

FINAL DRAFT/PROPOSED CAAPP PERMIT
Calumet Steel Company
I.D. No.: 031045AAD
Application No.: 96030171
July 9, 2002

217/782-2113

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

PERMITTEE

Calumet Steel Company
Attn: John R. Dado
317 East 11th Street
Chicago Heights, Illinois 60411

Application No.: 96030171

I.D. No.: 031045AAD

Applicant's Designation:

Date Received: March 8, 1996

Operation of: Steel Mill

Date Issued:

Expiration Date²:

Source Location: 317 East 11th Street, Chicago Heights, Cook

Responsible Official: Joe A. Belk, Vice President of Operations

This permit is hereby granted to the above-designated Permittee to OPERATE a Steel Mill, 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 J. Knobloch at 217/782-2113.

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

DES:MJK:psj

cc: Illinois EPA, FOS, Region 1

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 thereunder, 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

Calumet Steel Company
317 East 11th Street
Chicago Heights, Illinois 60411
708-757-7300

I.D. No.: 031045AAD
Standard Industrial Classification: 3312, Steel Production

1.2 Owner/Parent Company

Calumet Steel Company
317 East 11th Street
Chicago Heights, Illinois 60411

1.3 Operator

Calumet Steel Company
317 East 11th Street
Chicago Heights, Illinois 60411

John R. Dado
708-757-7300

1.4 General Source Description

The Calumet Steel Company is located at 317 East 11th Street Chicago Heights, Illinois. The source manufactures rolled steel bars.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
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:

None

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

10,000 gallon underground diesel storage tank
6 billet grinders
6 cold cleaning degreasers
3 cutting torches
21 space heaters (diesel fired 250,000 BTU/Hr)
5 cooling towers

- 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)].

- 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	Electric Arc Furnace E,	1/1959	Baghouse BH-1
	Electric Arc Furnace F	1/1959	Baghouse BH-1
	2 Strand Continuous Caster	12/1999	Baghouse BH-1
02	Lime Silos	12/1958	Cartridge Collector CC-1
03	Ladle Preheaters	10/1984	None
	Tundish Preheaters	01/1966	None
04	Shot Blast Unit 1	12/1989	Filter F-1
	Shot Blast Unit 2	12/1989	Filter F-1
05	Car Bottom Furnace (Source 0010)	10/1989	None
	Car Bottom Furnace (Source 0013)	07/1996	None
	Reheat Furnace	1967	None
06	250 Gal Storage Tank		None
07	Fugitive PM from paved and unpaved roads, scrap preparation and handling	-	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of NO_x, PM, and VOM emissions.

5.1.2 This permit is issued based on the source not being a major source of HAPs.

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.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- 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.
 - c. This stationary source will be subject to 40 CFR Part 63, Subpart FFFFFF, National Emission Standards for Hazardous Air Pollutants for Integrated Iron and Steel Manufacturing. The Permittee shall comply with the applicable requirements of such regulation by the date(s) specified in such regulation and shall certify compliance with the applicable requirements of such regulation as part of the annual compliance certification required by 40 CFR Part 70 or 71 beginning in the year that compliance is required under a final and effective rule.
- 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 PM₁₀ Contingency Measure Plan

Should this stationary source, as defined in 35 IAC 212.700, become subject to the requirement to prepare and submit a contingency measure plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.703, then the owner or operator shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented in accordance with 35 IAC 212.704. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U, incorporated herein by reference.

5.2.9 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)	45.14
Sulfur Dioxide (SO ₂)	3.85
Particulate Matter (PM)	94.87
Nitrogen Oxides (NO _x)	40.36
HAP, not included in VOM or PM	2.45
TOTAL	186.67

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 General Records

None

5.6.3 Records for Specific Sub-Groups

N/A

5.6.4 Records for VOM and HAP Emissions

N/A

5.6.5 Records for Operating Scenarios

N/A

5.6.6 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 VOM 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 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

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

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

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

6.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 - Electric Arc Furnaces E and F, 2 Strand Continuous Caster
 Control 01 - Baghouse BH-1

7.1.1 Description

The facility utilizes two arc furnaces for the melting of scrap steel and a 2 strand continuous caster for casting the molten steel into steel bars.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	Electric Arc Furnace E Electric Arc Furnace F 2 Strand Continuous Caster	Baghouse BH-1 Baghouse BH-1 Baghouse BH-1

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected furnaces" for the purpose of these unit-specific conditions, is electric arc furnaces E and F listed in Condition 7.1.2.
- b. The "affected caster" for purpose of these unit-specific conditions is the 2 strand caster listed in Condition 7.1.2.
- c. The affected furnaces 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 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]

- d. The affected furnaces and affected caster are subject to 35 IAC 212.123 which states:
 - i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to Section 212.122 of this Subpart.

- ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period. [35 IAC 212.123]

- e. The affected furnaces are subject to 35 IAC 212.448 which states:

The total particulate emissions from meltdown and refining, charging, tapping, slagging, electrode port leakage and ladle lancing shall not exceed the allowable emission rate specified by Section 212.321 or 212.322 of this Part, whichever is applicable. [35 IAC 212.448]

- f. The affected furnaces are subject to 35 IAC 212.322 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 process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.

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

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

Where:

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 Calumet Steel Company
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 Application No.: 96030171
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P = process weight rate; and,

E = allowable emission rate; and,

- A. For process weight rates up to 27.2 Mg/hr
 (30 T/hr)

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

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

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

[35 IAC 212.322]

- g. The affected caster 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; and
 E = Allowable emission rate; and,

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

	Metric	English
P	Mr/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

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

	Metric	English
P	Mr/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

[35 IAC 212.321]

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected furnaces not being subject to the New Source Performance Standards (NSPS) for Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels, 40 CFR Part 60, Subpart AAa, because the affected furnaces were constructed prior to August 17, 1983.

7.1.5 Operational and Production Limits and Work Practices

a. Operation of the affected continuous caster shall not exceed 10,600 ton/mo and 106,000 ton/yr of steel cast.

7.1.6 Emission Limitations

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

Emissions from the affected continuous caster shall not exceed the following limits:

Pollutant	Emissions (ton/mo)	Emissions (ton/yr)
NO _x	0.3	2.65

The above limitations were established in Permit 99090068, 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].

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].

7.1.7 Operating Requirements

- a. The Permittee shall maintain an operating and maintenance log for the baghouse which includes maintenance activities, with inspection schedule, repair actions, and replacements.

7.1.8 Inspection Requirements

- a. The Permittee shall maintain an operating and maintenance log for the baghouse which includes maintenance activities, with inspection schedule, repair actions, and replacements.

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 and caster to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the amount of steel produced in tons/mo and tons/yr.
- b. The Permittee shall maintain records of the amount of baghouse dust disposed of in tons/mo and tons/yr.

- c. The Permittee shall maintain records of the baghouse dust analysis.
- d. The Permittee shall maintain the hours of operation of the arc furnaces and caster in hr/mo and hr/yr.
- e. The Permittee shall maintain records of emissions in ton/mo and ton/yr.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected furnaces and caster 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. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Agency's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

PM Emission Calculations From Baghouse BH-1 (inclusive equipment: Arc Furnaces E and F and Continuous Caster

PM Emissions (tons) = [(29.98 (lb/hr)) * (hours of operation (hr))]/2000 lb/ton

Emission rate originates from the baghouse monovent exhaust stack test dated 10-3-92 (after control).

NO_x, SO_x, and VOM Emission Calculations For Arc Furnaces E and F

Emissions (tons) = [(steel produced (tons)) * (appropriate emission factor (lb /ton steel))]/2000 Lb/ton

Pollutant	Emission Factor (Lb/ton)
NO _x	0.20
SO _x	0.07
VOC	0.35

NO_x and SO_x emission factors are from Steel prod., JACA Corp., Sept 86, Iron and Steel test

VOM emission factor is from Steel prod., AP-42, Sept 85, vol 1, 4th edition.

HAP Metal Emission Calculations For Arc Furnaces E and F

Emissions (tons) = [(PM Emissions (tons)) * (concentration of HAP Metal(%))/100]/2000 lb/ton

Metal	Concentration of HAP Metal (%)
Lead	2.43
Cadmium	0.095
Manganese	2.67
Chromium	0.14
Nickel	0.027
Arsenic	0.0054

NO_x Emission Calculations for the Continuous Caster

Emissions (tons) = [(steel cast (tons)) * (.05 (lb NO_x/ton))]/2000 lb/ton

The emission factor for NO_x emissions from the continuous casting operation can be found in the FIRE Version 5.0, August 1995.

