

DRAFT/PROPOSED CAAPP PERMIT
November 20, 2012

Attention: David Long, Environmental Manager

Sterling Steel Company, LLC
101 Avenue K
Sterling, Illinois 61081

State of Illinois

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

[Title I and Title V Permit]

Source:

Sterling Steel Company, LLC
101 Avenue K
Sterling, Illinois 61081

I.D. No.: 195818AAI
Permit No.: 96010019

Permitting Authority:

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

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Type of Application: Renewal

Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 195818AAI

Permit No.: 96010019

Statement of Basis No.: 96010019-2012/06

Date Application Received: November 26, 2007

Date Issued: TBD

Expiration Date: TBD

Renewal Submittal Date: 9 Months Prior to expiration date

Source Name: Sterling Steel Company, LLC

Address: 101 Avenue K

City: Sterling

County: Whiteside

ZIP Code: 61081

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

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/785-1705.

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

ECB:MTR:AB:

cc: IEPA, Permit Section
IEPA, FOS, Region 2

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Section 1 - Source Information

1. AddressesSource

Sterling Steel Company, LLC
101 Avenue K
Sterling, Illinois 61081

Owner

Sterling Steel Company, LLC
101 Avenue K
Sterling, Illinois 61081

Operator

Sterling Steel Company, LLC
101 Avenue K
Sterling, Illinois 61081

Permittee

The Owner and Operator of the source as identified in this table.

2. ContactsCertified Officials

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

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Andrew R. Moore	President
<i>Delegated Authority</i>	No other individuals have been authorized by the IEPA.	N/A

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	David Long	815/622-7251	dlong@sscllc.com
<i>Technical Contact</i>	David Long	815/622-7251	dlong@sscllc.com
<i>Correspondence</i>	David Long	815/622-7251	dlong@sscllc.com
<i>Billing</i>	David Long	815/622-7251	dlong@sscllc.com

3. Single Source

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

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
195050AHN	03020055	Stein Steel Mill Services, Inc 610 Wallace Street Sterling, Illinois 61081

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Section 2 - General Permit Requirements

1. Prohibitions

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

2. Emergency Provisions

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

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

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- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

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

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

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

c. Duty to Maintain Equipment

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7)(a) of the Act]

d. Disposal Operations

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

e. Duty to Pay Fees

- i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

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

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

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
 - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
 - B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.
 - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

4. Testing

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- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]
- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator: The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

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

b. Retention of Records

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

c. Availability of Records

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format

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(e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.

- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

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

b. Certification by a Responsible Official

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

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after

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- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

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

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

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Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.

- ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

9. Reopening and Revising Permit

a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

b. Reopening and Revision

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

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

c. Inaccurate Application

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

d. Duty to Provide Information

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

10. Emissions Trading Programs

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

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11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(1) and (o) of the Act]
- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

13. Startup, Shutdown, and Malfunction

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

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Section 3 - Source Requirements

1. Applicable Requirements

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

a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.
- ii. Compliance Method (Fugitive Particulate Matter)

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

b. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

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

c. Asbestos Demolition and Renovation

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- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or demolish pursuant to Condition 3.1(c)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.
- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

d. Future Emission Standards

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

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

a. Fugitive PM Operating Program

Should this source become subject to 35 IAC 212.302, the Permittee shall prepare and operate under a Fugitive PM Operating Program consistent with 35 IAC 212.310 and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). Any future Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the Fugitive PM Operating Program is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Fugitive PM Operating Program. In the event that the IEPA notifies the Permittee of a deficiency with any Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

b. Episode Action Plan

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.

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- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on July 15, 2004, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO₂, PM₁₀, NO₂, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

c. Risk Management Plan (RMP)

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

d. Scrap Pollution Prevention Plan

- i. Pursuant to 40 CFR 63.10685(a)(1), for the production of steel at the Electric Arc Furnace (EAF) steelmaking facilities, the Permittee shall operate in accordance with the scrap pollution prevention plan by restricting the use of certain scrap and minimizing the amount of specified contaminants in such scrap.
- ii. The Scrap Pollution Prevention Plan, as submitted by the Permittee on June 30, 2008, is incorporated herein by reference. The document constitutes the formal Scrap Pollution Prevention Plan required by 40 CFR 63.10685(a)(1), addressing the specifications of scrap materials, procedures for verifying compliance with the specifications, procedures for taking corrective actions against vendors no comply with specifications, inspection, training and outreach materials used for implementation of this Plan.
- iii. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Pollution Prevention Plan, any amendments or revisions to this Plan, and the Permittee shall also keep a record of activities completed according to the Pollution Prevention Plan.

3. Title I Requirements

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

4. Synthetic Minor Limits

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

5. Reporting Requirements

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

a. Prompt Reporting

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

b. Semiannual Reporting

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

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

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

c. Annual Emissions Reporting

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

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Section 4 - Emission Unit Requirements

4.1 Electric Arc Furnace (EAF)

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
EAF #8	PM, SO ₂ , VOM, CO, NO _x , lead	2000	None	Baghouse, Direct Shell Evacuation	None

2. Applicable Requirements

For the emission units in Condition 4.1(1) above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

- A. Pursuant to 40 CFR 60.272a(a)(2), no owner or operator shall cause to be discharged into the atmosphere from an electric arc furnace and associated control devices any gases exhibiting 3 percent opacity or greater.
- B. Pursuant to 40 CFR 60.272a(a)(3), no owner or operator shall cause to be discharged into the atmosphere from a shop and, due solely to operations of an electric arc furnace, any gases exhibiting 6 percent opacity or greater except shop opacity less than 20 percent may occur during charging periods and shop opacity less than 40 percent may occur during tapping periods.
- C. Pursuant to 40 CFR 63.10686(b)(2), no owner or operator shall cause to be discharged into the atmosphere from a shop and, due solely to operations of an electric arc furnace, any gases exhibiting 6 percent opacity or greater.
- D. 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.

ii. Compliance Method (Opacity Requirements)

Monitoring

- A. Pursuant to 40 CFR 60.273a(c), visible emissions observations from the control device shall be performed by a certified observer and conducted at least once per day for at least three 6-minute periods when the EAF is operating in the melting and refining period. All visible emissions observations shall be conducted in accordance with Method 9. If visible emissions occur from more than one point, the opacity shall be recorded for any points where visible emissions are observed.
- B. Pursuant to 40 CFR 60.273(a)(d), shop opacity observations shall be conducted at least once per day when the furnace is operating in the meltdown and refining period. Shop opacity shall be determined as the arithmetic average of 24 or more consecutive 15-second opacity observations of emissions from the shop taken in accordance with Method 9. Shop opacity shall be recorded for any point(s) where visible emissions are observed in proximity to the EAF.

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- C. Pursuant to Section 39.5(7)(d) of the Act, visible emissions observations from a baghouses shall be conducted separately during each mode of operation (normal, when all four fans are in operation, and with reduced air flow, when less than four fans are in operation) if EAF operates in such mode during testing. If the Permittee switches to another mode of operation during the day testing was conducted, then another visible emissions observations shall be conducted for this mode of operation during that day.
- D. Pursuant to 40 CFR 60.274a(d), the Permittee shall perform monthly operational inspections of the equipment that is important to the performance of the total capture system (i.e., pressure sensors, dampers, and damper switches). This inspection shall include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion). Any deficiencies shall be noted and proper maintenance performed.
- E. Pursuant to 40 CFR 60.274a(b), the Permittee shall check and record on a once-per-shift basis the control system fan motor amperes and duct damper position.

Recordkeeping

- F. Pursuant to 40 CFR 60.276a(g), the Permittee shall maintain records of all shop opacity observations made in accordance with 40 CFR 60.273a(d).
- G. Pursuant to 40 CFR 60.274(h)(1) through (3), during any performance test required under 40 CFR 60.8, and for any report thereof required by 40 CFR 276(a)(f), or to determine compliance with 40 CFR 60.272(a)(3), the owner or operator shall monitor the following information for all heats covered by the test:
 - I. Charge weights and materials, and tap weights and materials;
 - II. Heat times, including start and stop times, and a log of process operation, including periods of no operation during testing and the pressure inside an EAF when direct-shell evacuation control system is used;
 - III. Control device operation log; and
 - IV. Method 9 data.
- H. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of all control device opacity observations made in accordance with 40 CFR 60.273a(c) and under what mode of operation the opacity observation was performed.
- I. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of the time and duration when baghouse operates with a reduced air flow rates.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 40 CFR 60.272(a)(1), no owner or operator shall discharge into the atmosphere from a control device emissions of particulate matter in excess of 12 mg/dscm (0.0052 gr/dscf).
- B. Pursuant to 40 CFR 63.10686(b)(1), no owner or operator shall discharge into the atmosphere from a control device emissions of particulate matter in excess of 12 mg/dscm (0.0052 gr/dscf).

