Attention:

Phoenix Services, Inc.
Attn: Clint McGinty
148 West State Street, Suite 301
Kennett Square, Pennsylvania 19348

State of Illinois

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Source:

Phoenix Services LLC.
13500 South Perry Avenue
Riverdale, Illinois 60827

I.D. No.: 031258AAS
Permit No.: 07080049

Permitting Authority:

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

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR LISA BONNETT, DIRECTOR

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Type of Application:	New
Purpose of Application:	Issue New Permit to an Existing Major Source
ID No.:	031258AAS
Permit No.:	07080049
Statement of Basis No.:	07080049-1408
Date Application Received:	August 21, 2007
Date Issued:	October 23, 2014
Expiration Date:	October 23, 2019
Renewal Submittal Date:	9 Months Prior to Expiration Date
Source Name:	Phoenix Services LLC
Address:	13500 South Perry Ave
City:	Riverdale
County:	Cook
ZIP Code:	60827

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

If you have any questions concerning this permit, please contact Ross Cooper or Doug Rutherford at 217/785-1705.

Raymond E, Pilapil

Raymond E, Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

REP:MTR:RWC:DLR:jws

cc: IEPA, Permit Section
IEPA, FOS, Region 1
Lotus Notes Databasel

Table of Contents

Section		Page
1	**Source Information**	3
	1.1 Addresses	
	1.2 Contacts	
	1.3 Single Source	
2	**General Permit Requirements**	4
	2.1 Prohibitions	
	2.2 Emergency Provisions	
	2.3 General Provisions	
	2.4 Testing	
	2.5 Recordkeeping	
	2.6 Certification	
	2.7 Permit Shield	
	2.8 Title I Conditions	
	2.9 Reopening and Revising Permit	
	2.10 Emissions Trading Programs	
	2.11 Permit Renewal	
	2.12 Permanent Shutdown	
	2.13 Startup, Shutdown, and Malfunction	
3	**Source Requirements**	12
	3.1 Applicable Requirements	
	3.2 Applicable Plans and Programs	
	3.3 Title I Requirements	
	3.4 Synthetic Minor Limits	
	3.5 Reporting Requirements	
4	**Emission Unit Requirements**	17
	4.1 Material Handling and Processing Operations	
	4.2 Fugitive PM Emissions	
5	**Additional Title I Requirements**	32
6	**Insignificant Activities Requirements**	33
	6.1 Insignificant Activities Subject to Specific Regulations	
	6.2 Insignificant Activities in 35 IAC 201.210(a)	
	6.3 Insignificant Activities in 35 IAC 201.210(b)	
	6.4 Applicable Requirements	
	6.5 Compliance Method	
	6.6 Notification Requirements for Insignificant Activities	
7	**Other Requirements**	36
	7.1 Testing	
	7.2 PM Process Weight Rate Requirements	
8	**State Only Requirements**	39
	8.1 Permitted Emissions for Fees	
Attachment 1	**List of Emission Units at This Source**	40
Attachment 2	**Acronyms and Abbreviations**	41
Attachment 3	**Contact and Reporting Addresses**	43
Attachment 4	**Example Certification by a Responsible Official**	44

Section 1 - Source Information

1. Addresses

Source

Phoenix Services LLC
13500 South Perry Avenue
Riverdale, Illinois 60827

Owner

Phoenix Services LLC
148 West State Street, Suite 301
Kennett Square, Pennsylvania 19348

Operator

Phoenix Services LLC
13500 South Perry Avenue
Riverdale, Illinois 60827

Permittee

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

2. Contacts

Certified Officials

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

	Name	*Title*
Responsible Official	Terry Wagaman	Executive Vice President
Delegated Authority	Clint McGinty	Director Health, Safety and Environmental

Other Contacts

	Name	*Phone No.*	*Email*
Source Contact	Clint McGinty	610-347-4363	Clint.McGinty@phxslag.com
Technical Contact	Clint McGinty	610-347-4363	Clint.McGinty@phxslag.com
Correspondence	Clint McGinty	610-347-4363	Clint.McGinty@phxslag.com
Billing	Clint McGinty	610-347-4363	Clint.McGinty@phxslag.com

3. Single Source

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

I.D. No.	*Permit No.*	*Single Source Name and Address*
031258ABR	02110058	ArcelorMittal Riverdale LLC 13500 South Perry Avenue Riverdale, IL 60827

