

217/782-2113

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

PERMITTEE

A. Finkl & Sons
Attn: Carl Manthe
2011 North Southport Avenue
Chicago, Illinois 60614

<u>Application No.:</u> 95120184	<u>I.D. No.:</u> 031600ATP
<u>Applicant's Designation:</u>	<u>Date Received:</u> December 8, 1995
<u>Operation of:</u> Iron and Steel Forging	
<u>Date Issued:</u> October 24, 2000	<u>Expiration Date</u> ² : October 24, 2005
<u>Source Location:</u> 2011 North Southport Avenue, Chicago, Cook, IL 60614	
<u>Responsible Official:</u> Bruce Liimatainen/President	

This permit is hereby granted to the above-designated Permittee to operate an Integrated Steel Forging Source, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Nathan A. Frank at 217/782-2113.

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

DES:NAF:psj

cc: Illinois EPA, FOS, Region 1
USEPA

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

² Except as provided in Condition 8.7 of this permit.

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Control: Baghouses
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1.0 SOURCE IDENTIFICATION

1.1 Source

A. Finkl & Sons
2011 North Southport Avenue
Chicago, Illinois 60614
(773) 975-2649

I.D. No.: 031600ATP
Standard Industrial Classification: 3462

1.2 Owner/Parent Company

A. Finkl & Sons
2011 North Southport Avenue
Chicago, Illinois 60614

1.3 Operator

A. Finkl & Sons
2011 North Southport Avenue
Chicago, Illinois 60614

Carl Manthe
(773) 975-2649

1.4 General Source Description

The A. Finkl & Sons plant is located at 2011 North Southport Avenue, Chicago, Illinois 60614. The source is an integrated producer of large steel forgings.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
lb	pound
ILCS	Illinois Compiled Statutes
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Natural gas fired furnaces and boilers rated below 10 MBtu/hr.

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

None

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

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

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

3.2 Compliance with Applicable Requirements

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

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

3.3 Addition of Insignificant Activities

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Furnace 4646060	40 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 4646070	40 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 4646080	40 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 6346070	23.76 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 6346080	23.76 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 6262230	23.08 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 4862050	16 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 6363010	16 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 6262210	15.385 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 6262220	15.385 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 6262240	15.385 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 6262250	15.385 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Boiler 3737010	14.5 MBtu/hr Rated Natural Gas Fired Steam Generation Boiler	Pre-1972	None
Furnace 6363040	14 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 4646030	10 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Furnace 4646090	10 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	Pre-1972	None
Arc Furnace 4848010	Electric Arc Furnace Used to Melt Steel Scrap	Pre-1972	Baghouse 484801A
Arc Furnace 4848020	Electric Arc Furnace Used to Melt Steel Scrap	Pre-1972	Baghouse 484802A
Scarfig Station 6464010	Ingot Surface Preparation Processes	Pre-1972	Baghouse 646401A
Shot Blast 6262500	Cleaning of Steel Forgings	Pre-1972	Baghouse 626250A
Quench Oil Tank 6262400	Cooling of hot forgings in oil quenchant	Pre-1972	None
Teeming 4848400	Pouring liquid steel into a mold to solidify	Pre-1972	None

Fugitive Particulate Matter Emissions	Particulate Matter Emissions from storage piles, equipment handling, and loading and unloading	-	None
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5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of nitrogen oxide and carbon monoxide emissions.

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

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

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

- b.
 - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
 - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
 - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical

dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

- c. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

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

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

5.2.4 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable

requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.5 Episode Action Plan

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

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	10.68
Sulfur Dioxide (SO ₂)	1.01
Particulate Matter (PM)	38.51
Nitrogen Oxides (NO _x)	187.71
HAP, not included in VOM or PM	--
TOTAL	237.91

5.5.2 Emissions of Hazardous Air Pollutants

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

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

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

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

6.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is

based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.3 Recordkeeping and Reporting

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

6.4 Federal Enforceability

Section 6.0 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Natural Gas Fired Furnaces

