be the resulting moisture content percentage by weight of the slag after the application of the average water flow rate utilized during a successful compliance test required by Condition 7.1.7(a).
- c. Upon written request by the Illinois EPA, the Permittee shall have the particulate matter (PM) emissions determined from the affected slag processing units, during representative weather and operating conditions, in accordance with USEPA Test Method 5, pursuant to Section 39.5(7)(d) of the Act. Such testing shall be conducted within 45 calendar days of the request or on the date agreed upon by the Illinois EPA, whichever is later.

- d. The moisture content of a representative sample of the slag processed in the affected slag processing units shall be measured at least once per week using ASTM Procedures (C566-97) for total moisture content of material.

7.1.8 Monitoring Requirements

- a.
 - i. If an affected slag processing unit(s) is routinely operated or exercised to confirm that the affected slag processing unit(s) will operate when needed, the operation and opacity of the affected slag processing unit(s) shall be formally observed by operating personnel for the affected slag processing unit(s) or a member of source owner or operator's environmental staff on a regular basis to assure that the affected slag processing unit(s) is operating properly, which observations shall be made at least every six months.
 - ii. If an affected slag processing unit(s) is not routinely operated or exercised, i.e., the time interval between operation of an affected slag processing unit(s) is typically greater than six months, the operation and opacity of the affected slag processing unit(s) shall be formally observed as provided above each time the source owner or operator carries out a scheduled exercise of the affected slag processing unit(s).
 - iii. The source owner or operator shall also conduct formal observations of operation and opacity of an affected slag processing unit(s) upon written request by the Illinois EPA. With the agreement of the Illinois EPA, the source owner or operator may schedule these observations to take place during periods when it would otherwise be operating the affected slag processing unit(s).

Note: The formal observation required above is not intended to be a USEPA Test Method 9 opacity test, nor does the observation require a USEPA Test Method 9 certified observer. It is intended to be performed by personnel familiar with the operation of the affected slag processing unit(s) who would be able to make a determination based from the observed opacity as to whether or not the affected slag processing unit(s) was running properly, and subsequently initiate a corrective action if necessary.

- b. The Permittee shall perform inspections of the affected slag processing units on at least a monthly basis, including associated control measures, while the affected slag processing units are in use, to confirm compliance with the requirements of Condition 7.1.5 and Condition

7.1.6. The inspections may be scheduled so that only a number of affected slag processing units are reviewed during each inspection, provided however, that all affected slag processing units that are in routine service shall be inspected at least once during each calendar month, pursuant to Sections 39.5(7)(a) and (d) of the Act.

- c. The Permittee shall perform detailed inspections of any dust collection equipment for the affected slag processing units. At least every 15 months, while the processes are out of service, perform an initial inspection before any maintenance and repair activities are conducted as well as a follow-up inspection performed after any such activities are completed, pursuant to Sections 39.5(7)(a) and (d) of the Act.
- d. The water supply to the spray equipment shall be equipped with a metering device used to determine water usage for the control of particulate matter emissions.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected slag processing units to demonstrate compliance with Conditions 5.6.1, 7.1.5, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a.
 - i. Amount of slag processed, tons/mo and tons/year.
 - ii. Operating hours, hrs/month and hrs/year.
 - iii. PM emissions with supporting calculations based from the record keeping as required by this condition.
 - iv. Information identifying any deviation from Condition 7.1.3, 7.1.5, or 7.1.6.
 - v. A file containing the particulate matter emission factors for the affected slag processing units and affected open areas (lbs/ton) used by the Permittee to calculate emissions, with supporting documentation.
 - vi. A file containing the most current Operating Program for the affected slag processing units, with supporting documentation.
 - vii. Date and utilization records for the water spray or surfactant solution application pursuant to Condition 7.1.5(c).
- b.
 - i. Information for the testing conducted pursuant to Condition 7.1.7, which shall at a minimum include the

formal report for the measurements with date, time, personnel, the operating condition, and copies of the raw data sheets for the measurements.

- ii. Information for the formal observations of opacity conducted pursuant to Condition 7.1.8(a). For each occasion on which observations are made, these records shall include the date, time, identity of the observer, a description of the various observations that were made, whether or not the affected slag processing unit(s) was running properly, and whether or not corrective action is necessary and was subsequently initiated.
- c. Recordkeeping pursuant to 35 IAC 212.316(g):
- i. The owner or operator of any fugitive particulate matter emission unit shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of this Section and shall submit to the Agency an annual report containing a summary of such information.
 - ii. The records required under this subsection shall include at least the following:
 - A. The name and address of the source.
 - B. The name and address of the owner and/or operator of the source.
 - C. A map or diagram showing the location of all emission units controlled, including the location, identification, length, and width of roadways.
 - D. For each application of water or chemical solution to roadways by truck: the name and location of the roadway controlled, application rate of each truck, frequency of each application, width of each application, identification of each truck used, total quantity of water or chemical used for each application and, for each application of chemical solution, the concentration and identity of the chemical.
 - E. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent and, if diluted, percent of concentration, used each day.