Section 2 - General Permit Requirements

1. Prohibitions

a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]

b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]

c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]

d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

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

a. i. An emergency occurred and the source can identify the cause(s) of the emergency.

ii. The source was at the time being properly operated.

iii. The source submitted notice of the emergency to the IEPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.

c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

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

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

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

c. Duty to Maintain Equipment

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

d. Disposal Operations

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

e. Duty to Pay Fees

i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act]

ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]

iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

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

i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. Sample or monitor any substances or parameters at any location at reasonable times:

A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or

B. As otherwise authorized by the Act.

v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

g. **Effect of Permit**

i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:

A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.

B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.

C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.

D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. **Severability Clause**

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

4. Testing

a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of

any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

i. Testing by Owner or Operator: The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.

ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

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

b. Retention of Records

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

ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.

ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of

requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:

A. The identification of each term or condition of this permit that is the basis of the certification.

B. The compliance status.

C. Whether compliance was continuous or intermittent.

D. The method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.

iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

b. Certification by a Responsible Official

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

7. Permit Shield

a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after August 20, 2014(date USEPA notice started), unless this permit has been modified to reflect such new requirements.

b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

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

a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.

b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR".

   i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.

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

c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN".

   i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.

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

9. Reopening and Revising Permit

a. **Permit Actions**

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

b. **Reopening and Revision**

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

i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;

iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or

iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. **Inaccurate Application**

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

d. **Duty to Provide Information**

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

10. Emissions Trading Programs

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

11. Permit Renewal

a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(l) and (o) of the Act]

b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

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

13. Startup, Shutdown, and Malfunction

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

Section 3 - Source Requirements

1. Applicable Requirements

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

a. **Fugitive Particulate Matter**

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

ii. Compliance Method (Fugitive Particulate Matter)

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

b. **Ozone Depleting Substances**

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

i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.

ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.

iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.

iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.

v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

c. **Asbestos Demolition and Renovation**

i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or

demolish pursuant to Condition 3.1(c)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of $150.

ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).

iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

d. **Future Emission Standards**

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

2. Applicable Plans and Programs

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

a. **Fugitive PM Operating Program**

i. Pursuant to 35 IAC 212.309, this source shall be operated under the provisions of Fugitive PM Operating Program prepared by the Permittee and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). The Permittee shall comply with the Fugitive PM Operating Program and any amendments to the Fugitive PM Operating Program submitted pursuant to Condition 3.2(a)(ii). As a minimum, the Fugitive PM Operating Program shall include provisions identified in 35 IAC 212.310(a) through (g) and the following:

A. A detailed description of the best management practices utilized to achieve compliance with 35 IAC 212.304 through 212.308.

B. Estimated frequency of application of dust suppressants by location.

C. Such other information as may be necessary to facilitate the IEPA's review of the Fugitive PM Operating Program.

ii. Pursuant to 35 IAC 212.312, the Fugitive PM Operating Program shall be amended from time to time by the Permittee so that the Fugitive PM Operating Program is current. Such amendments shall be consistent with the requirements set forth by this Condition 3.2(a) and shall be submitted to the IEPA within 30 days of such amendment. Any future revision to the Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

iii. The Fugitive PM Operating Program, as submitted by the Permittee on August 21, 2007, is incorporated herein by reference. The document constitutes the formal Fugitive PM Operating Program required under 35 IAC 212.310, addressing the control of fugitive particulate matter emissions from all plant roadways, including the iron-making and steel-making roads, storage piles, access areas near storage piles, and other subject operations located at the facility that are subject to 35 IAC 212.309.

iv. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Fugitive PM Operating Program, any amendments or revisions to the Fugitive PM Operating Program (as required by Condition 3.2(a)), and the Permittee shall also keep a record of activities completed according to the Fugitive PM Operating Program.

b. **PM_{10} Contingency Measure Plan**

i. Pursuant to 35 IAC 212.700, the Permittee shall have on file with the IEPA a PM_{10} Contingency Measure Plan reflecting the PM_{10} emission reduction set forth in 35 IAC 212.701 and 212.703.

ii. The PM_{10} Contingency Measure Plan shall be implemented by the Permittee in accordance with 35 IAC 212.704 upon notification from the IEPA.