7.1.1 Description

The source operates direct fired, natural gas, metal heating furnaces. Metal ingots are heated in the furnaces before they are shaped into forgings. Then, the shaped forgings are put back into the furnaces for heat treating.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Furnace 4646060	40 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 4646070	40 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 4646080	40 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 6346070	23.76 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 6346080	23.76 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 6262230	23.08 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 4862050	16 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 6363010	16 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 6262210	15.385 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 6262220	15.385 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 6262240	15.385 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 6262250	15.385 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 6363040	14 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 4646030	10 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None
Furnace 4646090	10 MBtu/hr Rated Natural Gas Fired Metal Heating Furnace	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected furnace" for the purpose of these unit-specific conditions, is a furnace described in Conditions 7.1.1 and 7.1.2.
- b. The affected furnaces are subject to the emission limits identified in Condition 5.2.2.
- c. No person shall cause or allow the emissions of CO from an affected furnace to exceed 200 ppm, corrected to 50% excess air [35 IAC 216.121].
- d. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 1) [35 IAC 212.322(a)].

7.1.4 Non-Applicability of Regulations of Concern

- a. The provisions of 35 IAC 218.301 and 302, Use of Organic Material, shall not apply to fuel combustion emission sources [35 IAC 218.303].
- b. This permit is issued based on the affected furnaces not being subject to 35 IAC 217.141 because each actual heat input is less than 250 mmBtu/hr.

7.1.5 Operational and Production Limits and Work Practices

- a. Natural gas shall be the only fuel used in the affected furnaces.

7.1.6 Emission Limitations

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

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected furnaces to demonstrate compliance with Conditions 5.5.1, 7.1.3, 7.1.5, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the following items:
 - i. Total natural gas usage for the affected furnaces (mmscf/year);
 - ii. Annual aggregate NO_x, PM, SO₂, and VOM emissions from the affected furnaces, based on fuel consumption and the applicable emission factors, with supporting calculations (tons/year).
- b. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.1.3, 7.1.5, or 7.1.6, which shall include:
 - i. Identification of the limit that may have been exceeded.
 - ii. Duration of the possible exceedance.
 - iii. An estimate of the amount of emissions in excess of the applicable standard.
 - iv. A description of the cause of the possible exceedance.
 - v. When compliance was reestablished.

7.1.10 Reporting Requirements

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

- a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.1.3, 7.1.5, or 7.1.6. The notification shall include:

- i. Identification of the limit that may have been exceeded.
 - ii. Duration of the possible exceedance.
 - iii. An estimate of the amount of emissions in excess of the applicable standard.
 - iv. A description of the cause of the possible exceedance.
 - v. When compliance was reestablished.
- b. The Permittee shall submit the following information along with its annual emission report:
- i. A summary of exceedances of the limits in Conditions 7.1.3, 7.1.5, or 7.1.6, if any, which required notification to the Compliance Section in accordance with Condition 7.1.10(a).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected furnace without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(c) and (d) is considered to be assured by the inherent nature of the operations at this source, as demonstrated by historical operation.
- b. Emissions shall be determined based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below. Note: Any emission test data from a representative emission source or more recent emission factor may be used:

Emission factors for the affected furnaces burning natural gas:

<u>Pollutant</u>	<u>Emission Factors</u> <u>(lb/mmscf)</u>
NO _x	100.0
PM	7.6
SO ₂	0.6
VOM	5.5
CO	84.0

These are emission factors determined for the affected furnaces using AP-42 emission factors for natural gas combustion.

Emissions formula for the affected furnaces burning natural gas:

Appropriate Emissions (ton) = Natural Gas Consumed (scf) x The Appropriate Emission Factor (lb/mmscf) ÷ 1,000,000 (scf/mmscf) ÷ 2,000 (lb/ton)

7.2 Natural Gas Fired Boilers

7.2.1 Description

The Permittee operates a natural gas fired boiler at the source to produce process steam.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Boiler 3737010	14.5 MBtu/hr Rated Natural Gas Fired Steam Generation Boiler	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit-specific conditions, is a boiler described in Conditions 7.2.1 and 7.2.2.
- b. The affected boiler is subject to the emission limits identified in Condition 5.2.2.
- c. No person shall cause or allow the emissions of CO from an affected boiler to exceed 200 ppm, corrected to 50% excess air [35 IAC 216.121].

