

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Sterling Steel Company, LLC
Attn: David Long, Environmental Manager
101 Avenue K
Sterling, Illinois 61081

Application No.: 96010019 I.D. No.: 195818AAI
Applicant's Designation: Date Received: January 8, 1996
Operation of: Steel Works and Rolling Mills
Date Issued: September 10, 2003 Expiration Date²: September 10, 2008
Source Location: 101 Avenue K, Sterling, Whiteside
Responsible Official: David Long, Environmental Manager

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

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

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

DES:MVH:psj

cc: Illinois EPA, FOS, Region 2

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated there under, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Sterling Steel Company, LLC
101 Avenue K
Sterling, Illinois 61081
815-548-7000

I.D. No.: 195818AAI
Standard Industrial Classification: 3312, Steel Works and Rolling
Mills

1.2 Owner/Parent Company

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

1.3 Operator

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

David Long/Environmental Manager
815-548-7000 Ext. 2451

1.4 General Source Description

The Sterling Steel Company, LLC is located at 101 Avenue K in Sterling, Illinois. The source manufactures semi-finished billets and finished rods.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

HCl Storage Tanks
Ethylene Glycol Storage Tank

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

4 Sulfuric Acid Tanks
1 Robot Tundish Spray Machine

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

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

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Die casting machines where a metal or plastic is formed under pressure in a die [35 IAC 201.210(a)(12)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

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

3.2 Compliance with Applicable Requirements

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

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

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Arc Furnace #7	1969	Flooded Disc Scrubber
	Arc Furnace #8	01/2000	Baghouse
02	EAF Dust Storage Silo	03/2000	Bin Vent Filter
	Silo Truck Loadout	03/2000	EAF #8 Baghouse
	Lime Silo DC-1 (55,000 Gallon)	6/1982	Bin Vent Filter
	Lime Silo DC-2 (14,000 Gallon)	6/1982	Bin Vent Filter
	Lime Silo DC-3 (55,000 Gallon)	01/2003	Bin Vent Filter
	Lime Silo DC-4 (19,000 Gallon)	10/1994	Bin Vent Filter
03	Ladle Metallurgy Station #1 (LMF1)	5/1989	Baghouse 1 (LMB1)
	Ladle Metallurgy Station #2 (LMF2)	5/1994	Baghouse 2 (LMB2)
04	Billet Caster	03/1981	None
	Bloom Caster	03/1981	None
05	Steltech Electrolytic Etcher	05/1999	None
06	12" Reheat Furnace (175 mmBtu/Hr)	05/1984	None
	7 Ladle Preheaters (10 mmBtu/hr)	2 - 1972 4 - 1976 1 - 2003	None
	2 Caster Strand Cutters (16.3 and 12.22 mmBtu/Hr)	1980	None
	Weld Shop Oven (30 mmBtu/Hr)	01/1975	None
	2 Tundish Coating Dryers (9.6 mmBtu/Hr)	11/1991	None
	Torch Cutters (36.5 mmBtu/Hr)	Pre 1972	None
	30 Metal Degreasing Stations	Pre-1972	None
07	Gasoline Storage Tank (1,000 Gallon)	6/1990	None
08	General Solvent Use	Pre 1972	None
09	Cooling Tower #8	12/2001	None
10	PM and PM ₁₀ Emissions from Paved and Unpaved Roads	N/A	None
11	Fugitive PM Emissions		

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of PM, NO_x, SO₂, and VOM emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.
- 5.1.3 For purposes of the CAAPP, Sterling Steel Company is considered a single source with Stein Steel, I.D. No. 195050 AHN, located at Sterling Steel Company. The source has elected to obtain separate CAAPP permits for these locations.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
 - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- 5.2.3 Fugitive Particulate Matter Operating Program
 - a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.2.4 Ozone Depleting Substances

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

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

5.2.5 Risk Management Plan

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

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

- 5.2.6 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.7 Episode Action Plan

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

- iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.8 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	112.50
Sulfur Dioxide (SO ₂)	166.50
Particulate Matter (PM)	565.00
Nitrogen Oxides (NO _x)	477.00
HAP, not included in VOM or PM	2.30
Total	1,323.3

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the weight percent of each HAP in the organic material emissions for each organic liquid and the organic material emissions attributable to the storage and handling of that liquid, as determined by the current version of the TANKS program.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart FFFFF - National Emission Standards for Integrated Iron and Steel Manufacturing do not apply to the source.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Retention and Availability of Records

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

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01: Arc Furnaces #7 and #8
Control 01: Flooded Disc Scrubber, Baghouse

7.1.1 Description

Sterling Steel Company utilizes two (2) 400 ton arc furnaces for the melting of scrap steel. Arc Furnace #8, installed in 2,000 is the primary furnace and Arc Furnace #7 installed in 1969 is used only in case of backup. Arc Furnace #7 is controlled by a flooded disc scrubber while Arc Furnace #8 is controlled by a baghouse.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	Arc Furnace #7	Flooded Disc Scrubber
	Arc Furnace #8	Baghouse

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected furnaces" for the purpose of these unit-specific conditions, are the arc furnaces listed in Condition 7.1.2.
- b. Affected Furnaces #7 and #8 are subject to the emission limits identified in Condition 5.2.2.
- c. Malfunction and Breakdown Provisions

In the event of a malfunction or breakdown of the affected furnaces, the Permittee is authorized to continue operation of the affected furnaces in violation of the applicable requirement of 35 IAC Subpart 212, as necessary to prevent risk of injury to personnel or severe damage to equipment. This authorization is subject to the following requirements:

- i. The Permittee shall repair the damaged feature(s) of the affected furnaces or remove the affected furnaces from service as soon as practicable. Continued operation of the furnace is only allowed for the furnace to be emptied of molten steel. No new charges shall commence until the malfunction is repaired.
- ii. The Permittee shall fulfill the applicable recordkeeping and reporting requirements of Conditions 7.1.9(c) and 7.1.10(a).