iii. Pursuant to 35 IAC 212.701(c), for operational changes subject to 35 IAC 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 which require either a new permit or a revision to an existing permit, the Permittee shall, within 30 days after such changes, submit a request to modify this CAAPP permit in order to include a new, appropriate PM_{10} Contingency Measure Plan.

iv. The PM_{10} Contingency Measure Plan, as submitted by the Permittee on August 11, 2014, is incorporated herein by reference. The document constitutes the formal PM_{10} Contingency Measure Plan required by 35 IAC 212.701, addressing the Levels 1 and 2 control measures for reducing annual source-wide fugitive emissions of PM_{10} from plant roads (paved and unpaved) and materials handling operations in the event of an exceedance of the 24-hour ambient air quality standard for PM_{10} under 35 IAC 212.704 or 212.705.

v. The Permittee shall keep a copy of the PM_{10} Contingency Measure Plan. The Permittee shall also keep a record of activities completed according to the PM_{10} Contingency Measure Plan.

vi. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the PM_{10} Contingency Measure Plan, any amendments or revisions to the PM_{10} Contingency Measure Plan (as required by Condition 3.2(b)), and the Permittee shall also keep a record of activities completed according to the PM_{10} Contingency Measure Plan.

c. **Episode Action Plan**

i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.

ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.

iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically

incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

iv. The Episode Action Plan, as submitted by the Permittee on July 7, 2014, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO2, PM10, NO2, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.

v. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

d. **Risk Management Plan (RMP)**

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

3. Title I Requirements

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

4. Synthetic Minor Limits

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

5. Reporting Requirements

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

a. **Prompt Reporting**

i. A. Pursuant to Section 319.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:

I. Requirements in Condition 3.1(a)(i), 3.1(b), and 3.1(c).

II. Requirements in Conditions 3.2(a), 3.2(b), and 3.2(c).

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

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

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

A. Date and time of the deviation.

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

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

b. **Semiannual Reporting**

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

Monitoring Period	Report Due Date
January through June	July 31
July through December	January 31

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

c. **Annual Emissions Reporting**

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

Section 4 - Emission Unit Requirements

4.1 Material Handling and Processing Operations

1. Emission Units and Operations

Operation	*Emission Units*	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Slag Processing (Main Plant)	Slag Screening	PM	1981	N/A	Water application prior to slag processing	None
	Slag Crushing	PM	1981	N/A		None
	Slag Stacking	PM	1981	N/A		None
	Slag Conveying	PM	1981	N/A		None
	Magnet Drum Separating	PM	1981	N/A		None
Fines Processing (Screening Plant)	Slag Screening	PM	1998	N/A	Water application prior to slag processing	None
	Slag Conveying	PM	1998	N/A		None
Portable Crushing and Screening Plant	Slag Screening	PM	2008	N/A	Water application prior to slag processing	None
	Slag Crushing	PM	2008	N/A		None
	Slag Conveying	PM	2008	N/A		None
	Feed Hopper	PM	2008	N/A		None
	Storage Piles	PM	2008	N/A		None

2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. <u>Opacity Requirements</u>

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

B. Pursuant to 35 IAC 212.316(b), no person shall cause or allow fugitive particulate matter emissions generated by the crushing or screening of slag, stone, coke or coal to exceed an opacity of 10 percent.

ii. <u>Compliance Method (Opacity Requirements)</u>

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit listed in Condition 4.1.1 in accordance with Method 22 for visible emissions at least semi-annually during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week.

1) Pursuant to 35 IAC 212.107(Measurement Method for Visible Emissions), for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR Part 60, Appendix A, incorporated by reference in 35 IAC 212.113, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute.

2) Pursuant to 35 IAC 212.109 (Measurement Methods for Opacity), except as otherwise provided, and except for the methods of data reduction when applied to 35 IAC 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, incorporated by reference in 35 IAC 212.113.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. I. Pursuant to Section 39.5(7)(b) and (e) of the Act, in the event that a Method 9 is performed as required by Condition 4.1.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9, which at a minimum shall include the following:

1. Identification of the operation for which observations were conducted.

2. Date and time of the observations.

3. Name of observer(s).

4. Description of observation condition, including recent weather.

5. Description of the operating conditions of the affected operation.

6. Raw data.

7. Opacity determination.

8. Conclusion.

II. The duration of opacity observations made in accordance with Method 9 shall be at least 30 minutes (five 6 minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 5.0 percent, in which case the observations may cease.