7.2.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected boilers not being subject to the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subparts A and Db, because the affected boilers were constructed, modified, or reconstructed on or before June 19, 1984, pursuant to 40 CFR 60.40b(a).
- b. This permit is issued based on the affected boilers not being subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subparts A and Dc, because the affected boilers were constructed, modified, or reconstructed on or before June 9, 1989, pursuant to 40 CFR 60.40c(a).
- c. This permit is issued based on the affected fuel combustion units not being subject to 35 IAC 217.241 because each actual heat input is less than 250 MBtu/hr.

7.2.5 Operational and Production Limits and Work Practices

- a. Natural gas shall be the only fuel used in the affected boilers.

7.2.6 Emission Limitations

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

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Conditions 5.5.1, 7.2.3, 7.2.5, and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the following items:
 - i. Total natural gas usage for the affected fuel combustion units (mmscf/year);
 - ii. Annual aggregate NO_x, PM, SO₂, and VOM emissions from the affected fuel combustion units, based on fuel consumption and the applicable emission factors, with supporting calculations (tons/year).
- b. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.2.3, 7.2.5, or 7.2.6, which shall include:
 - i. Identification of the limit that may have been exceeded.
 - ii. Duration of the possible exceedance.
 - iii. An estimate of the amount of emissions in excess of the applicable standard.

- iv. A description of the cause of the possible exceedance.
- v. When compliance was reestablished.

7.2.10 Reporting Requirements

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

- a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.2.3, 7.2.5, or 7.2.6. The notification shall include:
 - i. Identification of the limit that may have been exceeded.
 - ii. Duration of the possible exceedance.
 - iii. An estimate of the amount of emissions in excess of the applicable standard.
 - iv. A description of the cause of the possible exceedance.
 - v. When compliance was reestablished.
- b. The Permittee shall submit the following information along with its annual emission report:
 - i. A summary of exceedances of the limits in Conditions 7.2.3, 7.2.5, or 7.2.6, if any, which required notification to the Compliance Section in accordance with Condition 7.2.10(a).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected boiler without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(c) is considered to be assured by the inherent nature of the operations at this source, as demonstrated by historical operation.
- b. Emissions shall be determined based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below. Note: Any emission test data from a representative emission source or more recent emission factor may be used:

Emission factors for the affected fuel combustion units burning natural gas:

<u>Pollutant</u>	<u>Emission Factors</u> <u>(lb/mmscf)</u>
NO _x	100.0
PM	7.6
SO ₂	0.6
VOM	5.5
CO	84.0

These are emission factors determined for the affected fuel combustion units using AP-42 emission factors for natural gas combustion.

Emissions formula for the affected fuel combustion units burning natural gas:

$$\text{Appropriate Emissions (ton)} = \frac{\text{Natural Gas Consumed (scf)} \times \text{The Appropriate Emission Factor (lb/mmscf)}}{1,000,000 \text{ (scf/mmscf)} \div 2,000 \text{ (lb/ton)}}$$

7.3 Electric Arc Furnaces

7.3.1 Description

The electric arc furnaces are used to melt metal scrap. The furnaces are heated by electricity and they have the capability to burn natural gas. Emissions of particulate matter result from metal meltdown and refining, charging, tapping, slagging, electrode port leakage, and ladle lancing. These emissions are controlled by baghouses.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Arc Furnace 4848010	Electric arc furnace used to melt steel scrap. The furnace has natural gas burners rated at 30 MBtu/hr	Baghouse 484801A
Arc Furnace 4848020	Electric arc furnace used to melt steel scrap. The furnace has natural gas burners rated at 30 MBtu/hr	Baghouse 484802A