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- C. Pursuant to 40 CFR 63.10686(a), the Permittee shall operate and maintain a capture system that collects the emissions from EAF (including charging, melting, and tapping operations) and conveys the collected emissions to a control device for the removal of particulate matter.
- D. Pursuant to 35 IAC 212.448, total particulate matter emissions from the EAF including melting and refining, charging, tapping, slagging, electrode port leakage and ladle lancing shall not exceed the allowable emission rate specified by 35 IAC 212.321.
- E. Pursuant to construction permit 00020018, the Permittee shall not exceed the following limits [T1]:

PM Emissions (Tons/mo)	PM Emissions (Tons/yr)
24.0	234.3

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to construction permit 00020018, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- B. Pursuant to 40 CFR 60.274a(d), the Permittee shall perform monthly operational inspections of the equipment that is important to the performance of the total capture system (i.e., pressure sensors, dampers, and damper switches). This inspection shall include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion). Any deficiencies shall be noted and proper maintenance performed.
- C. Pursuant to 40 CFR 60.274a(b), the Permittee shall check and record on a once-per-shift basis the control system fan motor amperes and damper position.
- D. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the EAF is subject to 40 CFR Part 64 for PM. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Section 7.6 and Table 7.6.1 of this permit. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

Testing

- E. Pursuant to Section 39.5(7)(a) and (d) of the Act, within 36 months after issuance of this permit, the Permittee shall conduct a stack test for measuring filterable PM emissions from the baghouse by using Methods 5 or 5D for verifying compliance with PM emission standards/limits of Condition 4.1(2)(b)(i). Based on the margin of compliance of this test, a schedule of subsequent test(s) shall be developed by the Permittee and presented to the Illinois EPA Compliance Section and Field Regional Office within 90 days of such test evaluation. The scheduled subsequent test(s) shall be conducted with the following frequencies based in accordance with the most recent stack test results:

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- I. Margin is less than 25%: the Permittee shall perform a stack test within next 18 months of such evaluation;
 - II. Margin is between 25% and 50%: the Permittee shall perform a stack test within next 36 months of such evaluation;
 - IV. Margin is 50% or more: the Permittee shall perform a stack test within next 60 months of such evaluation.
- F. Pursuant to Section 39.5(7)(a) and (d) of the Act, the stack tests for measuring PM emissions shall be conducted separately during different modes of baghouse operation (normal, when all four fans are in operation, and with a reduced air flow, when less than four fans are in operation).

Recordkeeping

- G. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records for verifying PM emissions:
- I. Records of monthly operational inspections of the components of a capture system, with the dates, time and names of the individuals performed these inspections, any deficiencies discovered and proper maintenance performed.
 - II. Most recent results of PM stack tests performed and the schedule of subsequent tests.
 - III. Annual evaluations of margin of compliance derived from the most recently conducted PM stack tests.
 - IV. Monthly and annual PM emissions (ton/mo and ton/yr).
 - V. The Permittee shall keep records of the time and duration when baghouse operates with a reduced air flow rates.

c. i. Sulfur Dioxide Requirements (SO₂)

- A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm.
- B. Pursuant to construction permit 00020018, the Permittee shall not exceed the following limits [T1]:

SO ₂ Emissions (Tons/mo)	SO ₂ Emissions (Tons/yr)
53.0	530.0

ii. Compliance Method (SO₂ Requirements)

Monitoring

- A. Pursuant to construction permit 00020018, 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).

Testing

- B. Pursuant to Section 39.5(7)(a) and (d) of the Act, within 36 months after issuance of this permit, the Permittee shall conduct a stack test (using four fans operation) for measuring SO₂ emissions from the baghouse by using Method 6 for verifying compliance with SO₂ emission standards/limits of Condition 4.1(2)(c)(i). Based on the margin of compliance of this test, a schedule of subsequent test(s) shall be developed by the Permittee and presented to the Illinois EPA Compliance Section and Field Regional Office within 90 days of such test evaluation. The scheduled subsequent test(s)

shall be conducted with the following frequencies based in accordance with the most recent stack test results:

- I. Margin is less than 25%: the Permittee shall perform a stack test within next 18 months of such evaluation;
- II. Margin is between 25% and 50%: the Permittee shall perform a stack test within next 36 months of such evaluation;
- III. Margin is 50% or more: the Permittee shall perform a stack test within next 60 months of such evaluation.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records for verifying SO₂ emissions:
 - I. Most recent results of SO₂ stack tests performed and the schedule of subsequent tests.
 - II. SO₂ emission factors (lb/hr or lb/ton of steel produced) derived from the most recently conducted stack tests.
 - III. Margin of compliance derived from the most recently conducted SO₂ stack tests.
 - IV. Monthly and annual SO₂ emissions (ton/mo and ton/yr).

d. i. Volatile Organic Material Requirements (VOM)

- A. Pursuant to construction permit 00020018, the Permittee shall not exceed the following limits [T1]:

VOM Emissions (Tons/mo)	VOM Emissions (Tons/yr)
28.0	277.1

ii. Compliance Method (VOM Requirements)

Monitoring

- A. Pursuant to construction permit 00020018, 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).

Testing

- B. Pursuant to Section 39.5(7)(a) and (d) of the Act, within 36 months after issuance of this permit, the Permittee shall conduct a stack test (using four fan operations) for measuring VOM emissions from the baghouse by using Methods 25 or 25A for verifying compliance with VOM emission limits of Condition 4.1(2)(d)(i). Based on the margin of compliance of this test, a schedule of subsequent test(s) shall be developed by the Permittee and presented to the Illinois EPA Compliance Section and Field Regional Office within 90 days of such test evaluation. The scheduled subsequent test(s) shall be conducted with the following frequencies based in accordance with the most recent stack test results:
 - I. Margin is less than 25%: the Permittee shall perform a stack test within next 18 months of such evaluation;
 - II. Margin is between 25% and 50%: the Permittee shall perform a stack test within next 36 months of such evaluation;
 - III. Margin is 50% or more: the Permittee shall perform a stack test within next 60 months of such evaluation.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records for verifying VOM emissions:
 - I. Most recent results of VOM stack tests performed and the schedule of subsequent tests.
 - II. VOM emission factors (lb/hr or lb/ton of steel produced) derived from the most recently conducted stack tests.
 - III. Margin of compliance derived from the most recently conducted VOM stack tests.
 - IV. Monthly and annual VOM emissions (ton/mo and ton/yr).

e. i. Carbon Monoxide Requirements (CO)

- A. Pursuant to construction permit 00020018, the Permittee shall not exceed the following limits [T1]:

CO Emissions (Tons/mo)	CO Emissions (Tons/yr)
385.0	3,830.0

ii. Compliance Method (CO Requirements)

Monitoring

- A. Pursuant to construction permit 00020018, 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).

Testing

- B. Pursuant to Section 39.5(7)(a) and (d) of the Act, within 36 months after issuance of this permit, the Permittee shall conduct a stack test (using four fan operations) for measuring CO emissions from the baghouse by using Method 10 for verifying compliance with CO emission limits of Condition 4.1(2)(e)(i). Based on the margin of compliance of this test, a schedule of subsequent test(s) shall be developed by the Permittee and presented to the Illinois EPA Compliance Section and Field Regional Office within 90 days of such test evaluation. The scheduled subsequent test(s) shall be conducted with the following frequencies based in accordance with the most recent stack test results:
 - I. Margin is less than 25%: the Permittee shall perform a stack test within next 18 months of such evaluation;
 - II. Margin is between 25% and 50%: the Permittee shall perform a stack test within next 36 months of such evaluation;
 - III. Margin is 50% or more: the Permittee shall perform a stack test within next 60 months of such evaluation.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records for verifying CO emissions:
 - I. Most recent results of CO stack tests performed and the schedule of subsequent tests.
 - II. CO emission factors (lb/hr or lb/ton of steel produced) derived from the most recently conducted stack tests.