- F. A log recording incidents when control measures were not used and a statement of explanation.
- iii. Copies of all records required by this Condition shall be submitted to the Agency within ten (10) working days after a written request by the Agency and shall be transmitted to the Agency by a company-designated person with authority to release such records.
- iv. The records required under this Condition shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Agency representatives during working hours.
- d. The Permittee shall keep the following file(s) and log(s):
 - i. File(s) containing the following information for the affected slag processing units, with supporting information, which shall be kept up to date:
 - A. Information related to the dust collection equipment associated with the affected operations, including design control efficiency or performance specifications and maximum design particulate matter emissions, gr/dscf.
 - ii. Maintenance and repair log(s) for the air pollution control equipment associated with the affected slag processing units, including dust suppressant application systems, which log(s) shall list the activities performed on each item of equipment or system, with date and description.
- e. The Permittee shall maintain records of the following for the inspections required by Condition 7.1.8:
 - i. For the inspections required by Condition 7.1.8(b) for each affected slag processing units:
 - A. Date and time the inspection was performed and name(s) of inspection personnel.
 - B. The observed condition of the control measures for each affected slag processing units, including the presence of any visible emissions.
 - C. A description of any maintenance or repair associated with established control measures that is recommended as a result of the inspection and a review of outstanding recommendations for maintenance or repair from previous inspection(s), i.e., whether

recommended action has been taken, is yet to be performed or no longer appears to be required.

- D. A summary of the observed implementation or status of actual control measures, as compared to the established control measures.
- ii. For the inspections required by Condition 7.1.8(c) for the dust collection equipment for affected operations:
 - A. Date and time the inspection was performed and name(s) of inspection personnel.
 - B. The observed condition of the equipment.
 - C. A summary of the maintenance and repair that is to be or was conducted on the equipment.
 - D. A description of any maintenance or repair that is recommended as a result of the inspection and a review of outstanding recommendations for maintenance or repair from previous inspection(s), i.e., whether recommended action has been taken, is yet to be performed or no longer appears to be required.
 - E. A summary of the observed condition of the equipment as related to its ability to reliably and effectively control emissions.
- f. The Permittee shall maintain records of the following for each incident when any affected slag processing units operated without the established control measures:
 - i. The date of the incident and identification of the affected slag handling units that were involved.
 - ii. A description of the incident, including the established control measures that were not present or implemented; the established control measures that were present, if any; other control measures or mitigation measures that were implemented, if any; and the magnitude of the PM emissions during the incident.
 - iii. The time at and means by which the incident was identified, e.g., scheduled inspection or observation by operating personnel.
 - iv. The length of time after the incident was identified that the affected operations continued to operate before established control measures were in place or the operations were shutdown (to resume operation

only after established control measures were in place) and, if this time was more than one hour, an explanation why this time was not shorter, including a description of any mitigation measures that were implemented during the incident.

- v. The estimated total duration of the incident, i.e., the total length of time that the affected operations ran without established control measures and the estimated amount of coal handled during the incident.
- vi. A discussion of the probable cause of the incident and any preventative measures taken.
- vii. A discussion whether Condition 7.1.3(b) may have been violated during the incident, with supporting explanation as needed.

f. Records addressing the moisture content:

- i. The Permittee shall maintain records of all moisture content tests performed in accordance with Condition 7.1.1(d), including: date, time, individual performing test, and location of sample (e.g., prior to crushing, stockpiles, etc.).
- ii. The Permittee shall maintain operating logs for the water spray equipment, including dates and times of usage, malfunctions (type, date, and measures taken to correct), water pressure, and dates when there was at least 0.25" of rainfall during the preceding 24 hours and the water spray equipment was not operated.
- iii. The Permittee shall maintain weekly records of water consumption in the spray equipment, as determined by the meter required by Condition 7.1.8(d).
- iv. The Permittee shall maintain records of the established water flow rate and moisture content percentage from Condition 7.1.7(b) for Condition 7.1.5(c)(ii).

7.1.10 Reporting Requirements

a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected slag processing units with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- i. Emissions of PM from the affected slag processing units in excess of the limits specified in Conditions 7.1.3 or 7.1.6 within 30 days of such occurrence.
 - ii. Operation of the affected slag processing units in excess of the limits specified in Condition 7.1.6 within 30 days of such occurrence.
 - iii. Failure to utilize water sprays or surfactant solution application as required by 7.1.5(c) or follow the particulate matter Operating Program as required by 7.1.5(d) within 30 days of such occurrence.
- b.
 - i. The owner or operator of any fugitive particulate matter emission unit subject to 35 IAC Subpart K shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of 35 IAC Subpart K and shall submit to the Agency an annual report containing a summary of such information, pursuant to 35 IAC 212.316(g)(1).
 - ii. A quarterly report shall be submitted to the Agency stating the following: the dates any necessary control measures were not implemented, a listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of this Section. This report shall be submitted to the Agency thirty (30) calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31, pursuant to 35 IAC 212.316(g)(5).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected slag processing units.