- d. Affected Furnace #8 is subject to a New Source Performance Standard (NSPS) for Steel Plants, 40 CFR 60, Subparts A and AAa, because it was originally constructed after August 7, 1983. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- e. Affected Furnace #8 is subject to 40 CFR 60.272a which states:
 - i. No owner or operator shall cause to be discharged into the atmosphere from an affected EAF any gases which:
 - A. Exit from a control device and contain particulate matter in excess of 12 mg/dscm (0.0052 gr/dscm);
 - B. Exit from a control device and Exhibit 3 percent opacity or greater; and
 - C. Exit from a shop and, due solely to operations of any affected EAF(s) Exhibit 6 percent opacity or greater.
 - ii. No owner or operator shall cause to be discharged into the atmosphere from the dust-handling system associated with an affected EAF any gases that Exhibit 10 percent opacity or greater. [40 CFR 60.272a]
- f. Affected Furnace #8 is subject to 35 IAC 212.321 which states:
 - i. The total particulate emissions from the affected furnace including meltdown and refining, charging, tapping, slagging, electrode port leakage and ladle lancing shall not exceed the allowable emission rate specified by 35 IAC 212.321.

Accordingly, emissions of particulate matter into the atmosphere from the furnace in any one hour period shall not exceed the allowable emission rate specified by the following equation.

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

Where:

P = Process weight rate, in tons per hour

E = Allowable emission rate, in pounds per hour

For process weight rates up to 450 T/hr:

A 2.54

B 0.534

For process weight rates in excess of 450 T/hr:

A 24.8

B 0.16

[35 IAC 212.321]

- g. Affected Furnaces #7 and #8 are subject to 35 IAC 214.301 which states:

Except as further provided by this Part, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm.
[35 IAC 214.301]

- h. Affected Furnace #7 is subject to 35 IAC 212.322 which states:

- i. The total particulate emissions from the affected furnace including meltdown and refining, charging, tapping, slagging, electrode port leakage and ladle lancing shall not exceed the allowable emission rate specified by 35 IAC 212.322.

Accordingly, emissions of particulate matter into the atmosphere from the furnace in any one-hour period shall not exceed the allowable emission rate specified by the following equation.

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

Where:

P = Process weight rate, in tons per hour

E = Allowable emission rate, in pounds per hour

For process weight rates up to 30 T/hr:

A 4.10

B 0.67

C 0

For process weight rates in excess of 30 T/hr:

A 55.0

B 0.11

C - 40.0

[35 IAC 212.322]

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected furnaces not being subject to 35 IAC 215.301, because its organic material emissions do not qualify as photochemically reactive material.
- b. This permit is issued based on the affected Furnace #7 not being subject to 40 CFR 60 Subparts AA and AAa, because affected Furnace #7 was constructed prior to October 21, 1974. [40 CFR 60.270(b)]

7.1.5 Operational and Production Limits and Work Practices

- a. At all times, the Permittee shall, to the extent practicable, maintain and operate the affected furnaces, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. [40 CFR 60.11(d)]
- b. Affected Furnace #7 shall only be used for backup.

7.1.6 Emission Limitations

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

- a. Steel production of the affected furnaces shall not exceed 1,630,000 tons/year. Compliance with this limitation shall be determined from a running total of 12 months of data.
- b. Emissions from the affected furnaces shall not exceed the following limits:

Pollutant	(Tons/Mo)	(Tons/yr)
PM	24	234.3
CO	385	3,830
NO _x	60	595
VOM	28	277.1
SO ₂	53	530
Lead	0.41	4.08

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 00020018, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.1.7 Testing Requirements

- a. Upon request by the Illinois EPA under section 114 of the act, the Permittee shall have performance test(s) conducted and furnish the Illinois EPA a written report of the results of such performance test(s).
- b.
 - i. The following methods and procedures shall be used for testing or particulate matter emissions and opacity:
 - A. Method 5 shall be used for negative pressure fabric filters and other types of control devices and Methods 5D shall be used for positive-pressure fabric filters to determine the particulate matter concentration and volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 4 hours and 4.5 dscm (160 dscf) and, when a single EAF or AOD vessel is sampled, the sampling time shall include an integral number of heats.
 - B. Method 9 and the procedures of 40 CFR 60.11 shall be used to determine opacity.
 - C. To demonstrate compliance with 40 CFR 60.272a(a) (1), (2), and (3), test runs shall be conducted concurrently, unless inclement weather interferes.
 - ii. The following methods and procedures shall be used for testing emissions of pollutants other than particulate matter. Refer to 40 CFR 60, Appendix A for USEPA test methods.