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected electric arc furnace" for the purpose of these unit-specific conditions, is an electric arc furnace described in Conditions 7.3.1 and 7.3.2.
- b. The affected arc furnaces are subject to the emission limits identified in Condition 5.2.2.
- c. No person shall cause or allow the emissions of CO from an affected electric arc furnace to exceed 200 ppm, corrected to 50% excess air [35 IAC 216.121].
- d. The total particulate emissions from meltdown and refining, charging, tapping, slagging, electrode port leakage, and ladle lancing shall not exceed the allowable emission rate specified in 35 IAC 212.321 or 35 IAC 212.322 (Condition 7.3.3(e)), whichever is applicable.
- e. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises,

exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 1) [35 IAC 212.322(a)].

f. Startup Provisions

The Permittee is authorized to operate an affected electric arc furnace in excess of the applicable board emission limits during startup, pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups. This authorization is subject to the following:

- i. This authorization only extends for a period of up to 2 hours following initial start-up of the unit during each startup event. If the startup period is expected to exceed this period for a specific startup, the Illinois EPA's regional office shall be notified of the expected additional length of time required to complete the startup. The length of time may be extended if the Permittee can demonstrate that the emissions will be less during the extended period than if the unit is shutdown and restarted.
- ii. The Permittee shall take the following measures to minimize startup emissions, the duration of startups, and the frequency of startups:
 - A. Implementation of established written startup procedures, including a pre-check of the unit, so as to minimize the duration of startups and the emissions associated with startups.
 - B. Implementation of established maintenance practices so as to minimize the duration of startups and the frequency of startups. These maintenance practices shall include maintenance activities before the unit is started up, when the unit is in operation, and when the unit is shut down.
- iii. The Permittee shall fulfill the applicable recordkeeping requirements of Condition 7.3.9(d).

iv. Any startup which does not meet the requirements of this Condition 7.3.3(f) shall be assumed to be a malfunction or breakdown and therefore would be subject to the malfunction and breakdown provisions of Condition 7.3.3, if applicable, or assumed to be an exceedance and subject to the reporting requirements for exceedances in Condition 7.3.10.

g. Malfunction and Breakdown Provisions

The Permittee is authorized to operate an affected electric arc furnace in excess of the applicable board emission limits during a malfunction or breakdown, pursuant to 35 IAC 201.262, as necessary to prevent injury to persons or severe damage to equipment. This authorization is subject to the following:

i. This authorization only extends for a period of up to 4 hours following the initial malfunction or breakdown event. If the malfunction or breakdown event is expected to exceed this period for a specific malfunction or breakdown, the Illinois EPA's regional office shall be notified of the expected additional length of the malfunction or breakdown. The length of time may be extended if the Permittee can demonstrate that the emissions will be less during the extended period than if the unit is shutdown and restarted.

ii. The Permittee shall take the following measures to minimize the malfunction or breakdown emissions, the duration of malfunctions or breakdowns, and minimize the frequency of malfunctions or breakdowns:

A. Implementation of established written malfunction and breakdown procedures, so as to minimize the duration of malfunction and breakdown and the emissions associated with malfunction and breakdown.

B. Implementation of established maintenance practices so as to minimize the duration of malfunctions or breakdowns and the frequency of malfunctions or breakdowns. These maintenance practices shall include

maintenance activities before the unit is started up, when the unit is in operation, and when the unit is shut down.

- iii. The Permittee shall fulfill the applicable recordkeeping requirements of Condition 7.3.9(e).
- iv. The Permittee shall fulfill the applicable reporting requirements of Condition 7.3.10(b).
- v. Any malfunction or breakdown which does not meet the requirements of this Condition 7.3.3(g) shall be assumed to be an exceedance and subject to the reporting requirements for exceedances in Condition 7.3.10.

7.3.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected electric arc furnaces not being subject to the provisions of 40 CFR 60 Subpart AA and AAa - Standards of Performance for Steel Plants: Electric Arc Furnaces, because the affected electric arc furnaces were constructed prior to October 21, 1974.
- b. The provisions of 35 IAC 218.301 and 302, Use of Organic Material, shall not apply to fuel combustion emission sources [35 IAC 218.303].
- c. This permit is issued based on the electric arc furnaces not being subject to 35 IAC 217.341 because each actual heat input is less than 250 mmBtu/hr.