7.1.12 Compliance Procedures

- a. Compliance with the PM emission limitations of Conditions 7.1.3(b)-(e) is addressed by the requirements of Condition 7.1.5(a)-(d), the testing requirements in Condition 7.1.7, the monitoring requirements of 7.1.8, the records required in Condition 7.1.9, and the reports required in Condition 7.1.10(a).

- b. Compliance with Condition 7.1.5(c) is addressed by the records and reports required in Conditions 7.1.9(a) and 7.1.10(a).
- c. Compliance with the emission limits in Conditions 5.6 and 7.1.6(a) is addressed by the records and reports required in Conditions 7.1.9 and 7.1.10(a) and the emission factors and formulas listed below:
 - i. Emission factors for the affected slag processing units:

PM Emission Factors	
<u>Pollutant</u>	<u>(lb/ton)</u>
Crushers	0.0030
Screens	0.0036

The emission factors (lb/ton) are from AP-42 Section 11.19.2, table 11.19.2-2 (dated 08/04).

Note: The emission factors provided above already take account the effects of control by wet suppression, therefore no further emission control credit is warranted.

- ii. Emission formula for the affected slag processing units:

$$(\text{PM Emissions, ton}) = [(\text{The Appropriate Emission Factor, lb/ton}) \times (\text{Throughput, tons/month and tons/year})] / 2000 \text{ lb/ton}$$

7.2 Slag Handling Units

7.2.1 Description

The Permittee transfers and stores slag in a series of operations, including truck unloading, various conveyor belts (with associated hoppers, diverters, and transfer points), storage pile stackers and feeders. These operations first handle slag, as supplied by United States Steel Corporation - Granite City Works, which is then processed by the crushers, and screens. Particulate matter (PM) emissions associated with these operations are controlled by the moisture content of the slag and the use of water spray bars.

Note: This narrative description is for informational purposes only and is not enforceable.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 1	Feed Hopper (Model VFG-4826)	2005	Residual Moisture
Conveyors	Conveyors	New (2005) and Existing (1998 and 1999)	Water Spray Bars
Surge bin	Surge bin	1998	Residual Moisture
Truck Unloading	Truck Unloading	1998	Residual Moisture

7.2.3 Applicable Provisions and Regulations

- a. The "affected slag handling units" for the purpose of these unit-specific conditions, are the Slag handling units described in Conditions 7.2.1 and 7.2.2.
- b. Pursuant to 35 IAC 212.123,
 - i. 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.
 - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 1000 ft radius from the center point of any other

such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

- c. Pursuant to 35 IAC 212.301, 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.
- d. Pursuant to 35 IAC 212.316(f), no person shall cause or allow fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent.

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected Slag handling units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected Slag handling units do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.
- b. The affected Slag handling units are not subject to 35 IAC 212.321 or 212.322 because of the disperse nature of the operations, as generally addressed by 35 IAC 212.323.

7.2.5 Control Requirements and Work Practices

- a. The Permittee shall follow good operating practices for the affected slag handling units, including periodic inspection at least on a monthly basis (see condition 7.2.8), routine maintenance and repair of defects within 30 days.
- b. The Permittee shall implement an operating program for the affected slag handling units that reflects good air pollution practices to minimize emissions of particulate matter from the affected units.
- c. The Permittee shall implement and maintain control measures for the affected operations, such as enclosure, natural surface moisture, application of dust suppressant, or the use of dust collection devices, that minimize visible emissions of particulate matter and provide a assurance of compliance with the applicable emission standards in Conditions 7.2.3, 7.2.6, and 7.1.3 (see note below), pursuant to Section 39.5(7)(a) of the Act.

Note: The use of dust suppressant water spray bars carries forward residual moisture as a control measure for the affected slag processing units of section 7.1. Therefore sufficient water is to be applied to ensure

a moisture content necessary to address compliance with Condition 7.1.3(c).

- d. Pursuant to 35 IAC 212.305, all conveyor loading operations to storage piles specified in 35 IAC 212.304 (See Condition 7.3.5(c)) shall utilize spray systems, telescopic chutes, stone ladders or other equivalent methods in accordance with the operating program required by 35 IAC 212.309, 212.310 and 212.312.
- e. Pursuant to 35 IAC 212.308, crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations shall be sprayed with water or a surfactant solution, utilize choke-feeding or be treated by an equivalent method in accordance with an operating program.
- f.
 - i. The affected slag handling units shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 IAC 212.310 and 212.312, and prepared by the owner or operator and submitted to the Agency for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a).
 - ii. Minimum Operating Program: As a minimum the operating program shall include the following, pursuant to 35 IAC 212.310:
 - A. The name and address of the source.
 - B. The name and address of the owner or operator responsible for execution of the operating program.
 - C. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source.
 - D. Location of unloading and transporting operations with pollution control equipment.
 - E. A detailed description of the best management practices utilized to achieve compliance with this Subpart, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized.

- F. Estimated frequency of application of dust suppressants by location of materials.
- G. Such other information as may be necessary to facilitate the Agency's review of the operating program.

iii. The operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with this 35 IAC 212.310 and shall be submitted to the Agency for its review, pursuant to 35 IAC 212.312.