Location of Sample Points	USEPA Method 1
Sulfur Dioxide	USEPA Method 6
Nitrogen Oxide	USEPA Method 7
Carbon Monoxide	USEPA Method 10
Lead	USEPA Method 12 or Method 29

- c. At least 60 days prior to the actual date of testing, a written test plan shall be submitted to the Illinois EPA for review and approval. The plan shall describe the specific procedures for testing including as a minimum:
- i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - ii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum emissions, the levels of operating parameters at or within which compliance is intended to be shown, if parameters for the process and any control equipment will be determined.
 - iii. The specific determination of emissions and operations which are intended to be made, including sampling and monitoring locations.
 - iv. The test methods which will be used, with the specific analysis method.
 - v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
 - vi. A statement that the testing will be performed by a qualified independent testing service.
- d. Prior to carrying out these tests, the Illinois EPA shall be notified a minimum of thirty (30) days prior to the scheduled date of these tests with the exact date, time and place of these tests, to enable the Illinois EPA to witness these tests.
- e. If the scheduled date for the test is changed the Permittee shall inform the Illinois EPA within five working days of the scheduled test date and must specify the date of the rescheduled test.

- f. A copy of the Final Reports for these tests and compliance status shall be submitted to the Illinois EPA within fourteen days after the test results are compiled and finalized, prior to or accompanying the operating permit application. Satisfactory completion of these tests and compliance with the limitations of this permit shall be prerequisite to the issuance of an operating permit.

7.1.8 Monitoring Requirements

- a. 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.
 - i. Except as provided under paragraphs (ii) of this section, a continuous monitoring system for the measurement of the opacity of emissions discharged into the atmosphere from the baghouse associated with the EAF shall be installed, calibrated, maintained, and operated by the owner or operator subject to the provisions of this Subpart.
 - ii. A continuous monitoring system for the measurement of opacity is not required on modular, multiple-stack, negative pressure or positive-pressure fabric filters if observations of the opacity of the visible emissions from the control device are performed by a certified visible emission observer as follows: visible emission observations are conducted at least once per day when the furnace is operating in the melting and refining period. These observations shall be taken in accordance with Method 9, and, for at least three 6-minute periods, the opacity shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emissions, only one set of three 6-minute observations will be required. In this case, Method 9 observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident. Records shall be maintained of any 6-minute average that is in excess of the emission limit specified in 40 CFR 60.272a(a). [40 CFR 60.273a(a), (b), (c), and (d)]

- b. The Permittee shall conduct monitoring for affected Furnace #8 as required by 40 CFR 60.274a.
- c. The Permittee shall monitor the pressure drop across the scrubber and the load on the scrubber motor for affected Furnace #7

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected furnaces to demonstrate compliance with Conditions 5.5.1 and 7.1.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Material throughput (tons/day and tons/month).
- b. Records of measurements as required by Condition 7.1.8 must be retained for at least 5 years following the date of the measurement.
- c. Records for Malfunctions and Breakdowns of the affected arc furnaces

The Permittee shall maintain records, pursuant to 35 IAC 201.263, of continued operation of an affected furnace subject to 35 IAC Part 212 during malfunctions and breakdown of the control features of the affected furnace, which as a minimum, shall include:

- i. Date and duration of malfunction or breakdown;
- ii. A detailed explanation of the malfunction or breakdown;
- iii. An explanation why the damaged feature(s) could not be immediately repaired or the affected furnace removed from service without risk of injury to personnel or severe damage to equipment;
- iv. The measures used to reduce the quantity of emissions and the duration of the event;
- v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity; and
- vi. The amount of release above typical emissions during malfunction/breakdown.

- d. The Permittee shall maintain records of the air pollution control inlet volumetric flow rate in accordance with 40 CFR 60.274a(b).
- e. The Permittee shall maintain records of the damper positions in accordance with 40 CFR 60.274a(b) and (c).
- f. The Permittee shall maintain records of control device fan motor amperage in accordance with 40 CFR 60.274a(b) and (c).
- g. All monthly operational status inspections performed under 40 CFR 60.274a(d).
- h. The Permittee shall maintain records of emissions in tons/mo and tons/yr.

7.1.10 Reporting Requirements

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

- a. Reporting of Malfunctions and Breakdowns for affected furnaces

The Permittee shall provide the following notification and reports to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to 35 IAC 201.263, concerning continued operation of a affected arc furnace subject to Condition 7.1.3(c) during malfunction or breakdown of the control features of the affected furnaces.

- i. The Permittee shall notify the Illinois EPA'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.
- ii. Upon achievement of compliance, the Permittee shall give a written follow-up notice to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation of the affected furnace was necessary, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize

and correct deficiencies with chronology, and when the repairs were completed or when the affected furnace was taken out of service.

- iii. If compliance is not achieved within 5 working days of the occurrence, the Permittee shall submit interim status reports to the Illinois EPA, 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 affected furnace will be taken out of service.
- b. The Permittee shall submit a written report of excess emissions to the Illinois EPA semi-annually in accordance with the NSPS 40 CFR 60.7(c) and 60.276a(b). For the purposes of these reports, excess emissions are defined as all 6-minute periods during which average opacity is 3 percent or greater.
- c. The Permittee shall promptly notify the Illinois EPA, Compliance Section of any other exceedance with the emission limitation in the permit of the affected furnaces with the permit requirements. These reports shall be submitted within 30 days of the exceedance and shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
- d. Two copies of required reports and notifications concerning equipment operation or repairs, performance testing or continuous monitoring systems shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

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

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Emissions from affected furnace #7 shall be calculated using the following emission factors and equation.