7.3.5 Operational and Production Limits and Work Practices

- a. Natural gas shall be the only fuel used in the affected electric arc furnaces.
- b. Emissions of particulate matter shall be vented to a baghouse at all times when the affected electric arc furnaces are in operation.
- c. i. The Permittee shall follow good operating practices and procedures for fabric filters in the baghouses, including periodic inspections, routine maintenance, and prompt repair of defects.

- ii. The Permittee shall maintain an adequate supply of replacement filters on the premises of the source.

7.3.6 Emission Limitations

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

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected electric arc furnaces to demonstrate compliance with Conditions 5.5.1, 7.3.3, 7.3.5, and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain the following records to demonstrate good operating practices and procedures for the baghouses:
 - i. Records for periodic inspection of the fabric filters with date, individual performing the inspection, and the nature of the inspection.
 - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired and nature of repair.
- b. The Permittee shall maintain records of the following items to demonstrate compliance with Condition 7.3.3(e) (35 IAC 212.321):
 - i. Tons of metal melted, ton/hr and ton/year.
 - ii. Emissions of PM as calculated by the emission calculation procedures described in Condition 7.3.12(c)(i), lb/hr and ton/yr.
- c. The Permittee shall maintain records of the following items:

- i. Total natural gas usage for the affected electric arc furnaces (mmscf/year);
 - ii. Annual aggregate NO_x, PM, SO₂, and VOM emissions from the affected electric arc furnaces, based on fuel consumption and the emission calculation procedures described in Condition 7.3.12(c)(ii) (tons/year).
- d. The Permittee shall maintain records of the following items for each Startup to demonstrate compliance with Condition 7.3.3(f):
- i. Date and duration of the startup, i.e., start time and time normal operation was achieved.
 - ii. Verification that the startup procedures, including a pre-check, were performed and met the requirements of Condition 7.3.3(f).
 - iii. Records of maintenance activities performed.
 - iv. If normal operation was not achieved within the authorized time of Condition 7.3.3(f), an explanation of why startup could not be achieved within the authorized time with the date and time the Illinois EPA's regional office was contacted, the person spoken to, items discussed, and follow-up instructions.
- e. The Permittee shall maintain records of the following items for Malfunction and Breakdown to demonstrate compliance with Condition 7.3.3(g):
- i. Date and duration of the malfunction or breakdown, i.e., start time and time normal operation was achieved or time operation was shutdown.
 - ii. Verification that the malfunction and breakdown procedures were performed and met the requirements of Condition 7.3.3(g).
 - iii. Records of maintenance activities performed.
 - iv. If normal operation or shutdown was not achieved within the authorized time of Condition 7.3.3(g), an explanation of why normal operation or shutdown could not be achieved within the authorized time with the

date and time the Illinois EPA's regional office was contacted, the person spoken to, items discussed, and follow-up instructions.

- f. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.3.3, 7.3.5, or 7.3.6, which shall include:
 - i. Identification of the limit that may have been exceeded.
 - ii. Duration of the possible exceedance.
 - iii. An estimate of the amount of emissions in excess of the applicable standard.
 - iv. A description of the cause of the possible exceedance.
 - v. When compliance was reestablished.

7.3.10 Reporting Requirements

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

- a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.3.3, 7.3.5, or 7.3.6. The notification shall include:
 - i. Identification of the limit that may have been exceeded.
 - ii. Duration of the possible exceedance.
 - iii. An estimate of the amount of emissions in excess of the applicable standard.
 - iv. A description of the cause of the possible exceedance.
 - v. When compliance was reestablished.
- b. Reporting of Malfunctions and Breakdowns

- i. Pursuant to 35 IAC 201.263, the Permittee shall immediately report to the Illinois EPA, Compliance Section and Regional Field Office by telephone or fax concerning continued operation of an emission source during a malfunction or breakdown of the emission source or related pollution control equipment when such continued operation would cause a violation of the standards or limitations of this Permit, the Act or regulations promulgated thereunder.
 - ii. Pursuant to 35 IAC 201.302, upon achievement of compliance, the Permittee shall give a written follow-up report within five (5) business days to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event and explanation why continued operation of the emission source was necessary, the length of time during which operation continued under such conditions, the measures by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed or when the emission source was taken out of service.
- c. The Permittee shall submit the following information along with its annual emission report:
- i. A summary of exceedances of the limits in Conditions 7.3.3, 7.3.5, or 7.3.6, if any, which required notification to the Compliance Section in accordance with Condition 7.3.10(a).
 - ii. A summary of malfunctions and breakdowns which required notification to the Compliance Section in accordance with Condition 7.3.10(b).