D. Pursuant to 35 IAC 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 IAC 212.316 shall keep written records of the actual application of control measures as may be needed for compliance with the opacity limitations of 35 IAC 212.316 (i.e.,

Condition 4.1.2(a)(i)(B)) and shall submit to the Agency an annual report containing a summary of such information.

I. Pursuant to 35 IAC 212.316(g)(2), the records required 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; and

4. A log recording incidents when control measures were not used and a statement of explanation.

II. Pursuant to 35 IAC 212.316(g)(3), copies of all records required by 35 IAC 212.316 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.

III. Pursuant to 35 IAC 212.316(g)(4), the records required by 35 IAC 212.316 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.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See Section 7.2 of this permit)

B. Pursuant to Construction Permit #08050023, emissions from the Portable Crushing and Screening Plant shall not exceed the following limits: [T1]

Emission Unit		(Lb/hr)	(Tons/Month)	(Tons/Year)
Portable Crushing and Screening Plant	PM	2.76	0.03	0.28
	PM_{10}	1.28	0.01	0.099

C. Pursuant to Construction Permit #94020007 and Permit #84030043, emissions from the Slag Processing (Main Plant) shall not exceed the following limits: [T1]

Emission Unit		(Lb/hr)	(Tons/Year)
Slag Processing (Main Plant)	PM	6.69	9.74

ii. Compliance Method (PM Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(b) & (d) of the Act, the Permittee shall conduct inspections of the control measures (i.e., water sprays) at least once per year for the purpose of verifying that these control measures control emissions from the associated equipment are in place and can be properly implemented as needed to control PM emissions.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep the following records related to PM emissions from each emission unit:

I. A file containing the method used by the Permittee to determine emissions of PM, with supporting documentation.

II. The hours of operation for each emission unit, hr/mo and hr/yr.

III. The slag throughput for the Portable Crushing and Screening Plant and Slag Processing (Main Plant), ton/mo and ton/yr.

IV. The emissions of PM and PM_{10} from each emission unit, lb/hr (monthly average), ton/mo and ton/yr with supporting calculations. 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 average).

C. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep the following records, which shall demonstrate compliance with Conditions 4.1.2(b)(ii)(A & B), for the inspections related to the water sprays associated with the Slag Processing (Main Plant), Fines Processing (Screening Plant), and Portable Crushing and Screening Plant:

I. Condition of each water spray.

II. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, and identification of equipment being inspected.

D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain a record of the amount of water used for the Slag Processing (Main Plant), Fines Processing (Screening Plant), Portable Crushing and Screening Plant, gal/mo and gal/yr.

c. i. <u>Hazardous Air Pollutant Requirements (HAP)</u>

A. Pursuant to Construction Permit #08050023, HAP-PM emissions from the Portable Crushing and Screening Plant shall not exceed 0.11 lb/hr and 0.44 tons/year. [T1]

ii. <u>Compliance Method (HAP Requirements)</u>

Recordkeeping

A. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep the following records related to HAP-PM emissions from each emission unit:

I. A file containing the method used by the Permittee to determine emissions of HAP-PM, with supporting documentation.

II. The hours of operation for each emission unit, hr/mo and hr/yr.

III. The emissions of HAP-PM from each emission unit, lb/hr (monthly average), ton/mo and ton/yr with supporting calculations. 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 average).

d. i. **Operational and Production Requirements**

A. Pursuant to Construction Permit #94070007 and Permit #84030043, the Slag Processing (Main Plant) shall not exceed the following limits: [T1]

	Hours of Operation	Process Rate
Emission Unit	(Hours/Year)	(Lb/Hour)
Slag Processing (Main Plant)	2,912	350,000

B. Pursuant to Construction Permit #08050023, the amount of slag processed by the Portable Crushing and Screening Plant shall not exceed 6,480 tons/month and 64,800 tons/year. [T1]

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

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

I. For the slag Processing (Main Plant):

1. The hours of operation, hr/mo and hr/yr, and

2. The process rate, lb/hr (monthly average) and ton/yr.

II. For the Portable Crushing and Screening Plant, the Permittee shall keep the following records:

1. The amount of slag processed, ton/mo and ton/yr.

e. i. **Work Practice Requirements**

A. Pursuant to 35 IAC 212.308, crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations shall be sprayed with water or a surfactant solution, utilize choke-feeding or be treated by an equivalent method in accordance with an operating program.