NO _x (lb/ton)	SO ₂ (lb/ton)	VOM (lb/ton)	CO (lb/ton)	PM (lb/ton)	Lead (lb/ton)
0.9	0.7	0.35	7.4	0.2982	0.005

- Emissions (tons) = [(steel throughput (tons)) * (appropriate emission factor (lb/ton))]/2000 lb/ton
- PM₁₀ Emissions (tons) = PM Emissions (tons) x 0.76

Emission factors are obtained from a stack test accomplished on arc furnace 7 scrubber in October 1995.

- b. Emissions from affected furnace #8 shall be calculated using the following emission factors and equation.

NO _x (lb/ton)	SO ₂ (lb/ton)	VOM (lb/ton)	CO (lb/ton)	PM (lb/ton)	Lead (lb/ton)
0.73	0.65	0.34	4.7	0.0397	0.005

- Emissions (tons) = [(steel throughput (tons)) * (appropriate emission factor (lb/ton))]/2000 lb/ton
- PM₁₀ Emissions (tons) = PM Emissions (tons) x 0.76

Emission factors are obtained from a stack test accomplished on arc furnace 8 baghouse on 11/29 through 12/01 of 2000.

- c. Compliance with Condition 7.1.3 e. shall be determined from the daily method 9 observations accomplished during furnace melting and refinement.

- 7.2 Unit 02: EAF Dust Storage Silo and Lime Silo Storage
 Control 02: Negative Pressure Fabric Filter - Silo
 EAF #8 Baghouse - Truck Loadout
 Bin Vent Filters - Lime Silo Storage

7.2.1 Description

Baghouse dust is pneumatically transferred from the baghouse to a filter/receiver on the top of the silo. Pneumatic transfer is provided by a blower. Once the silo is filled, the dust is transferred from the silo to dump trucks or roll-off boxes under the silo. EAF #8 baghouse controls particulate emissions during truck loading and a bin vent controls emissions during pneumatic loading to the silo. Three storage silos (DC-1, DC-2, and DC-3) are located at the facility for lime storage, each controlled by a bin vent filter. The lime is used in manufacturing of the steel. Storage Silo (DC-4) is used to store hydrated lime which is utilized in the wastewater treatment plant.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
02	EAF Dust Storage Silo	Bin Vent Filter
	Silo Truck Loadout	EAF #8 Baghouse
	Lime Silo Storage (DC-1, DC-2, DC-3, and DC-4)	Bin Vent Filters

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected silos" for the purpose of these unit-specific conditions, are the silos listed in Condition 7.2.2.
- b. The affected silos are subject to the emission limits identified in Condition 5.2.2.
- c. The affected silos are subject to 35 IAC 212.321 which states:
 - i. Except as further provided in this Part, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.

- ii. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

P = Process weight rate, in tons per hour

E = Allowable emission rate, in pounds per hour

For process weight rates up to 450 T/hr:

A 2.54

B 0.534

For process weight rates in excess of 450 T/hr:

A 24.8

B 0.16

[35 IAC 212.321]

- d. The affected EAF Dust Storage Silo and Silo Truck Loadout operations are subject to 40 CFR 60.272a which states:

No owner or operator shall cause to be discharged into the atmosphere from the dust-handling system associated with an affected EAF any gases that Exhibit 10 percent opacity or greater. [40 CFR 60.272a]

7.2.4 Non-Applicability of Regulations of Concern

N/A

7.2.5 Operational and Production Limits and Work Practices

N/A

7.2.6 Emission Limitations

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

Emissions from the affected silos shall not exceed the following limits:

Item of Equipment	Operating Hours (Hours/Year)	Throughput (Lb/Hour)	PM Emissions (Lb/Hour)	PM Emissions (Tons/Year)
EAF Dust Conveying	8,760	11,000	0.000055	0.00022
Truck Loading EAF Dust	4,380	50,000	0.25	0.55

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 00050081, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

Emissions from the affected silos shall not exceed the following limits:

Item of Equipment	Throughput (Tons/Year)	PM Emissions (Tons/Year)
Lime Silo (DC-1)	50,370	0.06
Lime Silo (DC-2)	50,370	0.06
Lime Silo (DC-3)	920	Negligible
Lime Silo (DC-4)	1,010	Negligible

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 89030072, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.2.7 Testing Requirements

N/A

7.2.8 Monitoring Requirements

N/A

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected silos to demonstrate compliance with Conditions 5.5.1 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Material throughput (tons/month and tons/year).
- b. The Permittee shall maintain records of emissions in tons/mo and tons/yr.
- c. The Permittee shall maintain records of the air pollution control inlet flow rate in acfm.
- d. The Permittee shall maintain records of the air pollution control hood damper positions once per shift.
- e. The Permittee shall maintain records of the air pollution control fan motor amperage.
- f. The Permittee shall maintain records of lime throughput on a monthly basis for the individual lime silos in tons/month.

7.2.10 Reporting Requirements

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

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of any other exceedance with the emission limitation in the permit of the affected silos with the permit requirements. These reports shall be submitted within 30 days of the exceedance and shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Emissions from the affected silo (EAF Dust Storage Silo) shall be calculated using the following emission factors and equation.