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- III. Margin of compliance derived from the most recently conducted CO stack tests.
- IV. Monthly and annual CO emissions (ton/mo and ton/yr).

f. i. Nitrogen Oxide Requirements (NO_x)

- A. Pursuant to construction permit 00020018, the Permittee shall not exceed the following limits [T1]:

NO _x Emissions (Tons/mo)	NO _x Emissions (Tons/yr)
60.0	595.0

ii. Compliance Method (NO_x Requirements)

Monitoring

- A. Pursuant to construction permit 00020018, 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).

Testing

- B. Pursuant to Section 39.5(7)(a) and (d) of the Act, within 36 months after issuance of this permit, the Permittee shall conduct a stack test (using four fan operations) for measuring NO_x emissions from the baghouse by using Method 7 for verifying compliance with NO_x emission limits of Condition 4.1(2)(f)(i). Based on the margin of compliance of this test, a schedule of subsequent test(s) shall be developed by the Permittee and presented to the Illinois EPA Compliance Section and Field Regional Office within 90 days of such test evaluation. The scheduled subsequent test(s) shall be conducted with the following frequencies based in accordance with the most recent stack test results:
 - I. Margin is less than 25%: the Permittee shall perform a stack test within next 18 months of such evaluation;
 - II. Margin is between 25% and 50%: the Permittee shall perform a stack test within next 36 months of such evaluation;
 - III. Margin is 50% or more: the Permittee shall perform a stack test within next 60 months of such evaluation.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records for verifying NO_x emissions:
 - I. Most recent results of NO_x stack tests performed and the schedule of subsequent tests.
 - II. NO_x emission factors (lb/hr or lb/ton of steel produced) derived from the most recently conducted stack tests.
 - III. Margin of compliance derived from the most recently conducted NO_x stack tests.
 - IV. Monthly and annual NO_x emissions (ton/mo and ton/yr).

g. i. Hazardous Air Pollutant Requirements (HAP - Lead)

- A. Pursuant to construction permit 00020018, the Permittee shall not exceed the following limits [T1]:

Lead Emissions	Lead Emissions

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(Tons/mo)	(Tons/yr)
0.41	4.08

ii. Compliance Method (HAP Requirements)

Monitoring

A. Pursuant to construction permit 00020018, 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).

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the monthly and annual lead emissions (ton/mo and ton/yr).

h. i. Operational and Production Requirements

A. Pursuant to construction permit 00020018, steel production of EAF shall not exceed 1,630,000 tons/yr [T1].

B. Pursuant to construction permit 00020018 and 40 CFR 60.11(a), the Permittee shall, to the extent practicable, maintain and operate the affected furnace, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.

ii. Compliance Method (Operational and Production Requirements)

Monitoring

A. Pursuant to construction permit 00020018, compliance with annual limits shall be determined from a running total of 12 months of data.

Recordkeeping

B. Pursuant to Section 39.5(7)(b), the Permittee shall keep monthly and annual records of EAF steel production (tons/mo and tons/yr).

i. i. Work Practice Requirements

A. Pursuant to 40 CFR 63.10685, the Permittee shall implement the requirements of the Pollution Prevention Plan for Scrap incorporated by reference into this permit in Condition 3.2(d) of this permit.

ii. Compliance Method (Work Practice Requirements)

See Condition 3.2(d) of this permit

3. Non-Applicability Determinations

- a. This permit is issued based on the EAF not being subject to 35 IAC 215.301, because its organic material emissions do not qualify as photochemically reactive material.
- b. For all regulated air pollutants other than PM, the EAF is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the EAF does not use an add-on control device to achieve compliance with an emission limitation or standard for air pollutants other than PM.

4. Other Requirements

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a. Startup, Shutdown and Malfunction Breakdown Requirements

i. Authorization for State Requirements

A. Malfunction Breakdown Requirements

Pursuant to 35 IAC 201.149, 201.161, and 201.262, the source is authorized to continue operation in violation of the applicable requirements of Conditions 4.1(2)(a)(i)(D), 4.1(2)(b)(i)(D) and 4.1(2)(c)(i)(A) during malfunction breakdown. The Permittee shall comply with all applicable requirements in Section 7.5 of this permit.

B. Shutdown Requirements

Pursuant to Section 39.5(7)(b) of the Act, the source shall comply with all applicable requirements in Section 7.4 of this permit during shutdown.

ii. Authorization for Federal Requirements

A. Pursuant to 40 CFR 60.11(c), the opacity standards set forth in 40 CFR Part 60 shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.

B. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate EAF including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

C. Pursuant to 40 CFR 60.7(b), the Permittee subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; and any malfunction of the air pollution control equipment.

D. *Startup, shutdown, and malfunction plan.* Pursuant to 40 CFR 63.6 (e) (3), the Permittee shall develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the EAF during periods of startup, shutdown, and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard. The startup, shutdown, and malfunction plan does not need to address any scenario that would not cause the source to exceed an applicable emission limitation in the relevant standard. This plan must be developed by the owner or operator by the source's compliance date for that relevant standard.

E. When actions taken by the owner or operator during a startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, the owner or operator must keep records for that event which demonstrate that the procedures specified in the plan were followed. These records may take the form of a "checklist," or other effective form of recordkeeping that confirms conformance with the startup, shutdown, and malfunction plan and describes the actions taken for that event. In addition, the owner or operator must keep records of these events as specified in 40 CFR 63.10(b), including records of the occurrence and

duration of each startup or shutdown (if the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), or malfunction of operation and each malfunction of the air pollution control and monitoring equipment. Furthermore, the owner or operator shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the affected source's startup, shutdown and malfunction plan in the semiannual (or more frequent) startup, shutdown, and malfunction report required in 40 CFR 63.10(d)(5).

- F. The owner or operator must maintain at the affected source a current startup, shutdown, and malfunction plan and must make the plan available upon request for inspection and copying by the Illinois EPA or USEPA. In addition, if the startup, shutdown, and malfunction plan is subsequently revised as provided in 40 CFR 63.10(e)(3)(viii), the owner or operator must maintain at the affected source each previous (i.e., superseded) version of the startup, shutdown, and malfunction plan, and must make each such previous version available for inspection and copying by the Illinois EPA or USEPA for a period of 5 years after revision of the plan. If at any time after adoption of a startup, shutdown, and malfunction plan the affected source ceases operation or is otherwise no longer subject to the provisions of 40 CFR Part 63, the owner or operator must retain a copy of the most recent plan for 5 years from the date the source ceases operation or is no longer subject to this part and must make the plan available upon request for inspection and copying by the Illinois EPA or USEPA. The Illinois EPA or USEPA may at any time request in writing that the owner or operator submit a copy of any startup, shutdown, and malfunction plan (or a portion thereof) which is maintained at the source or in the possession of the owner or operator. Upon receipt of such a request, the owner or operator must promptly submit a copy of the requested plan (or a portion thereof) to the Illinois EPA or USEPA. The owner or operator may elect to submit the required copy of any startup, shutdown, and malfunction plan to the Illinois EPA or USEPA in an electronic format.

b. Anticipated Operating Scenarios

- i. Pursuant to Construction Permit 05020083 issued for trial operation of the baghouse for EAF #8 and Section 39.5(7)(d), operation with reduced air flow, i.e., without all four fans, is not considered a malfunction for purposes of determining compliance with applicable federal or state emission standards and requirements.
- ii. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of the time and duration when baghouse operates with a reduced air flow rates.

5. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.1(2)(a)(i), (b)(i), (c)(i), (d)(i), (e)(i), (f)(i), (g)(i) and h(i).

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II. Requirements in Condition 4.1(2)(i)(i)) and 4.1(4)(a).

- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

b. Federal Reporting

- i. Pursuant to 40 CFR 60.276a(b), the Permittee shall submit a written report of exceedances of the control device opacity to the Illinois EPA semi-annually. For the purposes of these reports, exceedances are defined as all 6-minute periods during which the average opacity is 3 percent or greater.
- ii. Pursuant to 40 CFR 63.6(e), if an action taken by the owner or operator during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, and the source exceeds any applicable emission limitation in the relevant emission standard, then the owner or operator must record the actions taken for that event and must report such actions within 2 working days after commencing actions inconsistent with the plan, followed by a letter within 7 working days after the end of the event, in accordance with 40 CFR 63.10(d)(5) (unless the owner or operator makes alternative reporting arrangements, in advance, with the Illinois EPA or USEPA).
- iii. See also Section 7.5 for malfunction and breakdown reporting provisions established by this permit.