B. Pursuant to Section 39.5(7)(a) of the Act, at all times, the Permittee shall, to the extent practicable, maintain and operate the emission units, including associated control measures, in a manner consistent with good air pollution control practice for minimizing emissions.

ii. Compliance Method (PM Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(a) and (d) of the Act, the Permittee shall conduct inspections of the control measures (i.e., water sprays) at least once per year for the purpose of verifying that these control measures control emissions from the associated equipment are in place and being properly implemented.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep the following records, which shall demonstrate compliance with Conditions 4.1.2(e)(i)(A) and (B), for the inspections related to the water sprays associated with the Slag Processing (Main Plant), Fines Processing (Screening Plant), Portable Crushing and Screening Plant:

I. Condition of each water spray.

II. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, and identification of equipment being inspected.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain a record of the amount of water used for the Slag Processing (Main Plant), Fines Processing (Screening Plant), Portable Crushing and Screening Plant, gal/mo and gal/yr.

D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum the following:

I. Date and time inspections were performed;

II. Name(s) of inspection personnel;

III. Identification of equipment being inspected;

IV. Findings of the inspections, noting the presence of any atypical material accumulations in the vicinity of the process and the cause of such accumulations;

V. Operation and maintenance procedures; and

VI. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

f. i. <u>Work Practice Requirements From Illinois Pollution Control Board Order #PCB85-38</u>

A. Pursuant to Illinois Pollution Control Board Order #PCB85-38:

I. Pursuant to PCB85-38-(VI)C, the Permittee shall consistently use 1 x 4 inch screened, processed slag as a pot lining for the slag pots used to transport slag from Acme's BOF shop. The pot lining material may consist of hot, unsized slag in a quantity that will not cause or contribute to violations of the Act or Board Rules.

II. Pursuant to PCB85-38-(VI)D, the Permittee shall consistently use 1 x 4 inch screened, processed slag as a lining for the slag pots used to transport slag from Acme's BOF shop.

III. Pursuant to PCB85-38-(VI)E, notwithstanding the terms of PCB85-38-(VI)C, if any event including, but not limited to, weather conditions and/or other conditions necessitating the discontinuance of the use of 1 x 4 inch screened, processed slag to prevent injury to persons or severe, damage to equipment, precludes Permitee's use of 1 x 4 inch screened, processed slag as a lining material for the slag pots, Permittee shall immediately notify the Agency by telephone and no later than two (2) business days thereafter in writing of the event at the addresses provided below. This notice shall describe the expected length of time said lining material cannot be used, the specific reasons precluding the use of said lining material, and the expected time period at which use of a 1 x 4 inch screened, processed slag will be resumed.

Notice shall be sent to:

Manager, Field Operations Section
Illinois EPA, Bureau of Air
Regional Office #1
9511 Harrison Street
Des Plaines, IL 60016
Phone No.: 847/294-4000

Manager, Permits Sections
Illinois EPA, Bureau of Air
Permit Section (MC 11)
1021 North Grand Avenue East
P.O. Box 19506
Springfield, IL 62794-9506
Phone No.: 217/785-1705

Note: The Agency contact information has been updated from the original address language in the order to the current address.

The Permitee's use of pot lining material under such circumstances shall not constitute a violation of the terms of the permit referred to in PCB85-38-(VI)F.

B. Pursuant to Permit #84030043, the Permittee is authorized to use up to 3 parts of hot unsized slag for every 15 parts of sized 1 x 4 slag as pot liner when the hot unsized slag is necessary to dry the sized 1 x 4 slag for safety reasons. At all other times Permittee shall use 1 x 4 sized slag as a pot liner. [T1]

ii. Compliance Method (Work Practice Requirements)

Recordkeeping

A. Pursuant to 39.5(7)(b) of the Act, the Permittee shall keep the following records which shall demonstrate compliance with Conditions 4.1.2(f)(i)(A) and (B):

I. Documents demonstrating that slag used for pot lining for slag pots has been consistently screened with 1 X 4 inch screens at all time except as provided in Conditions 4.1.2(f)(i)(A)(III) and (B).