PM (Lb/ton)	PM ₁₀ (lb/ton)
0.00236	0.0018

- Emissions (tons) = [(dust throughput (tons)) * (appropriate emission factor (lb/ton))]/2000 lb/ton

Emission factors are referenced from IEPA permit 89030072.

- b. Emissions from the affected silo (Silo Truck Loadout) shall be calculated using the following emission factors and equation.

PM (Lb/ton)	PM ₁₀ (lb/ton)
0.00697	0.005

- Emissions (tons) = [(dust throughput (tons)) * (appropriate emission factor (lb/ton))]/2000 lb/ton

Emission factors are referenced from IEPA Permit 00050081.

- c. Emissions from the affected silo (lime silo storage) shall be calculated using the following emission factors and equation.

PM (Lb/ton)	PM ₁₀ (Lb/Ton)
0.00236	0.002

- Emissions (tons) = [(lime throughput (tons)) * (appropriate emission factor (lb/ton))]/2000 lb/ton

Emission factors are referenced from IEPA Permit 89030072.

- 7.3 Unit 03: Ladle Metallurgy Facilities #1 and #2
Control 03: Baghouses 1 and 2

7.3.1 Description

Molten steel from the arc furnaces is tapped into a ladle and transported to one of two ladle metallurgy stations by crane. Here further specification refinements are made to the metal by adding various types of additives, thus changing the composition and material property of the metal. The metal at these stations are kept at molten temperature by a group of smaller arc electrodes. A stirring action is accomplished by argon injection into the ladle, which distributes all additives uniformly through the ladle by a stirring action.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
03	Ladle Metallurgy Station #1 (LMF1)	Baghouse 1 (LMB1)
	Ladle Metallurgy Station #2 (LMF2)	Baghouse 2 (LMB2)

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected ladle metallurgy stations" for the purpose of these unit-specific conditions, are the operations listed in Condition 7.3.2.
- b. The affected ladle metallurgy stations are subject to the emission limits identified in Condition 5.2.2.
- c. The affected ladle metallurgy stations are subject to 35 IAC 212.321 which states:
 - i. Except as further provided in this Part, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.
 - ii. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

P = Process weight rate, in tons per hour

E = Allowable emission rate, in pounds per hour

For process weight rates up to 450 T/hr:

A 2.54

B 0.534

For process weight rates in excess of 450 T/hr:

A 24.8

B 0.16

[35 IAC 212.321]

7.3.4 Non-Applicability of Regulations of Concern

N/A

7.3.5 Operational and Production Limits and Work Practices

- a. The maximum molten steel rate for ladle metallurgy stations #1 and #2 combined shall not exceed 525 ton/hr.
- b. The maximum alloy addition to the ladle shall not exceed 2.5 tons/hour, not including alloys added to the ladle prior to the molten steel.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected ladle metallurgy stations are subject to the following:

Emissions from the affected ladle metallurgy stations shall not exceed the following limits:

Item of Equipment	PM Emissions (Lb/Hour)	PM Emissions (Tons/Year)
Ladle Metallurgy Stations #1 and #2	4.14	18.15

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 94110109, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.3.7 Testing Requirements

N/A

7.3.8 Monitoring Requirements

N/A

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected ladle metallurgy stations to demonstrate compliance with Conditions 5.5.1 and 7.3.6, pursuant to Section 39.5(7) (b) of the Act:

- a. Material throughput (tons/month and tons/year).
- b. The Permittee shall maintain records of emissions in tons/mo and tons/yr.

7.3.10 Reporting Requirements

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

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of any other exceedance with the emission limitation in the permit of the affected ladle metallurgy stations with the permit requirements. These reports shall be submitted within 30 days of the exceedance and shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. Emissions from the affected ladle metallurgy stations shall be calculated using the following emission factor and equation.

PM (Lb/ton)
0.0079

- $\text{PM Emissions (tons)} = [(\text{Steel throughput (tons)}) * (\text{appropriate emission factor (lb/ton)})] / 2000 \text{ lb/ton}$
- $\text{PM}_{10} \text{ Emissions (tons)} = \text{PM Emissions (tons)} \times 0.76$

Emission factors are referenced from IEPA Permit 89040021.

7.4 Unit 04: Billet and Bloom Casters
 Control 04: None

7.4.1 Description

SSC has two continuous casters. These systems process molten liquid steel into continuous lengths of solid steel. This operation results in a variety of cross sectional forms such as billets and blooms. At the initiation of the casting operation, molten steel is transported to the caster tundish in a refractory lined ladle. The molten steel leaves the bottom of the tundish and enters water cooled copper moldings. The solidifying steel is cut into designated lengths using strand cutters, or natural gas fired torches that blast the solidifying steel and emit particulate matter into a water flume below the surface.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
04	Billet Caster	None
	Bloom Caster	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected casters" for the purpose of these unit-specific conditions, are the casters listed in Condition 7.4.2.
- b. The affected casters are subject to 35 IAC 212.321 which states:
 - i. Except as further provided in this Part, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.
 - ii. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

P = Process weight rate, in tons per hour

E = Allowable emission rate, in pounds per hour

For process weight rates up to 450 T/hr:

A 2.54

B 0.534

For process weight rates in excess of 450 T/hr:

A 24.8

B 0.16

[35 IAC 212.321]

7.4.4 Non-Applicability of Regulations of Concern

N/A

7.4.5 Operational and Production Limits and Work Practices

None

7.4.6 Emission Limitations

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

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

7.4.7 Testing Requirements

N/A

7.4.8 Monitoring Requirements

N/A

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected casters to demonstrate compliance with Conditions 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of molten steel throughput (tons/month and tons/year).
- b. The Permittee shall maintain records of emissions in tons/mo and tons/yr.

