

217/782-2113

JOINT CONSTRUCTION AND OPERATING PERMIT -- REVISED

PERMITTEE

Wheatland Tube Company, Chicago Division  
Attn: Ron Bennett, Plant Manager  
4435 South Western Boulevard  
Chicago, Illinois 60609

Application No.: 96110025

I.D. No.: 031600FDI

Applicant's Designation: Mill #3

Date Received: December 26, 2000

Subject: Continuous Galvanizing Mill

Date Issued: May 30, 2001

Operating Permit Expiration

Date: June 15, 2004

Location: 2300 West 47th Street, Chicago

Permit is hereby granted to the above-designated Permittee to CONSTRUCT and OPERATE emission source(s) and/or air pollution control equipment consisting of a Continuous Production Steel Tube Mill (Mill #3), including interior and exterior coating and galvanizing as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

Findings

- 1a. Wheatland Tube Company recently expanded its Chicago metal tube manufacturing plant with new mill (Mill #3) which includes a galvanizing system, paint stations, associated scrubbers, and cyclone dust collector systems and related ancillary equipment.
- b. The mill is currently required to use VOM free coatings for all exterior coating. This revision would allow Wheatland to use some coating containing volatile organic material (VOM) (up to 0.7 lb/gal) on the outside of tubing, as requested by certain customers. Emissions from these special non-UV coatings comprise only a small percentage of the emissions generated by this project. This revision would not increase the annual VOM emissions allowed by the permit.
2. Wheatland is located in an area that is designated nonattainment for ozone and this new mill was subject to 35 IAC 203: Major Stationary Sources Construction and Modification (MSSCAM) because the potential emissions of volatile organic material (VOM) would exceed 25 tons/year. Accordingly the new mill was subject to a requirement that if emissions increases exceeded 25 tons/year, offsets and Lowest Achievable Emission Rate (LAER) are required.
3. After reviewing all materials submitted by Wheatland, the Illinois EPA has determined that use of a small amount of very low VOM coating, as proposed, still satisfies the requirement for the Lowest Achievable Emission Rate (LAER), pursuant to MSSCAM.

4. A copy of the application and the Illinois EPA's review of the application and a draft of the revised permit was forwarded to a location in the vicinity of the plant, and the public was given notice and opportunity to examine this material, to submit comments, and if necessary to request a public hearing on this matter.

Conditions

1. Standard conditions for issuance of construction and operating permits attached hereto and incorporated herein by reference shall apply to this project, unless superseded by the following special conditions.
- 2a. The volatile organic material (VOM) content of each coating, used in Mill #3 for the interior of tubes, as applied shall not exceed the following limits. These limits are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied.
  - i. 1.8 lb VOM/gal for electrical metallic tubing (conduit) with outside diameters less than or equal to 2.0 inches.
  - ii. 2.6 lb VOM/gal for other tubing.
- b.
  - i. Except as provided below in (iii), the coatings used on Mill #3 for the exterior of tubes shall be UV cure coatings and powder coatings;
  - ii. Clear water-based coatings that contains less than 1.0 lb/gal VOM, provided that the annual VOM emissions from the use of clear water-based exterior coatings shall not exceed 3.3 tons/year.
- c. The Permittee shall not use any cleanup material at the ID coating station on Mill #3 that contains VOM.

Condition 2 represents the Lowest Achievable Emission Rate (LAER) as applied to this project, pursuant to 35 IAC 203.301.
3. The total annual emissions of VOM from Mill #3 shall not exceed 76 tons/year. Compliance with this limit shall be determined from a running total of 12 months of data.
4. Emissions of particulate matter from Mill #3 shall not exceed 1.62 lb/hour and 7.1 ton/yr.
- 5a.
  - i. The Permittee shall analyze representative samples of coating materials for VOM content using the procedures specified by 35 IAC 218.105(a). The presence of exempt organic compounds, e.g., acetone, in a coating material shall be determined by manufacturer's data unless an analytical method is approved by USEPA for such purpose. Actual analysis may be conducted by the Permittee, supplier of such coating, or an independent third party laboratory.