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4.2 EAF Dust Handling System

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
EAF Dust Handling System:					
• Silos	PM	2000	None	Bin Vents	None
• Truck Loading	PM	2000	None	None	None
• Pneumatic Transfer Lines	PM	2000	None	None	None

2. Applicable Requirements

For the emission units in Condition 4.2(1) above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

- A. Pursuant to 40 CFR 60.272a(b), the Permittee shall cause to be discharged into the atmosphere from the dust-handling system any gases with an opacity 10 percent or greater.
- 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.

ii. Compliance Method (Opacity Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform monthly inspections of all filters and devices important for dust handling system to ensure its proper operations.
- B. Pursuant to Section 39.5(7)(a) and (d) of the Act, opacity observations from the dust handling system shall be performed by a certified observer and conducted at least once per month when the dust handling system is operating during loading and unloading. Dust handling system opacity shall be determined in accordance with procedures established by Method 9.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of such inspections which include the date of the inspections and its results.

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D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of all dust handling system opacity observations performed by the source.

b. i. Particulate Matter Requirements (PM)

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

B. Pursuant to construction permit 00050081, the Permittee shall not exceed the following limits [T1]:

Equipment/Operation	PM Emissions	
	Lb/hr	Ton/year
EAF Dust Conveying	0.000055	0.00022
Truck Loading EAF Dust	0.25	0.55

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to construction permit 00050081, compliance with annual limits shall be determined from a running total of 12 months of data.
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform monthly inspections of all filters and devices important for dust handling system to ensure its proper operations.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of inspections which include the date of the inspections and its results.
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of PM emissions with supporting calculations, including material throughput.

c. i. Operational and Production Requirements

- A. Pursuant to construction permit 00050081, EAF dust handling system shall not exceed the following limits [T1]:
 - I. For dust conveying, dust throughput shall not exceed 11,000 lb/hour.
 - II. For truck dust loading, dust throughput shall not exceed 50,000 lb/hour and 4,380 hr/yr of operation.

ii. Compliance Method (Operational and Production Requirements)

Monitoring

- A. Pursuant to construction permit 00050081, compliance with annual limits shall be determined from a running total of 12 months of data.

Recordkeeping

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- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep actual hours of operation for dust conveying and truck dust loading (hr/mo and hr/yr).
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep dust throughput (lb/mo) and truck dust loading (lb/mo).

3. Non-Applicability Determinations

a. 40 CFR 64, Compliance Assurance Monitoring (CAM)

EAF dust handling system does not have potential pre-control device emissions of the applicable regulated air pollutants that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included for EAF dust handling system.

5. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.2(2)(a)(i) and (b)(i).
 - II. Requirements in Condition 4.2(2)(c)(i)).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

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4.3 Ladle Metallurgy Facility (LMF)

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
LMF Station #2	PM	1994	None	Baghouse 2 (LMB2)	None

2. Applicable Requirements

For the emission units in Condition 4.3(1) above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform monthly inspections of baghouse to ensure it proper operation and, if needed, conduct maintenance or replacement of the bags and/or other baghouse components.

B. Pursuant to Section 39.5(7)(a) and (d) of the Act, as part of the monthly inspections, opacity observations from baghouse stack(s) shall be conducted daily by using Method 9, as required by CAM Plan described in Table 7.6.2 of this permit.

Recordkeeping

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of such inspections which include the date of the inspections and its results.

D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of opacity readings performed at LMF.

b. i. Particulate Matter Requirements (PM)

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- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.321(c).
- B. Pursuant to construction permit 94110109, the Permittee shall not exceed the following limits [T1R]:

Equipment/Operation	PM Emissions	
	Lb/hr	Ton/year
LMF Station #2	4.14	6.43

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to construction permit 94110109, compliance with annual limits shall be determined from a running total of 12 months of data.
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform monthly inspections of baghouse to ensure it proper operation and, if needed, conduct maintenance or replacement of the bags and/or other baghouse components.
- C. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, LMF Station #2 is subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.6 and Table 7.6.2. At all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b). To ensure proper operation of a baghouse, daily opacity readings shall be conducted by using Method 9, as required by CAM Plan of Table 7.6.2 of this permit.

Recordkeeping

- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of monthly operational inspections of the baghouse components, with the dates, time and names of the individual performed these inspections, any deficiencies discovered and proper maintenance performed.
- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of hourly, monthly and annual PM emissions (lb/hr, ton/mo and ton/yr), with supporting calculations.

c. i. Operational and Production Requirements

- A. Pursuant to construction permit 941101109, LMF Station #2 shall not exceed the following limits [T1]:
 - I. Molten steel production rate: 525 ton/hr.
 - II. Maximum alloy addition to ladle (does not include alloys added to the ladle prior to the molten steel): 2.5 ton/hr.

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

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- A. Pursuant to Section 39.5(7)(b), the Permittee shall keep hourly records for tons of molten steel processed and tons of alloy addition to ladle.

3. Non-Applicability Determinations

- a. LMF Station #2 is not subject to 35 IAC 216.121, because it is not a fuel combustion emission unit.
- b. LMF Station #2 is not subject to 35 IAC 215.301, because its organic material emissions do not qualify as photochemically reactive material.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included for LMF Station.

5. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.3(2)(a)(i) and (b)(i).
 - II. Requirements in Condition 4.3(2)(c)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

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4.4 Casting Operations

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Billet Caster	PM	1981	None	None	None

2. Applicable Requirements

For the emission units in Condition 4.4(1) above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(a) and (d) of the Act, annual opacity observations shall be performed by a qualified observer in accordance with Method 9 for billet caster or caster's building openings while the caster is operating. The duration of opacity observations shall be at least 30 minutes unless no visible emissions are observed during the first 12 minutes of observations.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of opacity observations.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units

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for which construction or modification commenced on or after April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.321(c).

ii. Compliance Method (PM Requirements)

Recordkeeping

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

- I. Monthly PM emissions, with supporting calculations.
- II. Amount of steel processed (tons/hr).
- III. Records of the allowable PM emissions outlined by 35 IAC 212.321(c) based on the actual process weight rates of metal passing billet caster.

3. Non-Applicability Determinations

a. 40 CFR 64, Compliance Assurance Monitoring (CAM).

The billet caster does not subject to CFR 40 CFR, CAM, because it does not use an add-on control device to achieve compliance with any emission limitation or standard.

b. Billet caster is not subject to 35 IAC 216.121 because this emission unit is not a fuel combustion emission unit.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included for the billet caster.

5. Reporting Requirements

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

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.4(2)(a)(i) and (b)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

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- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

4.5 12" Mill Reheat Furnace

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
12" Mill Reheat Furnace	PM, NO _x , SO ₂ , CO, VOM	1984	None	None	None

2. Applicable Requirements

For the emission units in Condition 4.5 above, the Permittee shall comply with the following applicable requirements pursuant to 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

- a. **Opacity Requirements**
 - A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.
 - ii. **Compliance Method (Opacity Requirements)**
 - Monitoring**
 - A. Pursuant to Section 39.5(7)(a) and (d) of the Act, annual opacity observations shall be performed by a qualified observer in accordance with Method 9 for a reheat furnace stack or reheat furnace building openings while the furnace is operating. The duration of opacity observations shall be at least 30 minutes unless no visible emissions are observed during the first 12 minutes of observations.
 - Recordkeeping**
 - B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of opacity observations.
- b. **Particulate Matter Requirements (PM)**
 - A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any

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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, to exceed the allowable emission rates specified in 35 IAC 212.321(c).

ii. Compliance Method (PM Requirements)

A. Recordkeeping

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

- I. Monthly and annual emissions of PM (tons/month tons/year), with supporting calculations.
- II. Monthly and annual amounts of steel processed (tons/month and tons/year) based on the 30 day rolling average.
- III. Records of the allowable PM emissions outlined by 35 IAC 212.321(c) based on the actual process weight rates of metal passing reheat furnace.

c. i. Nitrogen Oxides Requirements (NO_x)

- A. Pursuant to permit 73020819, the Permittee shall not exceed the following limits [T1]:

NO _x Emissions	
Tons/month	Tons/year
21.4	214.62

ii. Compliance Method (NO_x Requirements)

A. Monitoring

Pursuant to permit 73020819, 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 of data.

B. Recordkeeping

Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to NO_x emissions:

- I. Monthly and annual emissions of NO_x (tons/month and tons/year), with supporting calculations.

d. i. Sulfur Dioxide Requirements (SO₂)

- A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm.