7.2 Unit 02 - Lime Silos
 Control 02 - Cartridge Collector CC-1

7.2.1 Description

The facility utilizes silos for the storage of lime which is used in the production of steel.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
02	Lime Silos	Cartridge Collector CC-1

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected silos" for the purpose of these unit-specific conditions, is the emission unit listed in Condition 7.2.2.
- b. The affected silos are subject to 35 IAC 212.123 which states:
 - i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to Section 212.122 of this Subpart.
 - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period. [35 IAC 212.123]
- c. The affected silos are subject to 35 IAC 212.322 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 process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.
- ii. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

P = process weight rate; and,

E = allowable emission rate; and,

- A. For process weight rates up to 27.2 Mg/hr (30 T/hr)

	Metric	English
P	Mr/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

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

	Metric	English
P	Mr/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

[35 IAC 212.322]

7.2.4 Non-Applicability of Regulations of Concern

None

7.2.5 Operational and Production Limits and Work Practices

None

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:

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

7.2.7 Operating Requirements

None

7.2.8 Inspection Requirements

None

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 Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the amount of lime used in tons/mo and tons/yr.
- b. The Permittee shall maintain records of emissions in ton/mo and ton/yr.

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. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Agency's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

PM Calculations For Lime Silo Operations

PM Emissions (tons) = [(Lime Used (tons)) * (appropriate emission factor (lb/ton)) * (1 - control efficiency*(%)/100)]/2000 Lb/ton

Operation	Emission Factor (Lb/ton)
Unloading	0.03
Loading onto Pile	0.04
Handling and Transfer	0.8

Emission Factors are from OEPA Document - Reasonably Available Control Measures for Fugitive Dust Sources, Sept 1980.

* Only applicable for Loading onto pile

7.3 Unit 03 - Ladle Preheaters and Tundish Preheaters
 Control 03 - None

7.3.1 Description

Ladles and tundishes are preheated to prevent thermal shock prior to the introduction of molten steel.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
03	Ladle Preheaters	None
	Tundish Preheaters	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected ladle preheaters" for the purpose of these unit-specific conditions, is the emission unit listed in Condition 7.3.2.
- b. The "affected tundish preheaters" for the purpose of these unit-specific conditions, is the emission unit listed in Condition 7.3.2.
- c. The affected ladle preheaters and affected tundish preheaters are subject to 35 IAC 212.123 which states:
 - i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to Section 212.122 of this Subpart.
 - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted

from each such emission unit shall be limited to 3 times in any 24 hour period. [35 IAC 212.123]

- d. The affected ladle preheaters and tundish preheaters 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 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]

7.3.4 Non-Applicability of Regulations of Concern

The affected ladle preheaters and tundish preheaters are not subject to 35 IAC 217.141 because the firing rates are less than 250 mmBtu/hr.

7.3.5 Operational and Production Limits and Work Practices

None

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 preheaters are subject to the following:

Emissions from the affected ladle preheaters shall not exceed the following limits:

Pollutant	Emissions (ton/yr)
NO _x	0.73
CO	0.15
PM	0.09
VOM	0.04

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) [T1N].

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The Illinois EPA has establish emission limitations and other appropriate terms

and conditions in this permit that limit the PM, VOM, CO, and NO_x emissions from the affected ladle preheaters below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

7.3.7 Operating Requirements

None

7.3.8 Inspection Requirements

None

7.3.9 Recordkeeping Requirements

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

- a. The Permittee shall maintain records of the amount of natural gas consumed in mmscf/mo and mmscf/yr.
- b. The Permittee shall maintain records of emissions in ton/mo and ton/yr.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected ladle and tundish preheaters 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. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Agency's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Emission Calculations For Ladle and Tundish Preheaters

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

Pollutant	Emission Factor (Lb/mmscf)
PM	12.36
PM ₁₀	12.36
SO ₂	0.618
NO _x	103.0
CO	21.63
VOM	5.44

Emission Factors are obtained from USEPA AP-42, fifth edition.