- ii. The Permittee shall keep detailed records as outlined in 5(a)(i) for this sampling and analysis.
- b.
  - i. A comprehensive sampling and analysis program shall be conducted within 180 days of startup of Mill #3 to review all interior coatings on the mill.
  - ii. On at least an annual basis thereafter, sampling and analysis shall be conducted for any new supplier of interior coatings or significant changes in coatings provided by current suppliers.
- c.
  - i. The Permittee shall provide a written report to the Illinois EPA within 200 days of startup of Mill #3 that provides the results of testing required by Condition 5(b)(i) and addresses compliance with Condition 2.
  - ii. The Permittee shall only provide a written report to the Illinois EPA for the results of testing required by Condition 5(b)(ii) if it indicates noncompliance with Condition 2, in which case the report shall be submitted within 30 days of receiving the analytical results.
- d. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- 6a. The Permittee shall collect and record the following items each day for Mill #3, pursuant to 35 IAC 218.211(b)(2):
  - i. A list giving the name and identification number of each coating as applied, dilution solvent, clean-up solvent, and any other material used containing VOM.
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempt from the definition of VOM) as applied each day on mill 3.
- b. The Permittee shall supplement the above records with data on the type of tubing to which a coating was applied, i.e., electrical tubing or other type of tubing, so as to address compliance with the categorical limits in Condition 2(a).
- c. The Permittee shall collect and record the following items for coating materials used on Mill #3 that contain VOM.
  - i. VOM content in lb VOM/gal of material and weight percent.
  - ii. Other information on the composition of the material e.g., density in pounds per gallon, fraction water, fraction exempt

compounds, etc., as necessary to calculate VOM content less water and exempt compounds.

- iii. VOM content, less water and exempt compounds, with supporting calculations.
  - iv. The type of tubing for which a coating is used.
  - v. A copy of the MSDS or other document.
- d. The Permittee shall collect the following information for Mill #3 on a monthly basis.
- i. Actual usage of coatings, solvent and any other material used containing VOM in ton/month.
  - ii. Emissions of VOM, in tons per month, with supporting calculations.
  - iii. Emissions of VOM in tons per year.
  - iv. Any changes in the types of coatings applied to the exterior of tubes as related to compliance with Condition 2(b).
  - v. Any changes in the practices for cleanup of the interior coatings on Mill #3 as related to compliance with Condition 2(c) above.
- e. The Permittee shall keep all the maintenance records of control equipment, pursuant to Condition 5(d).
- f. The Permittee shall maintain records that identify each occurrence when Mill #3 was not in compliance with the emission limitations or operating requirements of this permit.
- g. All records required by this permit shall be retained for five years at a readily accessible location at the source and shall be available to the Illinois EPA for inspection or copying upon request. Computerized records shall be printed upon request.
7. Any record showing a violation of the conditions of this permit shall be reported by sending a copy of such record to the Illinois EPA Compliance Section within 30 days following the occurrence of the violation.
8. Two (2) copies of required reports and notifications concerning equipment operation and material testing shall be sent to:

Illinois Environmental Protection Agency (MC 40)  
Division of Air Pollution Control  
Compliance Section  
Post Office Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

- 9a. The Permittee shall maintain 98.8 tons of VOM emission offsets for Mill #3, which shall be provided from the City of Chicago's Offset Reserve\*, unless this permit is revised to allow offsets to be provided from other sources in the Chicago nonattainment area or the amount of offset emissions is reduced. As a result, the total amount of offsets is 1.3 times the VOM emissions allowed from this project, pursuant to Condition 3.

\* Construction of this Mill #3 will lower the amount of offsets in the City of Chicago's reserve by 98.8 tons, except as provided above.

Condition 9 represents those actions which must be taken to ensure that the project will not interfere with reasonable further progress.

- b. Construction of Mill #3 shall not begin until offsets have been secured from the City of Chicago.
10. This approval to construct and operate does not relieve the Permittee of the responsibility to comply with all local, state, and federal regulations which are part of the applicable Illinois State Implementation Plan, as well as all other applicable federal, state, and local requirements.

This permit has been revised to allow the use of a small quantity of very low VOM-content coatings on Mill #3 (See Condition 2(b)), without altering the annual VOM limit of 76 tons/year (See Condition 3). The Permittee is never the less required to incorporate these conditions into their Title V permit.

If you have any questions on this permit, please call Bob Smet at 217/782-2113.

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

DES:RPS:psj

cc: Region 1