7.2.6 Production and Emission Limitations

- a. i. PM emissions from the affected slag handling units and the affected slag processing units of Section 7.1 in total shall not exceed the following limits:

<u>(Lbs/Ton)</u>	<u>(Lbs/Hour)</u>	<u>(Tons/Year)</u>	<u>Annual Operating Hours</u>
0.0097	2.42	2.9	2400

These limits are based on the calculations presented in the Construction permit application.

- ii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].
- iii. The above limitations were established in Permit 05080091, pursuant to PSD. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for PSD [T1].

7.2.7 Testing Requirements

- a. i. Upon written request by the Illinois EPA, the Permittee shall have the opacity determined from the affected slag processing units, during representative weather and operating conditions, determined by a qualified observer in accordance with USEPA Test Method 9, as further specified below, pursuant to Section 39.5(7)(d) of the Act. Such testing shall be conducted within 45 calendar days of the request or on the date agreed upon by the Illinois EPA, whichever is later.

- ii. The duration of opacity observations for each test shall be at least 30 minutes (five 6-minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent.
- iii. A. The Permittee shall notify the Illinois EPA at least 7 days in advance of the date and time of these tests, in order to allow the Illinois EPA to witness testing. This notification shall include the name and employer of the qualified observer(s).
- B. The Permittee shall promptly notify the Illinois EPA of any changes in the time or date for testing.
- iv. The Permittee shall provide a copy of its observer's readings to the Illinois EPA at the time of testing, if Illinois EPA personnel are present.
- v. The Permittee shall submit a written report for this testing within 15 days of the date of testing. This report shall include:
 - A. Date and time of testing.
 - B. Name and employer of qualified observer.
 - C. Copy of current certification.
 - D. Description of observation condition, including recent weather.
 - E. Description of the operating conditions of the affected operations.
 - F. Raw data.
 - G. Opacity determinations.
 - H. Conclusions.

7.2.8 Monitoring Requirements

- a. i. If an affected slag handling units is routinely operated or exercised to confirm that the affected slag processing unit(s) will operate when needed, the operation and opacity of the affected slag handling units shall be formally observed by operating personnel for the affected slag handling units or a member of source owner or operator's environmental staff on a regular basis to assure that the affected

slag handling units is operating properly, which observations shall be made at least every six months.

- ii. If an affected slag handling units is not routinely operated or exercised, i.e., the time interval between operation of an affected slag handling units is typically greater than six months, the operation and opacity of the affected slag handling units shall be formally observed as provided above each time the source owner or operator carries out a scheduled exercise of the affected slag handling units.
- iii. The source owner or operator shall also conduct formal observations of operation and opacity of an affected slag handling units upon written request by the Illinois EPA. With the agreement of the Illinois EPA, the source owner or operator may schedule these observations to take place during periods when it would otherwise be operating the affected slag handling units.

Note: The formal observation required above is not intended to be a USEPA Test Method 9 opacity test, nor does the observation require a USEPA Test Method 9 certified observer. It is intended to be performed by personnel familiar with the operation of the affected slag handling units who would be able to make a determination based from the observed opacity as to whether or not the affected slag handling units was running properly, and subsequently initiate a corrective action if necessary.

- b. The Permittee shall perform inspections of the affected slag handling units on at least a monthly basis, including associated control measures, while the affected slag handling units are in use, to confirm compliance with the requirements of Condition 7.2.3, 7.2.5, and 7.2.6(a). These inspections may be scheduled so that only a number of affected operations are reviewed during each inspection, provided however, that all affected operations shall be inspected at least once during each calendar quarter, pursuant to Section 39.5(7)(a) of the Act.
- c. The Permittee shall perform detailed inspections of any dust collection equipment for the affected slag handling units. At least every 15 months, while the processes are out of service, perform an initial inspection before any maintenance and repair activities are conducted as well as a follow-up inspection performed after any such activities are completed, pursuant to Sections 39.5(7)(a) and (d) of the Act.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected slag handling units to demonstrate compliance with Conditions 5.6.1, 7.2.5, and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a.
 - i. PM emissions with supporting calculations based from the record keeping as required by this condition.
 - ii. Information identifying any deviation from Condition 7.2.3, 7.2.5, or 7.2.6.
 - iii. A file containing the particulate matter emission factors for the affected slag handling units and affected open areas (lb/ton) used by the Permittee to calculate emissions, with supporting documentation.
 - iv. A file containing the most current Operating Program for the affected slag handling units, with supporting documentation.
 - v. Date and utilization records for the water spray or surfactant solution application pursuant to Condition 7.2.5(c).
- b.
 - i. Information for the testing conducted pursuant to Condition 7.2.7, which shall at a minimum include the formal report for the measurements with date, time, personnel, the operating condition, and copies of the raw data sheets for the measurements.
- c. Recordkeeping pursuant to 35 IAC 212.316(g):
 - i. The owner or operator of any fugitive particulate matter emission unit shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of this Section and shall submit to the Agency an annual report containing a summary of such information.
 - ii. The records required under this subsection shall include at least the following:
 - A. The name and address of the source.
 - B. The name and address of the owner and/or operator of the source.
 - C. A map or diagram showing the location of all emission units controlled, including the location, identification, length, and width of roadways.