II. Documents demonstrating the no more that 3 parts of hot unsized slag for every 15 parts of 1 X 4 inch sized slag is used when unsized slag is necessary to dry the 1 X 4 inch sized slag for safety reasons.

III. Documents demonstrating notifications to IEPA have been immediately notified by telephone if events including, but not limited to, weather conditions and/or other conditions necessitating the discontinuance of the use of 1 x 4 inch screened, processed slag to prevent injury to persons or severe, damage to equipment, precludes use of 1 x 4 inch screened, processed slag as a lining material for the slag pots.

IV. Copies of written reports for events which resulted in immediate notification that were submitted to the IEPA with 2 business days of such an event.

3. Non-Applicability Determinations

a. The emission units of the Slag Processing (Main Plant), Fines Processing (Screening Plant), and Portable Crushing and Screening Plant are not subject to the New Source Performance Standards (NSPS) for Metallic Mineral Processing Plants, 40 CFR Part 60 Subpart LL, because the emission units do not consist of a metallic mineral processing plant as defined at 40 CFR 60.381. Specifically, the emission units do not produce metallic mineral concentrates from ore.

b. The emission units of the Slag Processing (Main Plant), Fines Processing (Screening Plant), and Portable Crushing and Screening Plant are not subject to the New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing Plants, 40 CFR Part 60 Subpart OOO, because the emission units do not consist of a nonmetallic mineral processing plant as defined at 40 CFR 60.671. Specifically, the emission units do not to crush or grind nonmetallic minerals.

c. The emission units of the Slag Processing (Main Plant), Fines Processing (Screening Plant), and Portable Crushing and Screening Plant are not subject to 35 IAC 212.324(b), because the mass emission limits contained in 35 IAC 212.324(b) shall not apply to those emission units with no visible emissions other than fugitive particulate matter, pursuant to 35 IAC 212.324(d).

d. The emission units of the Slag Processing (Main Plant) and Fines Processing (Screening Plant) are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

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

a. **Prompt Reporting**

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

I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), 4.1.2(c)(i), 4.1.2(d)(i), and 4.1.2(e)(i).

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

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

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

A. Date and time of the deviation.

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

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

b. **State Reporting**

i. Pursuant to 35 IAC 212.316(g)(5), a quarterly report shall be submitted to the Illinois EPA 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 35 IAC 212.316. 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.

4.2 Fugitive PM Emissions

1. Emission Units and Operations

Operation	*Emission Units*	*Pollutants Being Regulated*	*Original Constructio n Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Fugitive PM Emissions	Vehicular Traffic on Roadways, Parking Lots	PM	1995	N/A	Water or chemical dust suppressant as needed	None
	Loading/Unloading Operations	PM	1995	N/A	Water application prior to slag processing	None
	Storage Piles and Associated Activities	PM	1995	N/A	Water application prior to slag processing	None

2. Applicable Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. **Opacity Requirements**

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

B. Pursuant to 35 IAC 212.316(c), no person shall cause or allow fugitive particulate matter emissions from any roadway or parking area to exceed an opacity of 10 percent.

C. Pursuant to 35 IAC 212.316(d), 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.

D. Pursuant to 35 IAC 212.316(f), unless an emission unit has been assigned a particulate matter, PM-10, or fugitive particulate matter emissions limitation elsewhere in 35 IAC 212.316, no person shall cause or allow fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit listed in Condition 4.2.1 in accordance with Method 22 for visible emissions at least semi-annually during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 12 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, application of wet suppression, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

I. Pursuant to 35 IAC 212.107(Measurement Method for Visible Emissions), for both fugitive and nonfugitive particulate matter emissions, a

determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR Part 60, Appendix A, incorporated by reference in 35 IAC 212.113, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. Subpart A of Part 212 shall not apply to 35 IAC 212.301.