7.4.10 Reporting Requirements

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

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of any other exceedance with the emission limitation in the permit of the affected casters with the permit requirements. These reports shall be submitted within 30 days of the exceedance and shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Emissions from the affected casters shall be calculated using the following emission factor and equation.

PM (lb/ton)
0.0243

- Emissions (tons) = [(Steel throughput (tons)) * (appropriate emission factor (lb/ton))]/2000 lb/ton
- PM₁₀ Emissions (tons) = PM Emissions (tons) x 0.76

Emission factors are based from an estimate used on the company annual emission report.

7.5 Unit 05: Steltech Electrolytic Etching System
Control 05: None

7.5.1 Description

SSC utilizes a steltech etcher for quality assurance and quality control purposes for the finished rod. This etcher utilizes a 36% concentrated cold hydrochloric acid solution. This operation is considered to be a pickling line and any gases generated in the unit are vented directly into the caster bay building.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
05	Steltech Etcher	None

7.5.3 Applicability Provisions and Applicable Regulations

a. The "affected etcher" for the purpose of these unit-specific conditions, is the etcher listed in Condition 7.5.2.

7.5.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected etcher not being subject to 35 IAC 212.321, because the process rate rule does not apply to pickling operations. [35 IAC 266.190(a)]
- b. This permit is issued based on the affected etcher not being subject to 40 CFR 63, Subpart CCC, Steel Pickling - HCl Process Facilities, because the source is not a major source for hazardous air pollutants (HAP) [40 CFR 63.1155].

7.5.5 Operational and Production Limits and Work Practices

None

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected etcher is subject to the following:

Item of Equipment	Emission Rate (Lb/Hour)	PM Emissions (Tons/Year)
Steltech Etcher	2.69	0.98

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 99060057, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected etcher to demonstrate compliance with Conditions 5.5.1 and 7.5.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the hours of operation (time spent without the lid completely covering the tank).
- b. The Permittee shall maintain records of emissions in tons/mo and tons/yr.

7.5.10 Reporting Requirements

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

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of any other exceedance with the emission limitation in the permit of the affected etcher with the permit requirements. These reports shall be submitted within 30 days of the exceedance and shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.5.12 Compliance Procedures

- a. Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

$$E_{\text{HCL}} = M \times K \times A \times P/R \times T$$

Where:

E_{HCL} = HCL emission rate

M = Molecular weight of HCl (36.5 lb/lb mole)

K = Calculated gas phase mass transfer coefficient
= $0.00348(u)^{0.78}(18/M)^{1/3}$ ft/s
= 2.23×10^{-3} ft/s

A = Area of tank (26.0 ft³)

P = Partial pressure of HCl for 36% solution at 68 degrees F (2.041 psia)

R = Ideal gas constant (10.73 psia ft³/R lb mole)

T = Temperature of HCl solution (538 R)

7.6 Unit 06: Combustion Sources
Control 06: None

7.6.1 Description

SSC has a single 12" mill reheat furnace. This furnace is used to reheat billets and blooms to a temperature of about 2200°F. Once this temperature is reached, the billets and blooms can then be rolled in the 12" rod mill to the desired finished product. Ladles are preheated prior to the introduction of 3000°F molten steel to prevent thermal shock of the refractory brick. Caster strand cutters and torch cutters are used to cut the cast solidified steel to the required lengths before being stored. The tundish coating dryers are used to cure the refractory coating material.

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
06	12" Reheat Furnace	None
	7 Ladle Preheaters	None
	2 Caster Strand Cutters	None
	Weld Shop Oven	None
	2 Tundish Coating Dryers	None
	Torch Cutters	None

7.6.3 Applicability Provisions and Applicable Regulations

a. The "affected combustion sources" for the purpose of these unit-specific conditions, is the equipment listed in Condition 7.6.2.

b. The affected combustion sources are subject to 35 IAC 216.121 which states:

No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source (excluding the 2 tundish coating dryers) with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air. [35 IAC 216.121]

7.6.4 Non-Applicability of Regulations of Concern

N/A

7.6.5 Operational and Production Limits and Work Practices

None

7.6.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected combustion sources are subject to the following:

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

7.6.7 Testing Requirements

N/A

7.6.8 Monitoring Requirements

N/A

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected combustion sources to demonstrate compliance with Conditions 5.5.1, pursuant to Section 39.5(7) (b) of the Act:

- a. The Permittee shall maintain records of natural gas usage in mmscf/mo and mmscf/year.
- b. The Permittee shall maintain records of emissions in tons/mo and tons/yr.

7.6.10 Reporting Requirements

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

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of any other exceedance with the emission limitation in the permit of the affected combustion sources with the permit requirements. These reports shall be submitted within 30 days of the exceedance and shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

- a. Emissions from the 12" reheat furnace shall be calculated using the following emission factors and equation.