- D. For each application of water or chemical solution to roadways by truck: the name and location of the roadway controlled, application rate of each truck, frequency of each application, width of each application, identification of each truck used, total quantity of water or chemical used for each application and, for each application of chemical solution, the concentration and identity of the chemical.
 - E. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent and, if diluted, percent of concentration, used each day.
 - F. A log recording incidents when control measures were not used and a statement of explanation.
- iii. Copies of all records required by this Condition shall be submitted to the Agency within ten (10) working days after a written request by the Agency and shall be transmitted to the Agency by a company-designated person with authority to release such records.
 - iv. The records required under this Condition shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Agency representatives during working hours.
- d. The Permittee shall keep the following file(s) and log(s):
 - i. File(s) containing the following information for the affected slag processing units, with supporting information, which shall be kept up to date:
 - A. Information related to the dust collection equipment associated with the affected operations, including design control efficiency or performance specifications and maximum design particulate matter emissions, gr/dscf.
 - ii. Maintenance and repair log(s) for the air pollution control equipment associated with the affected slag processing units, including dust suppressant application systems, which log(s) shall list the activities performed on each item of equipment or system, with date and description.
- e. The Permittee shall maintain records of the following for the inspections required by Condition 7.2.8:

- i. For the inspections required by Condition 7.2.8(b) for each affected slag processing units:
 - A. Date and time the inspection was performed and name(s) of inspection personnel.
 - B. The observed condition of the control measures for each affected slag processing units, including the presence of any visible emissions.
 - C. A description of any maintenance or repair associated with established control measures that is recommended as a result of the inspection and a review of outstanding recommendations for maintenance or repair from previous inspection(s), i.e., whether recommended action has been taken, is yet to be performed or no longer appears to be required.
 - D. A summary of the observed implementation or status of actual control measures, as compared to the established control measures.
- ii. For the inspections required by Condition 7.2.8(c) for the dust collection equipment for affected operations:
 - A. Date and time the inspection was performed and name(s) of inspection personnel.
 - B. The observed condition of the equipment.
 - C. A summary of the maintenance and repair that is to be or was conducted on the equipment.
 - D. A description of any maintenance or repair that is recommended as a result of the inspection and a review of outstanding recommendations for maintenance or repair from previous inspection(s), i.e., whether recommended action has been taken, is yet to be performed or no longer appears to be required.
 - E. A summary of the observed condition of the equipment as related to its ability to reliably and effectively control emissions.
- f. The Permittee shall maintain records of the following for each incident when any affected slag handling units operated without the established control measures:
 - i. The date of the incident and identification of the affected slag handling units that were involved.

- ii. A description of the incident, including the established control measures that were not present or implemented; the established control measures that were present, if any; other control measures or mitigation measures that were implemented, if any; and the magnitude of the PM emissions during the incident.
- iii. The time at and means by which the incident was identified, e.g., scheduled inspection or observation by operating personnel.
- iv. The length of time after the incident was identified that the affected operations continued to operate before established control measures were in place or the operations were shutdown (to resume operation only after established control measures were in place) and, if this time was more than one hour, an explanation why this time was not shorter, including a description of any mitigation measures that were implemented during the incident.
- v. The estimated total duration of the incident, i.e., the total length of time that the affected operations ran without established control measures and the estimated amount of coal handled during the incident.
- vi. A discussion of the probable cause of the incident and any preventative measures taken.
- vii. A discussion whether Condition 7.2.3(b) may have been violated during the incident, with supporting explanation as needed.

7.2.10 Reporting Requirements

a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected slag handling units with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- i. Emissions of PM from the affected slag handling units in excess of the limits specified in Conditions 7.2.3 or 7.2.6 within 30 days of such occurrence.
- ii. Operation of the affected slag handling units in excess of the limits specified in Condition 7.2.6 within 30 days of such occurrence.

- iii. Failure to utilize water sprays or surfactant solution application as required by 7.2.5(d) or follow the particulate matter Operating Program as required by 7.2.5(f) within 30 days of such occurrence.
 - b.
 - i. The owner or operator of any fugitive particulate matter emission unit subject to 35 IAC Subpart K shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of this 35 IAC Subpart K and shall submit to the Agency an annual report containing a summary of such information, pursuant to 35 IAC 212.316(g)(1).
 - ii. A quarterly report shall be submitted to the Agency stating the following: the dates any necessary control measures were not implemented, a listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of this Section. This report shall be submitted to the Agency thirty (30) calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31, pursuant to 35 IAC 212.316(g)(5).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected slag handling units.