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected electric arc furnace without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the type of metal processed in an affected electric arc furnace, provided the furnace continues to comply with the Conditions in Section 7.3 of this permit.

7.3.12 Compliance Procedures

- a. Compliance with Condition 7.3.3(c) is considered to be assured by compliance with the operational and production limits and work practices in Condition 7.3.5(a) and the inherent nature of the operations at this source, as demonstrated by historical operation.
- b. Compliance with Condition 7.3.3(d) (35 IAC 212.448) and 7.3.3(e) (35 IAC 212.322) shall be demonstrated by the operational and production limits and work practices in Condition 7.3.5(b) and (c), the recordkeeping requirements in Condition 7.3.9(a) and (b), and the emission calculation procedures described in Condition 7.3.12(c)(i).
- c. Emissions shall be determined based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below. Note: Any emission test data from a representative emission source or more recent emission factor may be used:
 - i. Emission factors for the affected electric arc furnaces resulting from metal melting, refining, charging, tapping and slagging:

<u>Pollutant</u>	<u>Emission Factors</u>	<u>Control Efficiency</u>
PM	11.3 (lb/T)	99% (baghouse)
CO	18.0 (lb/T)	0
NO _x	0.20 (lb/T)	0

These are emission factors determined for the affected electric arc furnaces resulting from metal melting, refining, charging, tapping and slagging. PM emission factors are from AP-42 Table 12.5-1, CO emission factors are from AP-42 Table 12.3-3, and NO_x emission factors are from AP-42 Table 12.12-2.

Emissions formula for the affected electric arc furnaces resulting from metal melting, refining, charging, tapping and slagging:

$$\text{Appropriate Emissions (ton)} = \text{Steel production Rate (ton)} \times \text{The Appropriate Emission}$$

$$\frac{\text{Factor (lb/ton)} \times (1 - \text{Control Efficiency})}{\div 2,000 \text{ (lb/ton)}}$$

- ii. Emission factors for the affected electric arc furnaces resulting from burning natural gas:

<u>Pollutant</u>	<u>Emission Factors</u> (lb/mmscf)
NO _x	100.0
PM	7.6
SO ₂	0.6
VOM	5.5
CO	84.0

These are emission factors determined for the affected electric arc furnaces resulting from burning natural using AP-42 emission factors for natural gas combustion.

Emissions formula for the affected electric arc furnaces burning natural gas:

$$\text{Appropriate Emissions (ton)} = \frac{\text{natural gas consumed (scf)} \times \text{The Appropriate Emission Factor (lb/mmscf)}}{\div 1,000,000 \text{ (scf/mmscf)} \div 2,000 \text{ (lb/ton)}}$$

7.4 Teeming, Scarfing, and Shotblasting Processes

7.4.1 Description

The scarfing process is performed to smooth out rough edges on the face of metal ingots using a torch. Emissions of PM from the scarfing processes are controlled by a baghouse. The teeming process is the action of pouring steel into molds to solidify. Emissions of PM will result from this process. Shotblasting is a process used to clean metal forgings. Emissions of PM from shotblasting are controlled by a baghouse.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Scarfing Station	Ingot Surface Preparation Processes	Baghouse 646401A
Shotblast 6262500	Cleaning of Steel Forgings	Baghouse 626250A
Teeming 4848400	Pouring liquid steel into a mold to solidify	None