PM (Lb/mmscf)	PM ₁₀ (Lb/mmscf)	NO _x (Lb/mmscf)	SO ₂ (Lb/mmscf)	VOM (Lb/mmscf)	CO (Lb/mmscf)
7.6	7.6	280	0.6	5.5	84

- Emissions (tons) = [(Natural Gas Usage (mmscf)) * (appropriate emission factor (lb/mmscf))]/2000 lb/ton

Emission factors are from the latest version of AP-42

- b. Emissions from the 7 ladle preheaters, 2 caster strand cutters, weld shop oven, tundish coating dryers, and torch cutters shall be calculated using the following emission factors and formula.

PM (Lb/mmscf)	PM ₁₀ (Lb/mmscf)	NO _x (Lb/mmscf)	SO ₂ (Lb/mmscf)	VOM (Lb/mmscf)	CO (Lb/mmscf)
7.6	7.6	100	0.6	5.5	84

- Emissions (tons) = [(Natural Gas Usage (mmscf)) * (appropriate emission factor (lb/mmscf))]/2000 lb/ton

Emission factors are from the latest version of AP-42

- c. Compliance with Condition 7.6.3 b. is assured by proper operation of the fuel combustion equipment.

7.7 Unit 07: 30 Metal Degreasing Stations
Control 07: None

7.7.1 Description

SSC utilizes 30 metal degreasing stations located throughout the facility to degrease metal. All stations are cold cleaning degreasers.

7.7.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
07	30 Metal Degreasing Stations	None

7.7.3 Applicability Provisions and Applicable Regulations

- a. The "affected degreasers" for the purpose of these unit-specific conditions, are the 30 degreasers listed in Condition 7.7.2.
- b. The affected degreasers are subject to 35 IAC 215.182 which states:
 - i. Operating Procedures: No person shall operate a cold cleaning degreaser unless:
 - A. 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:
 - B. The cover of the degreaser is closed when parts are not being handled; and
 - C. Parts are drained until dripping ceases.
 - ii. Equipment Requirements: No person shall operate a cold cleaning degreaser unless:
 - A. 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:
 - 1. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38 C (100 F)

2. The solvent is agitated; or
 3. The solvent is heated above ambient room temperature.
- B. 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:
1. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38 C (100 F): or
 2. An internal drainage facility cannot be fitted into the cleaning system, in which case the drainage facility may be external.
- C. 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:
1. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
 2. Any other equipment or system of equivalent emission control as approved by the Agency. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
- D. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
- E. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.

[35 IAC 215.182]

- c. The affected degreasers are subject to 35 IAC 215.301 which states:

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 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

[35 IAC 215.301]

7.7.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected degreaser 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.. [40 CFR 63.460(a)]

7.7.5 Operational and Production Limits and Work Practices

None

7.7.6 Emission Limitations

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

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

7.7.7 Testing Requirements

None

7.7.8 Monitoring Requirements

None

7.7.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected degreasers to demonstrate compliance with Conditions 5.5.1 and 7.7.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of solvent usage in gal/mo and gal/yr.
- b. The Permittee shall maintain records of emissions in tons/mo and tons/yr.
- c. The Permittee shall maintain records of solvent reclaimed and shipped off site in lb/mo and lb/yr.

7.7.10 Reporting Requirements

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

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of any other exceedance with the emission limitation in the permit of the affected degreasers with the permit requirements. These reports shall be submitted within 30 days of the exceedance and shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.7.12 Compliance Procedures

- a. Emissions shall be based on the recordkeeping requirements in Condition 7.7.9 and the formula listed below:
 - $$\text{VOM Emissions (tons)} = \{[(\text{Solvent Usage (gal)}) \times (\text{solvent density (lb/gal)}) \times (\text{VOM content (\%)})] / 2000 \text{ lb/ton}\} - \text{solvent reclaimed and shipped off site (tons)}$$

7.8 Unit 08: Gasoline Storage Tank
Control 08: None

7.8.1 Description

SSC utilizes one 1,000 gallon gasoline storage tank.

7.8.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
08	Gasoline Storage Tank (1,000 Gallon)	None

7.8.3 Applicability Provisions and Applicable Regulations

- a. The "affected tank" for the purpose of these unit-specific conditions, is the tank listed in Condition 7.8.2.
- b. The affected tank is subject to 35 IAC 215.122(b) which states:
 - i. 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, or unless such tank is a pressure tank as described in Section 215.121(a) or is fitted with a recovery system as described in Section 215.121(b) (2). [35 IAC 215.122 b)]

7.8.4 Non-Applicability of Regulations of Concern

None

7.8.5 Operational and Production Limits and Work Practices

None

7.8.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected tank is subject to the following:

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

7.8.7 Testing Requirements

None

7.8.8 Monitoring Requirements

None

7.8.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected tank to demonstrate compliance with Conditions 5.5.1 and 7.8.6, pursuant to Section 39.5(7) (b) of the Act:

- a. The Permittee shall maintain records of gasoline storage in gal/mo and gal/yr.
- b. The Permittee shall maintain records of emissions in tons/mo and tons/yr.
- c. The Permittee shall maintain records, showing the presence of the submerged pipe fill.

7.8.10 Reporting Requirements

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

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of any other exceedance with the emission limitation in the permit of the affected tank with the permit requirements. These reports shall be submitted within 30 days of the exceedance and shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.8.12 Compliance Procedures

- a. The Permittee shall use the latest version of the TANKS program for VOM emission calculations for working and breathing losses.