- B. Pursuant to permit 73020819, the Permittee shall not exceed the following limits [T1]:

SO ₂ Emissions	
Ton/month	Ton/year

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0.05	0.46
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ii. Compliance Method (SO₂ Requirements)

A. Monitoring

- I. Pursuant to permit 73020819, 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 of data.
- II. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall use pipeline quality natural gas with a certification from the natural gas supplier that the sulfur content in the supplied natural gas does not exceed 2000 ppm.

B. Recordkeeping

Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to SO₂ emissions:

- I. Monthly and annual emissions of SO₂ (tons/month and tons/year), with supporting calculations.
- II. Certification from the natural gas supplier.

e. i. Carbon Monoxide Requirements (CO)

- A. Pursuant to permit 73020819, the Permittee shall not exceed the following limits [T1]:

CO Emissions	
Ton/month	Ton/year
6.44	64.39

ii. Compliance Method (CO Requirements)

A. Monitoring

- I. Pursuant to permit 73020819, 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 of data.

B. Recordkeeping

Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to CO emissions:

- I. Monthly and annual emissions of CO (tons/month and tons/year), with supporting calculations.

f. i. Volatile Organic Material Requirements (VOM)

- A. I. Pursuant to permit 73020819, the Permittee shall not exceed the following limits [T1]:

VOM Emissions	
Ton/month	Ton/year

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0.42	4.22
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ii. Compliance Method (VOM Requirements)

A. Monitoring

I. Pursuant to permit 73020819, 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 of data.

B. Recordkeeping

Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to VOM emissions:

I. Monthly and annual emissions of VOM (tons/month and tons/year), with supporting calculations.

g. i. Operational or Production Requirements

A. Pursuant to permit 73020819, the Permittee shall not exceed the following limits [T1]:

Annual natural gas usage of the reheat furnace shall not exceed 1,533 million SCF.

ii. Compliance Method (Operational or Production Requirements)

A. Recordkeeping

I. Pursuant to Section 39.5(7)(b), the Permittee shall keep records of monthly and annual natural gas usage (million scf/mo and million scf/yr).

3. Work Practice Requirements

As of the date of issuance of this permit, there are no such requirements that need to be included for these emission units.

4. Non-Applicability Determinations

a. **40 CFR 64, Compliance Assurance Monitoring (CAM)**

Reheat furnace does not use an add-on control device to achieve compliance with any emission limitation or standard.

b. Reheat furnace is not subject to 35 IAC 216.121 because it is not a fuel combustion emission unit as defined in 35 IAC 211.2470.

5. Other Requirements

As of the date of issuance of this permit, there are no such requirements that need to be included for these emission units.

6. Reporting Requirements

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

i. Prompt Reporting

- A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements, unless a NESHAP or NSPS standard specifies a different time frame, as follows:

Requirements in Conditions 4.5(2)(a)(i), (b)(i), (c)(i), (d)(i), (e)(i), (f)(i) and (g)(i).

- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

- A. Date and time of the deviation.
- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

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4.6 Miscellaneous Process Emission Units

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Ladle Preheaters (7)	PM, SO ₂	Pre-1972	None	None	None
Tundish Dryers (2)	PM, SO ₂	1991	None	None	None
Weld Shop Oven	PM, SO ₂	1975	None	None	None
Torch Cutters	PM, SO ₂	Pre-1971	None	None	None
Caster Strand Cutters (8)	PM, SO ₂	1980	None	None	None

2. Applicable Requirements

For the emission units in Condition 4.6 above, the Permittee shall comply with the following applicable requirements pursuant to 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. Opacity Requirements

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.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(a) and (d) of the Act, annual opacity observations shall be performed by a qualified observer in accordance with Method 9 for each miscellaneous process emission unit or the building(s) housing this emission unit, as identified above, when such unit is operating. The duration of opacity observations shall be at least 30 minutes unless no visible emissions are observed during the first 12 minutes of observations.

Recordkeeping

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B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of opacity observations.

b. i. Particulate Matter Requirements (PM)

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

ii. Compliance Method (PM Requirements)

Recordkeeping

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

- I. Monthly and annual emissions of PM (tons/month tons/year), with supporting calculations.
- II. Monthly and annual amounts of materials processed (tons/month and tons/year) based on the 30 day rolling average.
- III. Records of the allowable PM emissions outlined by 35 IAC 212.321(c) based on the actual process weight rates of materials processed by each unit.

c. i. Sulfur Dioxide Requirements (SO₂)

A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm.

ii. Compliance Method (SO₂ Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(a) of the Act, for the units fired with natural gas, the Permittee shall use pipeline quality natural gas with a certification from the natural gas supplier that the sulfur content in the supplied natural gas does not exceed 2000 ppm.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to SO₂ emissions:

- I. Certification from the natural gas supplier.

3. Work Practice Requirements

As of the date of issuance of this permit, there are no such requirements that need to be included for these emission units.

4. Non-Applicability Determinations

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a. **40 CFR 64, Compliance Assurance Monitoring (CAM)**

Miscellaneous process emission units do not use an add-on control device to achieve compliance with any emission limitation or standard.

b. Miscellaneous process emission units are not subject to 35 IAC 216.121 because these emission units are not the fuel combustion emission units.

5. Other Requirements

As of the date of issuance of this permit, there are no such requirements that need to be included for these emission units.

6. Reporting Requirements

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

a. **Prompt Reporting**

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements, unless a NESHAP or NSPS standard specifies a different time frame, as follows:

I. Requirements in Conditions 4.6(2)(a)(i), (b)(i) and (c)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

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4.7 EAF Storage Silos and Material Handling Operations

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Silo Truck Loadout	PM	N/A	None	EAF #8 Baghouse	None
Lime Silos (DC-1, DC-2, DC-3)	PM	1982, 2002, 1996	None	Bin Vent Filters	None
Lime Silos (DC-5, DC-6, DC-7)	PM	2007	None	Bin Vent Filters	None
Carbon Silos (DC-8 and DC-9)	PM	1995	None	Bin Vent Filters	None
WWT Lime Silo (DC-4)	PM	1996	None	Bin Vent Filters	None

2. Applicable Requirements

For the emission units in Condition 4.7 above, the Permittee shall comply with the following applicable requirements pursuant to 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform monthly inspections of all filters and baghouses to ensure there proper operation.

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- B. Pursuant to Section 39.5(7)(a) and (d) of the Act, annual opacity observations shall be performed by a certified observer in accordance with Method 9 for each silo during loading and unloading operations of raw materials or by-products. The duration of opacity observations shall be at least 30 minutes unless no visible emissions are observed during the first 12 minutes of observations or duration of observation shall be equal to the time of a batch loaded/unloaded into or from the silo.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall keep records of inspections and associated maintenance log.
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of opacity observations.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.321(c).
- B. Pursuant to construction permits 89030072 and 96020029, the Permittee shall not exceed the following emission limits [T1]:

Item of Equipment	PM Emissions (Tons/Year)
Lime Silos (DC-1, DC-2, DC-3, DC-5, DC-6, DC-7)	0.144
Lime Silo (DC-4)	0.0012
Carbon Silos (DC-8, DC-9)	0.024

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to construction permits 89030072 and 96020029, 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 months total).

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to PM emissions:
 - I. Monthly and annual emissions of PM (tons/month and tons/year), with supporting calculations.
 - II. Records of the allowable PM emissions outlined by 35 IAC 212.321(c) based on the actual process weight rates loaded into each storage silo and processed by material handling.

c. i. Operational or Production Requirements

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- A. Pursuant to construction permits 89030072 and 96020029, the Permittee shall not exceed the following production limits [T1]:

Item of Equipment	Throughput (Tons/Year)
Lime Silo (DC-1)	30,000
Lime Silo (DC-2)	30,000
Lime Silo (DC-3)	2,000
Lime Silo (DC-4)	240
Lime Silo (DC-5)	15,000
Lime Silo (DC-6)	15,000
Lime Silo (DC-7)	20,000
Carbon Silo (DC-8)	10,000
Carbon Silo (DC-9)	10,000

- ii. Compliance Method (Operational or Production Requirements)

Monitoring

- A. Pursuant to construction permits 89030072 and 96020029, 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).

Recordkeeping

- B. Pursuant to Section 39.5(7)(a), the Permittee shall keep records of individual material throughput of each silo (tons/yr).

3. Work Practice Requirements

As of the date of issuance of this permit, there are no such requirements that need to be included for these emission units.