II. Pursuant to 35 IAC 212.109 (Measurement Methods for Opacity), except as otherwise provided, and except for the methods of data reduction when applied to 35 IAC 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, incorporated by reference in 35 IAC 212.113, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5 second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. I. Pursuant to Section 39.5(7)(b) of the Act, in the event that a Method 9 is performed as required by Condition 4.2.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9, which at a minimum shall include the following:

1. Identification of the operation for which observations were conducted.

2. Date and time of the observations.

3. Name of observer(s).

4. Description of observation condition, including recent weather.

5. Description of the operating conditions of the affected operation.

6. Raw data.

7. Opacity determination.

8. Conclusion.

II. The duration of opacity observations made in accordance with Method 9 shall be at least 30 minutes (five 6 minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent, in which case the observations may cease.

D. Pursuant to 35 IAC 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 IAC 212.316 shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of 35 IAC 212.316 and shall submit to the Agency an annual report containing a summary of such information.

I. Pursuant to 35 IAC 212.316(g)(2), the records required 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

6. A log recording incidents when control measures were not used and a statement of explanation.

II. Pursuant to 35 IAC 212.316(g)(3), copies of all records required by 35 IAC 212.316 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.

III. Pursuant to 35 IAC 212.316(g)(4), the records required by 35 IAC 212.316 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.

b. i. <u>Particulate Matter Requirements (PM)</u>

A. The affected Fugitive PM Emissions units shall comply with the standard in Condition 3.1(a)(i), which addresses visible emissions of fugitive particulate matter, as defined by 35 IAC 211.2490. Specifically, 35 IAC 212.301.

ii. <u>Compliance Method (PM Requirements)</u>

The source shall comply with the monitoring and recordkeeping in Condition 3.1(a)(ii).

c. i. **Operational and Production Requirements**

A. Pursuant to 35 IAC 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 IAC 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 IAC 212.309, 212.310 and 212.312 (Condition 3.2(a)).

ii. Compliance Method (Operational and Production Requirements)

The source shall comply with the monitoring and recordkeeping in Condition 3.2(a).

d. i. **Work Practice Requirements**

A. Pursuant to Section 39.5(7)(a) of the Act, at all times, the Permittee shall, to the extent practicable, maintain and operate the Fugitive PM Emissions units, including associated control measures, in a manner consistent with good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(a) & (b) of the Act, the Permittee shall conduct inspections of the control measures at least annually for the purpose of verifying that these control measures control emissions from the associated equipment are in place and being properly implemented.

Recordkeeping

B. Pursuant to 35 IAC 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 IAC 212.316 shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of 35 IAC 212.316 and shall submit to the Agency an annual report containing a summary of such information.

I. Pursuant to 35 IAC 212.316(g)(2), the records required 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

6. A log recording incidents when control measures were not used and a statement of explanation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum the following:

I. Date and time inspections were performed;

II. Name(s) of inspection personnel;

III. Identification of equipment being inspected;

IV. Findings of the inspections, noting the presence of any atypical material accumulations in the vicinity of the process and the cause of such accumulations;

V. Operation and maintenance procedures; and

VI. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

a. The fugitive emission units are not subject to 35 IAC 321 or 212.322 due to the disperse nature of such emission units, such rules cannot reasonably be applied, pursuant to 35 IAC 212.323.

b. The fugitive emission units are not subject to 35 IAC 304 as the storage piles do not have uncontrolled emissions of fugitive particulate matter in excess of 50 T/yr which are located within a source whose potential particulate emissions from all emission units exceed 100 T/yr, pursuant to 35 IAC 212.304.

c. The fugitive emission units are not subject to 35 IAC 305 as there are no conveyor loading operations to storage piles applicable to 35 IAC 212.304, pursuant to 35 IAC 212.305.

d. The fugitive emission units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the emission units do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

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

a. <u>Prompt Reporting</u>

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

I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), and 4.2.2(d)(i).

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

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

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

A. Date and time of the deviation.

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

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

b. <u>State Reporting</u>

i. Pursuant to 35 IAC 212.316(g)(5), a quarterly report shall be submitted to the Illinois EPA 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 35 IAC 212.316. 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.