7.2.12 Compliance Procedures

- a. Compliance with the PM emission limitations of Conditions 7.2.3(b)-(d) is addressed by the requirements of Condition 7.2.5, the testing requirements in Condition 7.2.7, the records required in Condition 7.2.9, and the reports required in Condition 7.2.10(a).
- b. Compliance with Condition 7.2.5(d) is addressed by the records and reports required in Conditions 7.2.9(a) and 7.2.10(a).
- c. Compliance with the emission limits in Conditions 5.6 and 7.2.6(a) is addressed by the records and reports required in Conditions 7.2.9 and 7.2.10(a) and the emission factors and formulas listed below:

- i. Emission factors for the affected slag processing units:

PM Emission Factors	
<u>Pollutant</u>	<u>(lb/ton)</u>
Conveyor/Transfer Points	0.00014

The emission factors (lb/ton) are from AP-42 Section 11.19.2, table 11.19.2-2 (dated 08/04).

Note: The emission factors provided above already take account the effects of control by wet suppression, therefore no further emission control credit is warranted.

- ii. Emission formula for the affected slag processing units:

(PM Emissions, ton) = [(The Appropriate Emission Factor, lb/ton) x (Throughput, tons/month and tons/year)]/2000lb/ton

7.3 Fugitive Particulate Matter (PM) Emissions

7.3.1 Description

The facility generates fugitive particulate matter (PM) emissions from storage piles and truck movement over unpaved roadways.

Note: This narrative description is for informational purposes only and is not enforceable.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Fugitive PM Emissions	Fugitive PM Emissions From: - Equipment Traffic - Storage Piles - Wind Erosion	N/A	Water Truck Water Cannon Water Cannon

7.3.3 Applicable Provisions and Regulations

- a. The "affected fugitive PM sources" for the purpose of these unit-specific conditions, are fugitive PM sources described in Conditions 7.3.1 and 7.3.2.
- b. Pursuant to 35 IAC 212.301, 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.
- c. Pursuant to 35 IAC 212.316:
 - i. No person shall cause or allow fugitive particulate matter emissions from any storage pile to exceed an opacity of 10 percent, to be measured four ft from the pile surface [35 IAC 212.316(d)].
 - ii. No person shall cause or allow fugitive particulate matter emissions from any roadway or parking area located at a slag processing facility or integrated iron and steel manufacturing plant to exceed an opacity of 5 percent [35 IAC 212.316(e)(1)].

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected slag processing units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected fugitive PM

sources do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.3.5 Control Requirements and Work Practices

- a. The Permittee shall follow good operating practices for the affected fugitive PM sources, including periodic inspection, routine maintenance and prompt repair of defects.
- b. The Permittee shall implement an operating program for the affected fugitive PM sources that reflects good air pollution practices to minimize emissions of particulate matter from the affected units.
- c. Pursuant to 35 IAC 212.304:
 - i. All storage piles of materials with uncontrolled emissions of fugitive particulate matter in excess of 45.4 Mg per year (50 T/yr) which are located within a source whose potential particulate emissions from all emission units exceed 90.8 Mg/yr (100 T/yr) shall be protected by a cover or sprayed with a surfactant solution or water on a regular basis, as needed, or treated by an equivalent method, in accordance with the operating program required by Condition 7.3.5(e), pursuant to 35 IAC 212.304(a).
 - ii. 35 IAC 212.304(a) shall not apply to a specific storage pile if the owner or operator of that pile proves to the Agency that fugitive particulate emissions from that pile do not cross the property line either by direct wind action or reentrainment, pursuant to 35 IAC 212.304(b).
- d. Pursuant to 35 IAC 212.306, all normal traffic pattern access areas surrounding storage piles specified in Condition 7.3.5(c) and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by Condition 7.3.5(e).
- e.
 - i. The affected fugitive PM sources shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 IAC 212.310 and 212.312, and prepared by the owner or operator and submitted to the Agency for its review. Such operating program shall be designed to

significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a).

- ii. Minimum Operating Program: As a minimum the operating program shall include the following, pursuant to 35 IAC 212.310:
 - A. The name and address of the source.
 - B. The name and address of the owner or operator responsible for execution of the operating program.
 - C. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source.
 - D. Location of unloading and transporting operations with pollution control equipment.
 - E. A detailed description of the best management practices utilized to achieve compliance with this Subpart, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized.
 - F. Estimated frequency of application of dust suppressants by location of materials.
 - G. Such other information as may be necessary to facilitate the Agency's review of the operating program.
- iii. The operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with this 35 IAC 212.310 and shall be submitted to the Agency for its review, pursuant to 35 IAC 212.312.

7.3.6 Production and Emission Limitations

- a. i. Emissions of particulate matter from road traffic, i.e., fugitive road dust shall not exceed 3.07 tons/year. Compliance with this limitation shall be calculated using AP 42 emission factors for unpaved and paved roads, Sections 13.2.1 and 13.2.2, 5th ed.

- ii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].
- iii. The above limitations were established in Permit 05080091, pursuant to PSD. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for PSD [T1].