4. Non-Applicability Determinations

a. 40 CFR 64, Compliance Assurance Monitoring (CAM)

Each silo is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because it does not have potential pre-control device emissions of any applicable regulated air pollutant that equals or exceeds major source threshold levels.

5. Other Requirements

As of the date of issuance of this permit, there are no such requirements that need to be included for these emission units.

6. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements, unless a NESHAP or NSPS standard specifies a different time frame, as follows:

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- I. Requirements in Conditions 4.7(2)(a)(i), (b)(i) and (c)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.8 Cold Cleaning Degreasers

1. Emission Units and Operations					
Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Cold Cleaning Degreasers (15 stations total)	VOM	N/A	None	None	None

2. Applicable Requirements

For the emission units in Condition 4.8 above, the Permittee shall comply with the following applicable requirements pursuant to 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

- a. i. Volatile Organic Material Emissions (VOM)
 - A. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in Sections 215.302, 215.303, 215.304.
- ii. Compliance Method (Opacity Requirements)
 - Recordkeeping
 - A. Pursuant to Section 39.5(b) and (d) of the Act, the Permittee shall keep the following records:
 - I. Total VOM solvent usage (gal/mo and gal/yr) for all degreasers and separate individual usage for each degreaser (gal/mo and gal/yr).
 - II. Density of applied solvents (lb/gal).
 - III. Emissions of VOM (lb/hr and ton/yr) from each degreaser, with supporting calculations.

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3. Work Practice Requirements

- a. i. Pursuant to 35 IAC 215.182, the Permittee shall comply with the following requirements:
- A. Operating Procedures: No person shall operate a cold cleaning degreaser unless [35 IAC 215.182(a)]:
- I. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20 percent of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
- II. The cover of the degreaser is closed when parts are not being handled; and
- III. Parts are drained until dripping ceases.
- B. Equipment Requirements: No person shall operate a cold cleaning degreaser unless [35 IAC 215.182(b)]:
- I. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counterweights, or a powered system if:
- The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38 C (100 F);
 - The solvent is agitated; or
 - The solvent is heated above ambient room temperature.
- II. The degreaser is equipped with a facility for draining cleaned parts. The drainage facility shall be constructed so that parts are enclosed under the cover while draining unless:
- The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38 C (100 F): or
 - An internal drainage facility cannot be fitted into the cleaning system, in which case the drainage facility may be external.
- III. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38 C (100 F) or if the solvent is heated above 50 C (120 F) or its boiling point:
- A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
 - Any other equipment or system of equivalent emission control as approved by the Illinois EPA. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
- IV. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and

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- V. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.

- ii. Compliance Method (Work Practice Requirements)

- Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall conduct monthly inspections to ensure that each cold degreaser is equipped with closed cover and this cover is closed when the parts not being handled.
 - B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall conduct monthly inspections to ensure that containers used for waste solvents are equipped with a cover and this cover is closed when the solvents being stored.

- Recordkeeping

- C. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall keep records of the solvents being used including a vapor pressure of these solvents and their temperatures as they applied by the degreasers.
 - D. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall keep records of all inspections performed.

4. Non-Applicability Determinations

- a. Pursuant to 40 CFR 63.460(a), the degreasers not being subject to 40 CFR 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning, because the source does not operate any batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

- b. 40 CFR 64, Compliance Assurance Monitoring (CAM)

Cold degreasers do not use an add-on control device to achieve compliance with any emission limitation or standard.

5. Other Requirements

As of the date of issuance of this permit, there are no such requirements that need to be included for these emission units.

6. Reporting Requirements

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

- a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements, unless a NESHAP or NSPS standard specifies a different time frame, as follows:

- I. Requirements in Condition 4.8(2)(a)(i)

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II. Requirements in Condition 4.8(3)(a)(i)

- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.9 Gasoline Storage Tanks

1. Emission Units and Operations					
Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Tank #1 (300 gallons capacity)	VOM	1992	None	None	None
Tank #2 (1,000 gallons capacity)	VOM	1993	None	None	None
Tank #3 (300 gallons capacity)	VOM	1990	None	None	None

2. Applicable Requirements

For the emission unit in Condition 4.9 above, the Permittee shall comply with the following applicable requirements pursuant to 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

- a. i. Work Practice Requirements (State)
 - A. Pursuant to 35 IAC 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe, submerged fill or an equivalent device approved by the Agency according to the provisions of 35 Ill. Adm. Code 201.
- ii. Compliance Method (State Work Practice Requirements)
 - Monitoring
 - A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall conduct semi-annual inspections of the gasoline storage tank and dispensing operation while the tank is being filled by inspecting at least the following:
 - I. Retractors, hoses, breakaways, swivels.

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- II. Adapters, vapor caps, rubber gaskets, and spill containment buckets.
- III. Submerged loading pipe is physically present and the condition of the pipe for integrity.

Recordkeeping

B. Pursuant to Section 39.5(7)(a) and (d) of the Act, the Permittee shall maintain the records of conducted inspections, with a date and results of such inspections.

b. i. Work Practice Requirements (Federal)

A. Pursuant to 40 CFR 63.1116(a), the Permittee shall fulfill at least the following requirements in regards to the gasoline dispensing facility with monthly throughput of less than 10,000 gallons of gasoline:

- I. Minimize gasoline spills;
- II. Clean up spills as expeditiously as practicable;
- III. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
- IV. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

ii. Compliance Method (Federal Work Practice Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall conduct semi-annual inspections of the gasoline storage tank and dispensing operation while the tank is being filled by inspecting at applicable operating requirements established by 40 CFR 63 Subpart CCCCC.

Recordkeeping

B. Pursuant to Section 39.5(7)(a) and (d) of the Act, the Permittee shall keep on site written operating procedures or instructions on how to implement operating requirements established by 40 CFR 63 Subpart CCCCC.

C. Pursuant to Section 39.5(7)(a) and (d) of the Act, the Permittee shall maintain the records of conducted inspections, with a date and results of such inspections.

3. Non-Applicability Determinations

a. 40 CFR 64, Compliance Assurance Monitoring (CAM)

The gasoline storage tank does not use an add-on control device to achieve compliance with an emission limitation or standard.

b. The gasoline storage tank is not subject to 35 IAC 215.301 because the gasoline storage tank does not use organic material as defined in 35 IAC 211.4250(b).

4. Other Requirements

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As of the date of issuance of this permit, there are no such requirements that need to be included for these emission units.

5. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements, unless a NESHAP or NSPS standard specifies a different time frame, as follows:
 - I. Requirements in Condition 4.9(2)(a)(i) and (b)(i)
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - F. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

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4.10 Miscellaneous VOM Emitting Activities

1. Emission Units and Operations					
Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Ladle Refractory Lining Installation	VOM	Pre-2003	None	None	None
General Solvent Use	VOM	N/A	None	None	None

2. Applicable Requirements

For the emission units in Condition 4.10 above, the Permittee shall comply with the following applicable requirements pursuant to 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

- a. **i. Volatile Organic Material Emissions (VOM)**
 - A. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in Sections 215.302, 215.303, 215.304.
- ii. Compliance Method (VOM Requirements)
 - Recordkeeping
 - Pursuant to Section 39.5(b) and (d) of the Act, the Permittee shall keep the following records:
 - A. Total VOM solvent usage (gal/mo and gal/yr).

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- B. Density of applied solvents (lb/gal).
- C. VOM containing material usage for ladle refractory lining (lb/mo and lb/yr).
- D. Emissions of VOM for each operation (lb/hr and tons/yr, based on the actual monthly VOM usage), with supporting calculations.

3. Work Practice Requirements

As of the date of issuance of this permit, there are no such requirements that need to be included for these emission units.

4. Non-Applicability Determinations

- a. 40 CFR 64, Compliance Assurance Monitoring (CAM)

Miscellaneous VOM emitting activities do not use an add-on control device to achieve compliance with any emission limitation or standard.

5. Other Requirements

As of the date of issuance of this permit, there are no such requirements that need to be included for these emission units.

6. Reporting Requirements

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

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements, unless a NESHAP or NSPS standard specifies a different time frame, as follows:
 - I. Requirements in Condition 4.10(2)(a)(i)
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

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4.11 EAF #8 Main Cooling Tower

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Cooling Tower	PM	2001	None	None	None

2. Applicable Requirements

For the emission units in Condition 4.11 above, the Permittee shall comply with the following applicable requirements pursuant to 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

- a. i. Opacity Requirements
 - A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.
- ii. Compliance Method (Opacity Requirements)
 - Monitoring
 - A. Pursuant to Section 39.5(7)(a) and (d) of the Act, annual opacity observations shall be performed by a certified observer in accordance with Method 9 for a cooling tower while the tower is operating. The duration of opacity observations shall be at least 30 minutes unless no visible emissions are observed during the first 12 minutes of observations.