7.4 Unit 04 - Shot Blast Units 1 and 2
 Control 04 - Filter F-1

7.4.1 Description

The facility utilizes shot blast units to provide the required texture/luster to the steel bars.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
04	Shot Blast Units (Descaler) 1 and 2	Filter F-1

7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected shot blast units" for the purpose of these unit-specific conditions, is the emission unit listed in Condition 7.4.2.
- b. The affected shot blast units are subject to 35 IAC 212.123 which states:
 - i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to Section 212.122 of this Subpart.
 - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period. [35 IAC 212.123]
- c. The affected shot blast units are subject to 35 IAC 212.681 which states:

Sections 212.321 and 212.322 of this Part shall not apply to the following industries, which shall be subject to Subpart K of this Part:

- i. Grinding
- ii. Woodworking
- iii. Sandblasting or shotblasting

[35 IAC 212.681]

7.4.4 Non-Applicability of Regulations of Concern

None

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 shot blast units are subject to the following:

PM emissions from the affected shot blast units shall not exceed the following limits:

Emission Unit	Emissions (ton/yr)
Shot Blast 1	0.44
Shot Blast 2	0.44

The above limitations were established in Permit 89120024, 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].

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].

7.4.7 Operating Requirements

None

7.4.8 Inspection Requirements

None

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 shot blast units to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall maintain records of the amount of shot used in tons/mo and tons/yr.

b. The Permittee shall maintain records of emissions in ton/mo and ton/yr.

7.4.10 Reporting Requirements

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

a. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Agency's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

PM and PM₁₀ Calculations For Shot Blast Units

PM Emissions (tons) = [(Shot Used (tons)) * (.004 (lb/lb shot))]/2000 Lb/ton

PM₁₀ Emissions (tons) = (PM Emissions (tons)) * (.86)

Emission Factors are from a handbook for regulators and industry STAPPA/ALAPCO

7.5 Unit 05 - Car Bottom Annealing Furnaces, Reheat Furnace
 Control 05 - None

7.5.1 Description

Two car bottom furnaces are used to impart certain metallurgical properties into the steel bars. Cooled billets are placed in the reheat furnace to obtain optimal temperature prior to rolling into steel bars.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
05	Car Bottom Annealing Furnace (Source 0010)	None
	Car Bottom Annealing Furnace (Source 0013)	None
	Reheat Furnace	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. The "affected car bottom furnaces" for the purpose of these unit-specific conditions, is the emission unit listed in Condition 7.5.2.
- b. The "affected reheat furnace" for the purpose of these unit-specific conditions, is the emission unit listed in Condition 7.5.2.
- c. The affected car bottom furnaces and reheat furnace are subject to 35 IAC 212.123 which states:
 - i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to Section 212.122 of this Subpart.
 - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions

permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period. [35 IAC 212.123]

- d. The affected car bottom furnaces and reheat furnace 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 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]

7.5.4 Non-Applicability of Regulations of Concern

The affected car bottom furnaces and reheat furnaces are not subject to 35 IAC 217.141 because the firing rates are less than 250 mmBtu/hr.

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 car bottom furnaces (source 0010) is subject to the following:

Emissions from the affected car bottom furnaces (source 0010) shall not exceed the following limits:

Pollutant	Emissions (ton/yr)
NO _x	1.1
CO	0.3

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 89100038, 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 car bottom furnace (source 0013) shall not exceed the following limits:

Pollutant	Emissions (ton/yr)
NO _x	4.25
CO	0.92

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 96050049, 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 Operating Requirements

- a. The maximum hours of operation for car bottom furnace (source 0010) is 6,000 hours/yr.
- b. Natural gas shall be the only fuel fired in the car bottom furnace (source 0013).

7.5.8 Inspection 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 car bottom furnaces and reheat furnace to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the amount of natural gas consumed in mmscf/mo and mmscf/yr for the car bottom furnaces and reheat furnace.
- b. The Permittee shall maintain records of emissions in ton/mo and ton/yr.
- c. The Permittee shall maintain record for the hours of operation for car bottom furnace (source 0010) in hr/yr.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected car bottom furnaces and reheat 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. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Agency's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

Emission Calculations For Car Bottom Furnaces

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

Pollutant	Emission Factor (Lb/mmscf)
PM	12.36
PM ₁₀	12.36
SO ₂	0.618
NO _x	103.0
CO	21.63
VOM	5.44

Emission Factors are obtained from USEPA AP-42, fifth edition.

Emission Calculations For Reheat Furnace

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

Pollutant	Emission Factor (Lb/mmscf)
PM	3.09
PM ₁₀	3.09
SO ₂	.618
NO _x	144.20
CO	41.20
VOM	1.45

Emission Factors are obtained from USEPA AP-42, fifth edition.