7.3.7 Testing Requirements

- a. i. Upon written request by the Illinois EPA, the Permittee shall have the opacity determined from the affected fugitive PM sources, during representative weather and operating conditions, determined by a qualified observer in accordance with USEPA Test Method 9, as further specified below, pursuant to Section 39.5(7)(d) of the Act. Such testing shall be conducted within 45 calendar days of the request or on the date agreed upon by the Illinois EPA, whichever is later.
- ii. The duration of opacity observations for each test shall be at least 30 minutes (five 6-minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent.
- iii. A. The Permittee shall notify the Illinois EPA at least 7 days in advance of the date and time of these tests, in order to allow the Illinois EPA to witness testing. This notification shall include the name and employer of the qualified observer(s).
- B. The Permittee shall promptly notify the Illinois EPA of any changes in the time or date for testing.
- iv. The Permittee shall provide a copy of its observer's readings to the Illinois EPA at the time of testing, if Illinois EPA personnel are present.
- v. The Permittee shall submit a written report for this testing within 15 days of the date of testing. This report shall include:
 - A. Date and time of testing.
 - B. Name and employer of qualified observer.

- C. Copy of current certification.
- D. Description of observation condition, including recent weather.
- E. Description of the operating conditions of the affected operations.
- F. Raw data.
- G. Opacity determinations.
- H. Conclusions.

7.3.8 Monitoring Requirements

- a. The Permittee shall perform inspections of the affected fugitive PM sources on at least a monthly basis, including associated control measures, while the affected slag handling units are in use, to confirm compliance with the requirements of Condition 7.2.3, 7.2.5, and 7.2.6(a). These inspections may be scheduled so that only a number of affected operations are reviewed during each inspection, provided however, that all affected fugitive PM sources shall be inspected at least once during each calendar quarter, pursuant to Section 39.5(7)(a) of the Act.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected fugitive PM sources to demonstrate compliance with Conditions 5.6.1, 7.3.3, 7.3.5, and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a.
 - i. PM emissions with supporting calculations based from the record keeping as required by this condition.
 - ii. Information identifying any deviation from Condition 7.3.3, 7.3.5, or 7.3.6.
 - iii. A file containing the particulate matter emission factors for the affected fugitive PM sources and affected open areas used by the Permittee to calculate emissions, with supporting documentation.
 - iv. A file containing the most current Operating Program for the affected fugitive PM sources, with supporting documentation.
 - v. Date and utilization records for the water spray or surfactant solution application pursuant to Condition 7.3.5(c) or (d).

- vi. Data required to determine the appropriate PM emission factor for vehicle travel on paved and unpaved roads, as determined from the most recent version of AP-42 Sections 13.2.1 (Paved Roads) and 13.2.2 (Unpaved Roads), as required for Condition 7.3.6(a) and 7.3.12(c).
 - A. Vehicle miles traveled, miles per year.
 - B. Surface material silt content, % and (grams per square meter) (g/m²).
 - C. Mean vehicle weight, tons.
 - D. Surface material moisture content, %.
 - E. Mean vehicle speed, mph.
 - F. Emission factor for 1980's vehicle fleet exhaust, brake wear and tire wear.
 - G. Particle size multiplier for particle size range and units of interest.
 - H. Other such information required by those AP42 sections needed to determine the emission factors.
 - I. A record of the emission factors developed.
- b. i. Information for the testing conducted pursuant to Condition 7.3.7, which shall at a minimum include the formal report for the measurements with date, time, personnel, the operating condition, and copies of the raw data sheets for the measurements.
- c. Recordkeeping pursuant to 35 IAC 212.316(g):
 - i. The owner or operator of any fugitive particulate matter emission unit shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of this Section and shall submit to the Agency an annual report containing a summary of such information.
 - ii. The records required under this subsection shall include at least the following:
 - A. The name and address of the source.
 - B. The name and address of the owner and/or operator of the source.

- C. A map or diagram showing the location of all emission units controlled, including the location, identification, length, and width of roadways.
 - D. For each application of water or chemical solution to roadways by truck: the name and location of the roadway controlled, application rate of each truck, frequency of each application, width of each application, identification of each truck used, total quantity of water or chemical used for each application and, for each application of chemical solution, the concentration and identity of the chemical.
 - E. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent and, if diluted, percent of concentration, used each day.
 - F. A log recording incidents when control measures were not used and a statement of explanation.
- iii. Copies of all records required by this Condition shall be submitted to the Agency within ten (10) working days after a written request by the Agency and shall be transmitted to the Agency by a company-designated person with authority to release such records.
 - iv. The records required under this Condition shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Agency representatives during working hours.
- d. The Permittee shall keep the following file(s) and log(s):
 - i. File(s) containing the following information for the affected fugitive PM sources, with supporting information, which shall be kept up to date:
 - A. Information related to the dust collection equipment associated with the affected fugitive PM sources, including design control efficiency or performance specifications and maximum design particulate matter emissions, gr/dscf.
 - ii. Maintenance and repair log(s) for the air pollution control equipment associated with the affected slag processing units, including dust suppressant application systems, which log(s) shall list the

activities performed on each item of equipment or system, with date and description.