Recordkeeping

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- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of opacity observations.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.321(c).
- B. Pursuant to construction permit 00100084, the Permittee shall not exceed the following limits [T1]:

Pollutant	(lb/hr)	(tons/year)
PM ₁₀	1.2	5.3

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to construction permit 00100084, 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 months total).
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform monthly inspections of the equipment that is important to the operation of the cooling tower.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to PM emissions:
 - I. Monthly and annual emissions of PM/PM₁₀ (tons/month/year), with supporting calculations.
 - II. Records of monthly inspections along with the logs of maintenance activities performed.

c. i. Operational or Production Requirements

- A. Pursuant to construction permit 00100084, the Permittee shall not exceed the following limits [T1]:

Affected Equipment	Material	Throughput (gallons/minute)
Cooling Tower	Water	30,000

ii. Compliance Method (Operational or Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b), the Permittee shall keep the records of hourly and monthly cooling water throughput rates.

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3. Work Practice Requirements

As of the date of issuance of this permit, there are no such requirements that need to be included for these emission units.

4. Non-Applicability Determinations

a. 40 CFR 64, Compliance Assurance Monitoring (CAM)

Cooling tower does not use an add-on control device to achieve compliance with any emission limitation or standard.

b. Cooling tower is not subject to 40 CFR Part 63, Subpart Q, Industrial Cooling Towers, because the cooling tower is not operated with chromium-based water treatment chemicals.

5. Other Requirements

As of the date of issuance of this permit, there are no such requirements that need to be included for these emission units.

6. Reporting Requirements

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

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements, unless a NESHAP or NSPS standard specifies a different time frame, as follows:

H. Requirements in Conditions 4.11(2)(a)(i), (b)(i) and (c)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

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Section 5 - Additional Title I Requirements

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

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Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

Pursuant to 35 IAC 201.146, this condition is reserved for insignificant activities obligated to comply with Sections 9.1(d) and Section 39.5 of the Act; Sections 165, 173, and 502 of the Clean Air Act; or any other applicable permit or registration requirements. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

2. Insignificant Activities in 35 IAC 201.210(a)

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

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
HCL Storage Tanks	2	35 IAC 201.210(a)(1) and 201.211
Ethylene Glycol Storage Tank	1	35 IAC 201.210(a)(1) and 201.211
Cooling Towers	5	35 IAC 201.210(a)(1) and 201.211
Wastewater Treatment Lagoon	1	35 IAC 201.210(a)(1) and 201.211
Etchers	2	35 IAC 201.210(a)(1) and 201.211
Robot Tundish Spray Machine	1	35 IAC 201.210(a)(2) or (a)(3)
Sulfuric Acid Tank	2	35 IAC 201.210(a)(2) or (a)(3)
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).	135	35 IAC 201.210(a)(4)
Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oil.	4	35 IAC 201.210(a)(11)
Gas turbines and stationary reciprocating internal combustion engines < 112 kW (150 HP).	2	35 IAC 201.210(a)(15)
Gas Turbines and Engines between 112 KW and 1,118 KW (150 and 1,500 HP) that are emergency or standby units.	5	35 IAC 201.210(a)(16)

3. Insignificant Activities in 35 IAC 201.210(b)

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

4. Applicable Requirements

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

- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 or 212.322 (see Conditions 7.2(a) and (b)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source

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or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.

- c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.
- e. Pursuant to 35 IAC 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 215.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

5. Compliance Method

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

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

6. Notification Requirements for Insignificant Activities

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

a. Notification 7 Days in Advance

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

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

b. Notification Required at Renewal

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

c. Notification Not Required

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

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Section 7 - Other Requirements

1. Testing

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

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- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:
- i. General information including emission unit(s) tested.
 - ii. A summary of results.
 - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
 - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - v. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vii. An explanation of any discrepancies among individual tests or anomalous data.
 - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
 - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
 - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

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2. PM Process Weight Rate Requirements

a. New Process Emission Units - 35 IAC 212.321

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

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation [35 IAC 212.321(b)]:

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

Where:

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

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

A = 2.54
 B = 0.53

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

A = 24.8
 B = 0.16

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

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

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3. 40 CFR 63 Subpart A Requirements (NESHAP)

a. 40 CFR 63 Subpart A and Subpart YYYY - Electric Arc Furnace Steelmaking Facilities

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

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

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4. Shutdown Requirements

a. Shutdown Provisions

Pursuant to Section 39.5(7)(b) of the Act, the source is subject to the following during shutdown:

- i. At all times during shutdown, the source shall, to the extent practicable, operate in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether emissions were minimized during a shutdown will be based on information available to the IEPA or the USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- ii. The source shall operate in accordance with written shutdown procedures that shall include at a minimum:
 - A. Review of operating parameters during shutdown as necessary for the proper operation with appropriate adjustments to reduce emissions.
 - B. An estimate of emissions associated with the shutdown.

b. Period Monitoring - Recordkeeping

Pursuant to Section 39.5(7)(b) of the Act, the source shall fulfill the following recordkeeping requirements for shutdown procedures:

- i. Date, time, duration and the cause of shutdown.
- ii. A description of shutdown, if written operating procedures are not followed during shutdown or significant problems occur during the shutdown, including detailed explanation.
- iii. An explanation of whether excess emissions occurred that violated an applicable requirement.

c. Monitoring - Reporting

Pursuant to Sections 39.5(7)(b) and (f) of the Act, the source shall submit the following reporting requirements:

i. Semiannual Reporting

As part of the required Semiannual Monitoring Reports, the source shall submit a shutdown report including the following at a minimum: a list of the shutdowns including the date, duration, and description of each startup accompanied by any explanations whether the most recent shutdown procedures were or were not performed and whether excess emissions occurred that violated an applicable requirement.

5. Malfunction Breakdown Requirements

a. Malfunction Breakdown Provisions

Pursuant to 35 IAC 201.149, 201.161, and 201.262, the source is authorized to continue operation in violation of the applicable requirements (as referenced in Section 4 of the CAAPP permit) during malfunction or breakdown. The source has applied for such authorization in its application, generally describing "such continued operation is

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necessary to prevent injury to persons or severe damage to equipment; or that such continued operation is required to provide essential services; provided, however, that continued operation solely for the economic benefit of the source shall not be sufficient for granting of permission." As provided by 35 IAC 201.265, authorization in this CAAPP permit for continued operation during malfunction or breakdown does not shield the source from enforcement for any violation of applicable emission standard(s) that occurs during malfunction or breakdown and only constitutes a prima facie defense to such an enforcement action provided that the source has fully complied with all terms and conditions connected with such authorization.

- i. Upon continued operation in violation of the applicable requirements during malfunction or breakdown, the source shall as soon as practical, remove from service and repair the emission unit(s) or undertake other measures as described in the application so that any violation of the applicable requirements cease.
- ii. For continued operation in violation of the applicable requirements during malfunction or breakdown, the time shall be measured from the start of a particular incident and ends when violation of the applicable requirements ceases. The absence of a violation of the applicable requirements for a short period shall not be considered to end the incident if a violation of the applicable requirements resume. In such circumstances, the incident shall be considered to continue until corrective measures are taken so that a violation of the applicable requirements cease or the source takes the emission unit(s) out of service.
- iii. Following notification to the IEPA of continued operation in violation of the applicable requirements during malfunction or breakdown, the source shall comply with all reasonable directives of the IEPA with respect to such incident, pursuant to 35 IAC 201.263.

b. Monitoring - Recordkeeping

Pursuant to Section 39.5(7)(b) of the Act and 35 IAC 201.263, the source shall maintain records of continued operation in violation of the applicable requirements during malfunction or breakdown shall include at a minimum:

- i. A malfunction breakdown plan that includes the following at a minimum:
 - A. Estimates of typical emissions during malfunction or breakdown.
 - B. Reasonable steps that will be taken to minimize emissions, duration, and frequency of malfunction or breakdown.
- ii. Date and duration of the malfunction or breakdown.
- iii. A detailed explanation of the malfunction or breakdown.
- iv. An explanation why the emission unit(s) continued operation.
- v. The measures used to reduce the quantity of emissions and the duration of the event.
- vi. The steps taken to prevent similar malfunctions or breakdowns and reduce their frequency and severity.
- vii. An explanation of whether emissions during malfunction or breakdown were above typical emissions in the malfunction or breakdown procedures and whether emissions exceeded any applicable requirements.