7.6 Unit 06 - Gasoline Storage Tank
 Control 06 - None

7.6.1 Description

Gasoline is stored in 250 gallon horizontal aboveground tanks.

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
06	250 gal gasoline storage tank	None

7.6.3 Applicability Provisions and Applicable Regulations

- a. The "affected gasoline storage tank" for the purpose of these unit-specific conditions, is the emission units listed in Condition 7.6.2.
- b. The affected gasoline storage 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)]

7.6.4 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 gasoline storage tanks 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

None

7.6.8 Monitoring Requirements

None

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 gasoline storage tanks to demonstrate compliance with 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain monthly and annual records of gasoline throughput to the tank (gal/mo and gal/yr).
- b. The Permittee shall maintain monthly and annual records of emissions for the tank (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 gasoline storage 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. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Agency's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance

with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

For the purpose of estimating VOM emissions from the affected storage tank, the current version of the tanks program is acceptable.

7.7 Unit 07 - Fugitive Emissions
 Control 07 - None

7.7.1 Description

Fugitive emissions are generated by travel over paved and unpaved roads, scrap preparation and handling, storage piles, and slag handling.

7.7.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
07	Paved roads	Sweeping
	Unpaved roads	Watering
	Scrap preparation and Handling	None
	Scale storage piles	None
	Slag Handling	None

7.7.3 Applicability Provisions and Applicable Regulations

- a. The "affected fugitive emission sources" for the purpose of these unit-specific conditions, is the emission unit listed in Condition 7.7.2.
- b. Fugitive dust from paved and unpaved roads, and storage piles are subject to 35 IAC 212.316(c) and (d) which states:
 - i. Emission Limitations for Roadways or Parking Areas. No person shall cause or allow fugitive particulate matter emissions from any roadway or parking area to exceed an opacity of 10 percent, except that the opacity shall not exceed 5 percent at quarries with a capacity to produce more than 1 million T/yr of aggregate.
 - ii. Emission Limitations for Storage Piles. No person shall cause or allow fugitive particulate matter emissions from any storage pile to exceed an opacity of 10 percent, to be measured four ft from the pile surface. [35 IAC 212.316]

- c. The affected fugitive emissions are subject to 35 IAC 212.309 which states:
 - i. The emission units described in Sections 212.304 through 212.308 and Section 212.316 of this Subpart shall be operated under the provisions of an operating program, consistent with the requirements set forth in Sections 212.310 and 212.312 of this Subpart, and prepared by the owner or operator and submitted to the Agency for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
 - ii. The amendment to this Section incorporating the applicability of Section 212.316 shall apply by may 11, 1993, or upon initial start-up, whichever occurs later. [35 IAC 212.309]
- d. The affected fugitive emissions from scrap preparation and handling are subject to 35 IAC 212.123 which states:
 - i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to Section 212.122 of this Subpart.
 - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period. [35 IAC 212.123]

- e. The affected fugitive emissions from scrap preparation and handling 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 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]

- f. The affected fugitive emission sources are subject to 35 IAC 212.301 which states:

No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source. [35 IAC 212.301]

7.7.4 Non-Applicability of Regulations of Concern

None

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 fugitive emission 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.

7.7.7 Operating Requirements

None

7.7.8 Inspection 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 fugitive emission sources to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Fugitive dust from paved and unpaved roads are subject to 35 IAC 212.316(g) which states:
 - i. Recordkeeping and Reporting
 - A. The owner or operator of any fugitive particulate matter emission unit subject to this Section shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of this Section and shall submit to the Agency an annual report containing a summary of such information.
 - B. The records required under this subsection shall include at least the following:
 1. The name and address of the source:
 2. The name and address of the owner and/or operator of the source:
 3. A map or diagram showing the location of all emission units controlled, including the location, identification, length, and width of roadways:
 4. For each application of water or chemical solution to roadways by truck: the name and location of the roadway controlled, application rate of each truck, frequency of each application, width of each application, identification of each truck used, total quantity of water or chemical used for each application and, for each application of chemical solution,

the concentration and identity of the chemical.

5. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent, and, if diluted, percent of concentration, used each day: and
- F) A log recording incidents when control measures were not used and a statement of explanation.
- C. Copies of all records required by this Section shall be submitted to the Agency within ten (10) working days after a written request by the Agency and shall be transmitted to the Agency by a company-designated person with authority to release such records.
- D. The records required under this Section shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Agency representatives during working hours.
- E. A quarterly report shall be submitted to the Agency stating the following: the dates any necessary control measures were not implemented, a listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of this Section. This report shall be submitted to the Agency thirty (30) calendar days from the end of a quarter, Quarters end March 31, June 30, September 30, and December 31. [35 IAC 212.316 (g)]

- b. The Permittee shall maintain records of the approximate miles traveled on the paved and unpaved roads in mi/mo for the different types of vehicles.
- c. The Permittee shall maintain records of the amount of slag handled in ton/mo and ton/yr.
- d. The Permittee shall maintain records of emissions in ton/mo and ton/yr.
- e. The Permittee shall maintain records of scrap handled in ton/mo and ton/yr.

7.7.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected fugitive emission 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. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Agency's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.7.12 Compliance Procedures

PM and PM₁₀ Emission Calculations For Slag Handling

PM Emissions (tons) = [(Slag handled (ton)) * (0.1 (lb/ton))]/2000 Lb/ton

PM₁₀ = PM Emissions (tons) * 0.6

Emission Factor obtained from OEPA Document-Reasonably Available Control Measures For Fugitive Dust Sources, September 1980.

PM Emissions from Paved Roads (North)

North PM Emissions (tons) = [(Vehicle miles traveled (mi)) * (appropriate emission factor (lb/vmt)) * (1 - control efficiency(%)/100)]/2000 lb/ton

Appropriate Emission Factor

Type of Vehicle	PM Emission Factor (lb/vmt)
Cars	0.04
18 Wheelers	5.51
Scrap trucks	6.18
Fork trucks	4.86
Caterpillar	0.35

All factors are derived using the equations in AP-42, 5th Edition and the following constants.

K (Particle Size Multiplier) = 0.082
 sL (Silt Loading) = 9.7
 W (average weight, tons) = 1 (cars)
 = 25 (18 Wheelers)
 = 27 (Scrap Trucks)
 = 23 (Fork Trucks)
 = 4 (Caterpillar)
 % control (sweeping) = 70%

PM Emissions from Paved Roads (South)

South PM Emissions (tons) = [(Vehicle miles traveled (mi)) * (appropriate emission factor (lb/vmt)) * (1 - control efficiency(%)/100)]/2000 lb/ton

Appropriate Emission Factor

Type of Vehicle	PM Emission Factor (lb/vmt)
Cars	0.04
Trucks	0.12
Fork trucks	4.86
Towmotor	0.35

All factors are derived using the equations in AP-42, 5th Edition and the following constants.

K (Particle Size Multiplier) = 0.082
 sL (Silt Loading) = 9.7
 W (average weight, tons) = 1 (cars)
 = 2 (trucks)
 = 23 (Fork Trucks)
 = 4 (Towmotor)
 % control (sweeping) = 70%

PM₁₀ Emissions from Paved Roads (North)

North PM₁₀ Emissions (tons) = [(Vehicle miles traveled (mi)) * (appropriate emission factor (lb/vmt)) * (1 - control efficiency(%)/100)]/2000 lb/ton

Appropriate Emission Factor

Type of Vehicle	PM Emission Factor (lb/vmt)
Cars	0.01
18 Wheelers	1.07
Scrap trucks	1.21
Fork trucks	0.95
Caterpillar	0.07

All factors are derived using the equations in AP-42, 5th Edition and the following constants.

K (Particle Size Multiplier) = 0.016
 sL (Silt Loading) = 9.7
 W (average weight, tons) = 1 (cars)
 = 25 (18 Wheelers)
 = 27 (Scrap Trucks)
 = 23 (Fork Trucks)
 = 4 (Caterpillar)
 % control (sweeping) = 70%

PM₁₀ Emissions from Paved Roads (South)

South PM₁₀ Emissions (tons) = [(Vehicle miles traveled (mi)) * (appropriate emission factor (lb/vmt)) * (1 - control efficiency(%)/100)]/2000 lb/ton

Appropriate Emission Factor

Type of Vehicle	PM Emission Factor (lb/vmt)
Cars	0.01
Trucks	0.02
Fork trucks	0.95
Towmotor	0.07

All factors are derived using the equations in AP-42, 5th Edition and the following constants.