7.4.3 Applicability Provisions and Applicable Regulations

- a.
 - i. An "affected process" for the purpose of these unit-specific conditions, is a process described in Conditions 7.4.1 and 7.4.2.
 - ii. The "affected scarfing process" for the purpose of these unit-specific conditions, is the scarfing process described in Conditions 7.4.1 and 7.4.2.
 - iii. The "affected shotblasting process" for the purpose of these unit-specific conditions, is the shotblasting process described in Conditions 7.4.1 and 7.4.2.
 - iv. The "affected teeming process" for the purpose of these unit-specific conditions, is the teeming process described in Conditions 7.4.1 and 7.4.2.
- b. The affected processes are subject to the emission limits identified in Condition 5.2.2.
- c. No person shall cause or allow the emission of particulate matter into the atmosphere in any one

hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 1) [35 IAC 212.322(a)].

- d. All hot scarfing machines shall be controlled by pollution control equipment. Emissions from said pollution control equipment shall not exceed 69 mg/dscm (0.03 gr/dscf) during hot scarfing operations [35 IAC 212.451].

7.4.4 Non-Applicability of Regulations of Concern

None

7.4.5 Operational and Production Limits and Work Practices

- a. Emissions of particulate matter from the affected scarfing and shotblasting processes shall be vented to a baghouse at all times when they in operation.
- b.
 - i. The Permittee shall follow good operating practices and procedures for fabric filters in the baghouses, including periodic inspections, routine maintenance, and prompt repair of defects.
 - ii. The Permittee shall maintain an adequate supply of replacement filters on the premises of the source.

7.4.6 Emission Limitations

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

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected processes to demonstrate compliance with Conditions 5.5.1, 7.4.3, 7.4.5, and 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain the following records to demonstrate good operating practices and procedures for the baghouses:
 - i. Records for periodic inspection of the fabric filters with date, individual performing the inspection, and the nature of the inspection.
 - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired and nature of repair.
- b. The Permittee shall maintain records of the following items to demonstrate compliance with Condition 7.4.3(c) (35 IAC 212.322):
 - i. Steel scarfing rate, ton/hr and ton/year.
 - ii. Steel production rate, ton/hr and ton/year.
 - iii. Shotblast rate, ton/hr and ton/year.
 - iv. Emissions of PM from each affected process as calculated by the emission calculation procedures described in Condition 7.4.12(c), lb/hr and ton/yr.
- c. The Permittee shall maintain a record of the manufacturer's specifications of the bag filters controlling the affected scarfing process to demonstrate compliance with Condition 7.4.3(d).
- d. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.4.3, 7.4.5, or 7.4.6, which shall include:
 - i. Identification of the limit that may have been exceeded.
 - ii. Duration of the possible exceedance.
 - iii. An estimate of the amount of emissions in excess of the applicable standard.

- iv. A description of the cause of the possible exceedance.
- v. When compliance was reestablished.

7.4.10 Reporting Requirements

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

- a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.4.3, 7.4.5, or 7.4.6. The notification shall include:
 - i. Identification of the limit that may have been exceeded.
 - ii. Duration of the possible exceedance.
 - iii. An estimate of the amount of emissions in excess of the applicable standard.
 - iv. A description of the cause of the possible exceedance.
 - v. When compliance was reestablished.
- b. The Permittee shall submit the following information along with its annual emission report:
 - i. A summary of exceedances of the limits in Conditions 7.4.3, 7.4.5, or 7.4.6, if any, which required notification to the Compliance Section in accordance with Condition 7.4.10(a).

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected process without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.4.3(c) (35 IAC 212.322) shall be demonstrated by the operational and production limits and work practices in Condition 7.4.5(a) and (b), the recordkeeping requirements in Condition 7.4.9(a) and (b), and the emission calculation procedures described in Condition 7.4.12(c).
- b. Compliance with Condition 7.4.3(d) (35 IAC 212.451) shall be demonstrated by the recordkeeping requirement of Condition 7.4.9(c).
- c. Emissions shall be determined based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below. Note: Any emission test data from a representative emission source or more recent emission factor may be used:

Emission factors for the affected processes:

Affected Process	Pollutant	Emission Factor	Control Efficiency
Scarfiging	PM	0.07 (lb/ton)	99% (Baghouse)
Teeming	PM	0.07 (lb/ton)	0
Shotblasting	PM	5.5 (lb/ton)	99% (Baghouse)

These are emission factors determined for the affected processes using AP-42 emission factors for steel production.