c. Monitoring - Reporting

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Pursuant to Sections 39.5(7)(b) and (f) of the Act and 35 IAC 201.263, the source shall provide the following notification and reports to the IEPA, Compliance Section and Regional Field Office (addresses are included in Attachment 3) concerning continued operation in violation of the applicable requirements during malfunction or breakdown:

i. Prompt Reporting

When the granted duration is exceeded (as referenced in Section 4 of the CAAPP permit) or continued operation in violation of the applicable requirements during malfunction or breakdown:

- A. The source shall notify the IEPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunction or breakdown.
- B. Upon achievement of compliance, the source shall give a written follow-up notice within 15 days to the IEPA, Air Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation was necessary, the length of time during which operation continued under such conditions, the measures taken by the source to minimize and correct deficiencies with chronology, and when the repairs were completed or when the unit(s) was taken out of service.
- C. If compliance is not achieved within 5 working days of the occurrence, the source shall submit interim status reports to the IEPA, Air Compliance Section and Regional Field Office, within 5 days of the occurrence and every 14 days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete or the emission unit(s) will be taken out of service.

ii. Semiannual Reporting

As part of the required Semiannual Monitoring Reports, the source shall submit a semiannual malfunction breakdown report including the following at a minimum:

- A. A listing of all malfunctions and breakdowns, in chronological order, that includes: the date, time, and duration of each incident; and identity of the affected operation(s) involved in the incident.
- B. Dates of the notices and reports required by Prompt Reporting requirements of 3(A) above.
- C. The aggregate duration of all incidents during the reporting period.
- D. If there have been no such incidents during the reporting period, this shall be stated in the report.

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6. Compliance Assurance Monitoring (CAM) Requirements

a. CAM Provisions

i. Proper Maintenance

Pursuant to 40 CFR 64.7(b), at all times, the source shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

ii. Continued Operation

Pursuant to 40 CFR 64.7(c), except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the source shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit (PSEU) is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The source shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

iii. Response to Excursions or Exceedances

A. Pursuant to 40 CFR 64.7(d)(1), upon detecting an excursion or exceedance, the source shall restore operation of the PSEU (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

B. Pursuant to 40 CFR 64.7(d)(2), determination of whether the source has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device.

b. Monitoring - Monitoring

Pursuant to 40 CFR 64.7(a), the source shall comply with the monitoring requirements of the CAM Plans as described in tables 7.6.1 and 7.6.1 below, pursuant to 40 CFR Part 64 as submitted in the source's CAM plan application.

c. Monitoring - Recordkeeping

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Pursuant to 40 CFR 64.9(b)(1), the source shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information related to the monitoring requirements established for CAM.

d. Monitoring - Reporting

Pursuant to Sections 39.5(7)(b) and (f) of the Act, the source shall submit the following reporting requirements:

i. Semiannual Reporting

As part of the required Semiannual Monitoring Reports, the source shall submit a CAM report including the following at a minimum:

- A. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(i).
- B. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(ii).

e. CAM Plans

The following tables contain the CAM Plans in this CAAPP permit:

Table	Emission Unit Section	PSEU Designation	Pollutant
7.6.1	4.1	EU-1	PM/PM ₁₀
7.6.2	4.3	EU-2	PM/PM ₁₀

Table 7.6.1 - CAM Plan

Emission Unit Section:	4.1
PSEU Designation:	EU-1
Pollutant:	PM/PM ₁₀

Indicators:	#1) Pressure Drop	#2) None
General Criteria		
The Monitoring Approach Used to Measure the Indicators:	Continuous monitoring of pressure drop across the baghouse	None
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	2 to 14 inches of water	None
Quality Improvement Plan (QIP) Threshold Levels:	Outside the range of 2 to 15 inches of water	None
Performance Criteria		
The Specifications for Obtaining Representative Data:	Monthly visual inspections of baghouse	None
Verification Procedures to Confirm the Operational Status of the Monitoring:	N/A	None
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Periodic calibration of pressure gauges as required by manufacturer's procedures and replacement of gauges, if needed	None
The Monitoring Frequency:	Continuous	None
The Data Collection Procedures That Will Be Used:	Total pressure drop is electronically recorded as four 15-minute averages per hour	None
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	Hourly	None

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Table 7.6.2 - CAM Plan

Emission Unit Section:	4.3
PSEU Designation:	EU-2
Pollutant:	PM/PM ₁₀

Indicators:	#1 Opacity Readings	#2 None
General Criteria		
The Monitoring Approach Used to Measure the Indicators:	Opacity from the baghouse exhaust will be monitored daily by using Method 9	None
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	The indicator level is <20% opacity levels. An excursion is defined as >15% opacity. Excursion triggers an inspection and corrective action.	None
Quality Improvement Plan (QIP) Threshold Levels:	The QIP threshold is five excursions in a six-month reporting period.	None
Performance Criteria		
The Specifications for Obtaining Representative Data:	Measurements are made at the emission point (baghouse exhaust).	None
Verification Procedures to Confirm the Operational Status of the Monitoring:	N/A	None
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Experienced observer will be trained and certified for following Method 9 procedures/opacity reading.	None
The Monitoring Frequency:	A six-minute Method 9 will be made daily when operating.	None
The Data Collection Procedures That Will Be Used:	Observations will be recorded in operator log.	None
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	Not Applicable. Opacity reading exceedance will trigger process shutdown and/or other corrective actions.	None

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Section 8 - State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

<i>Pollutant</i>		<i>Tons/Year</i>
Volatile Organic Material	(VOM)	209.58
Sulfur Dioxide	(SO ₂)	358.39
Particulate Matter	(PM)	543.00
Nitrogen Oxides	(NO _x)	687.29
HAP, not included in VOM or PM	(HAP)	----
Total		1,798.26

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Attachment 1 - List of Emission Units at This Source

<i>Section</i>	<i>Emission Units</i>	<i>Description</i>
4.1	Electric Arc Furnace	EAF #8 melts recycled scrap metal and other raw materials into molten steel with electric arcs from carbon electrodes.
4.2	EAF Dust Handling System	Baghouse dust is pneumatically transferred from the baghouse to a filter/receiver on the top of the silo. From a silo, dust is unloaded into a truck.
4.3	Ladle Metallurgy Facility (LMF)	Molten steel is transported by ladle to the LMF from the EAF for purposes of refinement for final chemistries.
4.4	Casting Operations	Molten steel is transported to the caster tundish and after leaving the tundish it enters water-cooled copper molds where molten steel is molded into semi-finished shapes.
4.5	12" Mill Reheat Furnace	Produces hot billets for rolling mill.
4.6	Miscellaneous Fuel Combustion Process Emission Units	Miscellaneous natural gas-fired torches, preheaters and cutters.
4.7	EAF Storage Silos and Material Handling Operations	Lime and carbon silos are used to support operations of EAF.
4.8	Cold Cleaning Degreasers	Degreasing and cleaning metal parts.
4.9	Gasoline Storage Tank	On site gasoline storage and dispensing.
4.10	Miscellaneous VOM emitting activities	Miscellaneous solvent cleaning usage and ladle refractory lining material usage.
4.11	EAF #8 Main Cooling Tower	Cooling EAF processing water

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Attachment 2 - Acronyms and Abbreviations

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

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LAER	Lowest Achievable Emission Rate
lb	Pound
m	Meter
MACT	Maximum Achievable Control Technology
mm	Million
mon	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

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Attachment 3 - Contact and Reporting Addresses

<p style="text-align: center;">IEPA Compliance Section</p> <p style="text-align: center;">IEPA Stack Test Specialist</p> <p style="text-align: center;">IEPA Air Quality Planning Section</p> <p style="text-align: center;">IEPA Air Regional Field Operations Regional Office #2</p> <p style="text-align: center;">IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, IL 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Regional Office #2 5415 North University Peoria, IL 61614</p> <p>Phone No.: 309/693-5462</p> <p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, IL 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p style="text-align: center;">USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, IL 60604</p> <p>Phone No.: 312/353-2000</p>

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Attachment 4 - Example Certification by a Responsible Official

SIGNATURE BLOCK	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

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