7.9 Unit 09: General Solvent Use
Control 09: None

7.9.1 Description

SSC utilizes solvent for equipment cleaning, area cleaning and as an anti-freeze agent.

7.9.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
09	General Solvent Use	None

7.9.3 Applicability Provisions and Applicable Regulations

- a. The "affected solvent operations" for the purpose of these unit-specific conditions, is the operations listed in Condition 7.9.2.
- b. The affected solvent operations are subject to 35 IAC 215.301 which states:

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 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material. [35 IAC 215.301]

7.9.4 Non-Applicability of Regulations of Concern

None

7.9.5 Operational and Production Limits and Work Practices

None

7.9.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected solvent operations are subject to the following:

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

7.9.7 Testing Requirements

None

7.9.8 Monitoring Requirements

None

7.9.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected solvent operations to demonstrate compliance with Conditions 5.5.1 and 7.9.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of solvent usage in gal/mo and gal/yr.
- b. The Permittee shall maintain records of emissions in tons/mo and tons/yr.
- c. The Permittee shall maintain MSD sheets on all solvent used at the facility showing VOM and HAP content.

7.9.10 Reporting Requirements

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

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of any other exceedance with the emission limitation in the permit of the affected solvent operations with the permit requirements. These reports shall be submitted within 30 days of the exceedance and shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.9.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.9.12 Compliance Procedures

- a. Emissions shall be based on the recordkeeping requirements in Condition 7.9.9 and the formula listed below:

- $$\text{VOM Emissions (tons)} = \{[(\text{Solvent Usage (gal)}) \times (\text{solvent density (lb/gal)}) \times (\text{VOM content (\%)})] / 2000 \text{ lb/ton}\} - \text{solvent reclaimed and shipped off site (tons)}$$

$$\text{HAP Emissions (tons)} = (\text{VOM Emissions (tons)}) \times (\text{Individual HAP percentage (\%)})$$

7.10 Unit 10: Cooling Tower #8
Control 10: None

7.10.1 Description

SSC utilizes several cooling towers at various locations in the facility for contact and non-contact cooling water. Small amount of emissions (drift) are emitted from the cooling towers.

7.10.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
10	Cooling Tower #8	None

7.10.3 Applicability Provisions and Applicable Regulations

- a. The "affected cooling towers" for the purpose of these unit-specific conditions, is the equipment listed in Condition 7.10.2.
- b. The affected cooling tower is subject to 35 IAC 212.321 which states:
 - i. Except as further provided in this Part, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.
 - ii. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

P = Process weight rate, in tons per hour

E = Allowable emission rate, in pounds per hour

For process weight rates up to 450 T/hr:

A 2.54

B 0.534

For process weight rates in excess of 450 T/hr:

A 24.8

B 0.16

[35 IAC 212.321]

7.10.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected cooling towers not being subject to 40 CFR Part 63, Subpart Q, Industrial Cooling Towers, because the cooling towers are not operated with chromium-based water treatment chemicals.

7.10.5 Operational and Production Limits and Work Practices

- a. The affected cooling tower shall not exceed the following material throughput limits:

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

7.10.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected cooling tower is subject to the following:

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

These limits are based on the usage limits in condition 7.10.5 and emission factors listed in Condition 7.10.12.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

The above limitations were established in Permit 00100084, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.10.7 Testing Requirements

None

7.10.8 Monitoring Requirements

- a. The Permittee shall perform monthly operational inspections of the equipment that is important to the performance of the affected cooling tower. Any deficiency shall be noted and proper maintenance performed.

7.10.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected cooling tower to demonstrate compliance with Conditions 5.5.1 and 7.10.6, pursuant to Section 39.5(7) (b) of the Act:

- a. The Permittee shall maintain records of hours of operation at the maximum throughput rate.
- b. The Permittee shall maintain records of emissions in lb/hr and tons/yr.

7.10.10 Reporting Requirements

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

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of any other exceedance with the emission limitation in the permit of the affected cooling tower with the permit requirements. These reports shall be submitted within 30 days of the exceedance and shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.10.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.10.12 Compliance Procedures

- a. Compliance with the emission limit shall be based on the recordkeeping requirements in Condition 7.10.9 and the emission factors and formulas listed below.

Pollutant	Emission Factor
PM ₁₀	0.008% (Wt.) of Water Flow

PM₁₀ Emission Rate (lb/hr) = [(0.00008) x (water flow rate 30,000 gal/min) x (1000 lb PM₁₀/10⁶ lbs drift) x (60 min/hr) (8.33 lb/gal)]

PM₁₀ Annual Emissions (tons) = [(PM₁₀ Emission Rate (lb/hr)) x (8,760 hr/yr)]/2,000 lb/ton)

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after May 19, 2003 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

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

- a. The changes do not violate applicable requirements;

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

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

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

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

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section
Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office
Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

iii. Illinois EPA - Air Permit Section

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.2 Attachment 2 - Guidance on Revising This Permit

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

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

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

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

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

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

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

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

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

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

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

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

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

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

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



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

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
Date received:	

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24. Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25. Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26. Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28. Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29. If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. 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. Authorized Signature:	
BY:	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.4 Attachment 4 - Guidance on Renewing This Permit

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

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

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

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

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

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

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

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

Mail renewal applications to:

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

MVH:psj