- e. The Permittee shall maintain records of the following for the inspections required by Condition 7.3.8:
 - i. For the inspections required by Condition 7.3.8(a) for each affected fugitive PM sources:
 - A. Date and time the inspection was performed and name(s) of inspection personnel.
 - B. The observed condition of the control measures for each affected fugitive PM sources, including the presence of any visible emissions.
 - C. A description of any maintenance or repair associated with established control measures that is recommended as a result of the inspection and a review of outstanding recommendations for maintenance or repair from previous inspection(s), i.e., whether recommended action has been taken, is yet to be performed or no longer appears to be required.
 - D. A summary of the observed implementation or status of actual control measures, as compared to the established control measures.
- f. The Permittee shall maintain records of the following for each incident when any affected fugitive PM sources operated without the established control measures:
 - i. The date of the incident and identification of the affected slag handling units that were involved.
 - ii. A description of the incident, including the established control measures that were not present or implemented; the established control measures that were present, if any; other control measures or mitigation measures that were implemented, if any; and the magnitude of the PM emissions during the incident.
 - iii. The time at and means by which the incident was identified, e.g., scheduled inspection or observation by operating personnel.
 - iv. The length of time after the incident was identified that the affected fugitive PM sources continued to operate before established control measures were in place or the fugitive PM sources were shutdown (to resume operation only after established control

measures were in place) and, if this time was more than one hour, an explanation why this time was not shorter, including a description of any mitigation measures that were implemented during the incident.

- v. The estimated total duration of the incident, i.e., the total length of time that the affected fugitive PM sources ran without established control measures and the estimated amount of coal handled during the incident.
- vi. A discussion of the probable cause of the incident and any preventative measures taken.
- vii. A discussion whether Condition 7.3.3(c) may have been violated during the incident, with supporting explanation as needed.

7.3.10 Reporting Requirements

a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected fugitive PM sources with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- i. Emissions of PM from the affected slag handling units in excess of the limits specified in Conditions 7.3.3 or 7.3.6 within 30 days of such occurrence.
 - ii. Operation of the affected fugitive PM sources in excess of the limits specified in Condition 7.3.6 within 30 days of such occurrence.
 - iii. Failure to utilize water sprays or surfactant solution application as required by 7.2.5(c) or (d) or follow the particulate matter Operating Program as required by 7.3.5(e).
- b. i. The owner or operator of any fugitive particulate matter emission unit subject to 35 IAC Subpart K shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of this 35 IAC Subpart K and shall submit to the Agency an annual report containing a summary of such information, pursuant to 35 IAC 212.316(g)(1).
- ii. A quarterly report shall be submitted to the Agency stating the following: the dates any necessary control measures were not implemented, a listing of

those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of this Section. This report shall be submitted to the Agency thirty (30) calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31, pursuant to 35 IAC 212.316(g)(5).

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected fugitive PM sources.

7.3.12 Compliance Procedures

- a. Compliance with the PM emission limitations of Conditions 7.3.3(b)-(c) is addressed by the requirements of Condition 7.3.5, the testing requirements in Condition 7.3.7, the records required in Condition 7.3.9, and the reports required in Condition 7.3.10(a).
- b. Compliance with Condition 7.3.5(c)-(d) is addressed by the records and reports required in Conditions 7.3.9(a) and 7.3.10(a).
- c. Compliance with the emission limits in Conditions 5.6 and 7.3.6(a) is addressed by the records and reports required in Conditions 7.3.9 and 7.3.10(a) and the emission factors and formulas listed below:

- i. Emission factors for the affected fugitive PM sources:

PM Emission Factors	
<u>Type</u>	<u>(lb/VMT)</u>
Road Traffic:	
Paved Roads	*
Unpaved Roads	*

* The emission factors for pound per vehicle mile traveled (lb/VMT) is determined from the most recent version of AP-42 Sections 13.2.1 (Paved Roads) and 13.2.2 (Unpaved Roads).

- ii. Emission formula for the affected fugitive PM sources:

(PM Emissions, ton) = [(The Appropriate Emission
Factor, lb/ VMT) x (Vehicle Mile Traveled,
VMT/year)]/2000lb/ton

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements 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 Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after November 10, 2008 (the date of issuance of the proposed permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test

methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other 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 any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA

every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

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

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The

test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

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

8.6.4 Reporting Addresses

- a. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

- i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
P.O. Box 19276
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

iv. USEPA Region 5 - Air Branch

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

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

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

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 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.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

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

practices, or operations regulated or required under this permit;

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

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence [Section 39.5(7)(k) of the Act]:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

- ii. The permitted source was at the time being properly operated;
- iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed

description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations [Section 39.5(7)(k)(iv) of the Act].

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, 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 Permittee for a permit modification, revocation and reissuance, or 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].

9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

- d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of the permit, other portions of the 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 Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

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 this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

10.0 ATTACHMENTS

Attachment 1 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

- a. 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 particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

where:

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

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

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

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

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

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

Metric		English	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>T/hr</u>	<u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.2	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

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

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

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

where:

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

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

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

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

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

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

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

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf

www.epa.state.il.us/air/permits/197-fee.pdf

RWC:jws