Emissions formula for the affected processes:

Scarfiging:

Emissions (ton) = Steel scarfiging rate (ton) x
Scarfiging Emission Factor (lb/ton) x (1-0.99) ÷ 2,000
(lb/ton)

Teeming:

Emissions (ton) = Steel production rate (ton) x
Teeming Emission Factor (lb/ton) ÷ 2,000 (lb/ton)

Shotblasting:

Emissions (ton) = Shotblast rate (ton) x Shotblasting
Emission Factor (lb/ton) x (1-0.99) ÷ 2,000 (lb/ton)

7.5 Quench Oil Tank

7.5.1 Description

In the quench oil tank, hot steel forgings are rapidly cooled by immersing them into an oil quenchant.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Quench Oil Tank 6262400	Cooling of hot forgings in oil quenchant	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected quench oil tank" for the purpose of these unit-specific conditions, is a quench oil tank described in Conditions 7.5.1 and 7.5.2.
- b. The affected quench oil tank is subject to the emission limits identified in Condition 5.2.2.
- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from the affected quench oil tank, except as provided in the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

7.5.4 Non-Applicability of Regulations of Concern

None

7.5.5 Operational and Production Limits and Work Practices

None

7.5.6 Emission Limitations

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

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected quench oil tank to demonstrate compliance with Conditions 5.5.1, 7.5.3, 7.5.5, and 7.5.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the following items to demonstrate compliance with Condition 7.5.3(c) (35 IAC 218.301):
 - i. Usage of oil in the affected quench oil tank, lb/month and lb/year.
 - ii. Hours of operation of the affected quench oil tank, hrs/month and hrs/year.
 - iii. Emissions of VOM from the affected quench oil tank as calculated by the procedure described in Condition 7.5.12(b).
- b. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.5.3, 7.5.5, or 7.5.6, which shall include:
 - i. Identification of the limit that may have been exceeded.
 - ii. Duration of the possible exceedance.
 - iii. An estimate of the amount of emissions in excess of the applicable standard.
 - iv. A description of the cause of the possible exceedance.
 - v. When compliance was reestablished.

7.5.10 Reporting Requirements

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

- a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.5.3, 7.5.5, or 7.5.6. The notification shall include:
 - i. Identification of the limit that may have been exceeded.
 - ii. Duration of the possible exceedance.
 - iii. An estimate of the amount of emissions in excess of the applicable standard.
 - iv. A description of the cause of the possible exceedance.
 - v. When compliance was reestablished.
- b. The Permittee shall submit the following information along with its annual emission report:
 - i. A summary of exceedances of the limits in Conditions 7.5.3, 7.5.5, or 7.5.6, if any, which required notification to the Compliance Section in accordance with Condition 7.5.10(a).

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected quench oil tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.5.12 Compliance Procedures

- a. Compliance with the requirements of Condition 7.5.3(c) shall be demonstrated by the recordkeeping requirements in Condition 7.5.9(a) and the emission calculations described in Condition 7.5.12(b).
- b. The emission rate from the affected quench tank shall be determined based on the recordkeeping requirements in Condition 7.5.9 and the emission formulas listed below:

Emission rate (lb/hr) = Oil Usage (lb/month) ÷ hours
of operation (hrs/month)

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after September 6, 2000 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this

permit, provided that [Section 39.5(12)(a)(i) of the Act]:

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

8.5 Testing Procedures

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

of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)

P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

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

iii. Illinois EPA - Air Permit Section (MC 11)

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

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

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain

compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

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

9.11 Permanent Shutdown

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

removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Emissions of Particulate Matter from Existing Process Emission Units

10.1.1 Process Emission Units for Which Construction or Modification Commenced Prior to After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

where:

P = Process weight rate; and
 E = Allowable emission rate; and,

- i. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

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

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

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

c. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

10.2 Attachment 2 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

NAF:psj