K (Particle Size Multiplier) = 0.016
 sL (Silt Loading) = 9.7
 W (average weight, tons) = 1 (cars)
 = 2 (trucks)
 = 23 (Fork Trucks)
 = 4 (Towmotor)
 % control (sweeping) = 70%

PM Emissions from Unpaved Roads (North)

North PM Emissions (tons) = [(Vehicle miles traveled (mi))
 * (appropriate emission factor (lb/vmt)) * (1 - control
 efficiency(%)/100)]/2000 lb/ton

Appropriate Emission Factor

Type of Vehicle	PM Emission Factor (lb/vmt)
Cars	0.66
18 Wheelers	9.26
Scrap trucks	8.62
Dump trucks	4.37
Fork Truck	5.05

All factors are derived using the equations in AP-42, 5th Edition and the following constants.

K (Particle Size Multiplier) = 1.0
 s (Silt Constant) = 6.0
 S (Mean Vehicle Speed) = 15 mph
 W (average weight, tons) = 1 (cars)
 = 25 (18 Wheelers)
 = 27 (Scrap Trucks)
 = 25 (Dump Trucks)
 = 23 (Fork Truck)

w (Number of Wheels) = 4 (Cars)
 = 18 (18 Wheelers)
 = 14 (Scrap Truck)
 = 4 (Dump Truck)
 = 6 (Fork Truck)

P (Precipitation Days) = 120 days
 % control (watering) = 50%

PM Emissions from Unpaved Roads (South)

South PM Emissions (tons) = [(Vehicle miles traveled (mi)) * (appropriate emission factor (lb/vmt)) * (1 - control efficiency (%)/100)]/2000 lb/ton

Appropriate Emission Factor

Type of Vehicle	PM Emission Factor (lb/vmt)
Cars	0.46
Trucks	0.75
Towmotor	1.21
Fork Truck	5.05

All factors are derived using the equations in AP-42, 5th Edition and the following constants.

K (Particle Size Multiplier) = 1.0
 s (Silt Constant) = 6.0
 S (Mean Vehicle Speed) = 15 mph
 W (average weight, tons) = 1 (Cars)
 = 2 (Trucks)
 = 4 (Towmotor)
 = 23 (Fork Truck)

w (Number of Wheels) = 4 (Cars)
 = 4 (Trucks)
 = 4 (Towmotor)
 = 6 (Fork Truck)

P (Precipitation Days) = 120 days

% control (watering) = 50%

PM₁₀ Emissions from Unpaved Roads (North)

North PM₁₀ Emissions (tons) = [(Vehicle miles traveled (mi)) * (appropriate emission factor (lb/vmt)) * (1 - control efficiency (%)/100)]/2000 lb/ton

Appropriate Emission Factor

Type of Vehicle	PM Emission Factor (lb/vmt)
Cars	0.17
18 Wheelers	3.34
Scrap trucks	3.10
Dump trucks	1.57
Fork Truck	1.82

All factors are derived using the equations in AP-42, 5th Edition and the following constants.

K (Particle Size Multiplier) = .36
 s (Silt Constant) = 6.0
 S (Mean Vehicle Speed) = 15 mph
 W (average weight, tons) = 1 (cars)
 = 25 (18 Wheelers)
 = 27 (Scrap Trucks)
 = 25 (Dump Trucks)
 = 23 (Fork Truck)

w (Number of Wheels) = 4 (Cars)
 = 18 (18 Wheelers)
 = 14 (Scrap Truck)
 = 4 (Dump Truck)
 = 6 (Fork Truck)

P (Precipitation Days) = 120 days
 % control (watering) = 50%

PM₁₀ Emissions from Unpaved Roads (South)

South PM₁₀ Emissions (tons) = [(Vehicle miles traveled (mi)) * (appropriate emission factor (lb/vmt)) * (1 - control efficiency(%)/100)]/2000 lb/ton

Appropriate Emission Factor

Type of Vehicle	PM Emission Factor (lb/vmt)
Cars	0.17
Trucks	0.27
Towmotor	0.44
Fork Truck	1.82

All factors are derived using the equations in AP-42, 5th Edition and the following constants.

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 _____ **{insert public notice start date}** (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].

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:

FINAL DRAFT/PROPOSED CAAPP PERMIT
Calumet Steel Company
I.D. No.: 031045AAD
Application No.: 96030171
July 9, 2002

- i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016
 - iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
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

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- 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
	ID 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. ID 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	
<p>This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.</p>	
<p>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:</p>	
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.

10.5 Attachment 5 Guidance on Renewing This Permit

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

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

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

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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.

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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