Section 5 - Additional Title I Requirements

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

Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

This condition is reserved for insignificant activities, as defined in 35 IAC 201.210 and 201.211, which are subject to specific standards promulgated pursuant Sections 111, 112, 165, or 173 of the Clean Air Act, see Sections 9.1(d) and 39.5(6)(a) of the Act. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

Insignificant Activity	*Number of Units*	*Insignificant Activity Category*
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).	5	35 IAC 201.210(a)(4)
Equipment used to fill drums, pails, or other containers (excluding aerosol cans) as further detailed in 35 IAC 2101.210(a)(8).	2	35 IAC 201.210(a)(8)
Storage tanks < 10,000 gallon with annual throughput < 100,000 gallon (not storing gasoline or any material listed as a HAP).	6	35 IAC 201.210(a)(10)
Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oil.	20	35 IAC 201.210(a)(11)

3. Insignificant Activities in 35 IAC 201.210(b)

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

4. Applicable Requirements

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

a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).

b. Pursuant to 35 IAC 212.321 or 212.322 (see Conditions 7.2(a) and (b)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.

c. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.

d. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 218.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

e. Pursuant to 35 IAC 218.182, for each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 218.182, except as provided in 35 IAC 218.181.

5. Compliance Method

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

a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

b. Potential to emit emission calculations before any air pollution control device for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

6. Notification Requirements for Insignificant Activities

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

a. <u>Notification 7 Days in Advance</u>

i. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):

A. A description of the emission unit including the function and expected operating schedule of the unit.

B. A description of any air pollution control equipment or control measures associated with the emission unit.

C. The emissions of regulated air pollutants in lb/hr and ton/yr.

D. The means by which emissions were determined or estimated.

E. The estimated number of such emission units at the source.

F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.

ii. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.

iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any addition of an insignificant activity noted above.

b. **Notification Required at Renewal**

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

c. **Notification Not Required**

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

Section 7 - Other Requirements

1. Testing

a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:

i. The name and identification of the emission unit(s) being tested.

ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.

iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.

iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.

v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.

vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.

vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.

viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.

ix. Sampling of materials, QA/QC procedures, inspections, etc.

b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:

i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.

ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.

c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:

i. General information including emission unit(s) tested.

ii. A summary of results.

iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).

iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.

v. Detailed description of test conditions, including:

A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.

B. Control equipment information, i.e., equipment condition and operating parameters during testing.

C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.

vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.

vii. An explanation of any discrepancies among individual tests or anomalous data.

viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.

ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.

x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.

d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. PM Process Weight Rate Requirements

a. New Process Emission Units - 35 IAC 212.321

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

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

ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation: [35 IAC 212.321(b)]

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

Where:

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

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

A = 2.54
B = 0.53

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

A = 24.8
B = 0.16

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

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

Section 8 - State Only Requirements

1. Permitted Emissions for Fees

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

Pollutant		*Tons/Year*
Volatile Organic Material	(VOM)	---
Sulfur Dioxide	(SO_2)	---
Particulate Matter	(PM)	10.5
Nitrogen Oxides	(NO_x)	---
HAP, not included in VOM or PM	(HAP)	---
	Total	10.5

Attachment 1 - List of Emission Units at This Source

Section	*Emission Units*	*Description*
4.1	Material Handling and Processing Operations	The source operates material handling and processing equipment to properly size and prepare the material. Material is received from the ArcelorMittal Riverdale LLC co-located on the same property.
4.2	Fugitive PM Emissions	Emissions caused by moving vehicles that creates particulate matter emissions on paved and/or unpaved roadways (i.e., road dust). Particulate matter is also emitted from loading/unloading operations and storage piles at the source.

Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
Btu	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO_2	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
GACT	Generally Acceptable Control Technology
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
hp	Horsepower
hr	Hour
H_2S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
kw	Kilowatts
LAER	Lowest Achievable Emission Rate
lbs	Pound

m	Meter
MACT	Maximum Achievable Control Technology
M	Thousand
MM	Million
mos	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PB	Lead
PEMS	Predictive Emissions Monitoring System
PM	Particulate matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
$PM_{2.5}$	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO_2	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

Attachment 3 - Contact and Reporting Addresses

IEPA Compliance Section	Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276 Phone No.: 217/782-2113
IEPA Stack Test Specialist	Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, Illinois 60016 Phone No.: 847/294-4000
IEPA Air Quality Planning Section	Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276 Phone No.: 217/782-2113
IEPA Air Regional Field Operations Regional Office #1	Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, Illinois 60016 Phone No.: 847/294-4000
IEPA Permit Section	Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506 Phone No.: 217/785-1705
USEPA Region 5 - Air Branch	USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604 Phone No.: 312/353-2000

Attachment 4 - Example Certification by a Responsible Official

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