

217/782-2113

CERTIFIED MAIL

REQUEST FOR ADDITIONAL INFORMATION

June 12, 2000

Nichols Aluminum Lincolnshire  
Attn: Gary Stimpson  
200 Schelster Road  
Lincolnshire, Illinois 60069

Application No.: 96050019  
I. D. No.: 097095AAB  
Applicant's Designation:  
Received: May 6, 1996  
Operation of: Aluminum Rolling Mills and Annealing Furnaces  
Location: 200 Schelster Road, Lincolnshire

The application for Federally Enforceable State Operating Permit (FESOP) referenced above lacks information necessary to determine its compliance with Illinois Environmental Protection Act, Section 39.5.

The application cannot be fully evaluated until the following information is supplied:

1. Requested limits on volatile organic material (VOM) emissions constitute a small fraction of the requested limits on the usage of the VOM-containing mineral oil and paraffin. Supporting VOM emission calculations refer only to the emissions from rolling mills and do not address possible VOM emissions from annealing ovens resulting from evaporation of residual oils and solvents present on the foil. Please provide justification of VOM emission based on the stack test data or material balance between VOM purchased and VOM leaving the plant with the product and in waste materials.
2. Detailed description of the operations using perlite and calculations of particulate matter emission resulting from these operations.
3. Proposed production limits for Mill #2 and substantiated emission calculations.
4. Evaluation of the capture efficiency of the control systems on the rolling mills #1 and #2 during the stack tests performed on the mills.

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Failure to supply this information by July 25, 2000 may require the Illinois EPA to deny this permit application. Two copies of this information are required and will serve as a supplement to your application.

Please reference the application and I.D. numbers assigned above on any submission of additional information or any correspondence concerning this matter.

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

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

DES:VJB:psj

cc: Region 1



3. Operations and emissions of the seven annealing furnaces shall not exceed the following limits:

a. Lubricant oil evaporation emission:

Aluminum Throughput		Emission Factor (Lb/Ton)	VOM Emissions	
(Tons/Mo)	(Tons/Yr)		(Tons/Mo)	(Tons/Yr)
19,000	188,500	0.088	0.8	8.3

b. Natural gas combustion emissions:

Natural gas usage: 20.5 mmscf/Mo, 246.0 mmscf/Yr

Pollutant	Emission Factor (Lb/mmscf)	Emissions	
		(Tons/Mo)	(Tons/Yr)
Nitrogen Oxides (NO <sub>x</sub> )	100	1.0	12.3
Carbon Monoxide (CO)	84	0.9	10.3
Particulate Matter (PM)	7.6	0.08	0.9
Volatile Organic Material (VOM)	5.5	0.06	0.7

These limits are based on the maximum production rate and emission factors derived from the stack test for evaporating losses and standard emission factors for combustion emissions. 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.

4. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

5. The Permittee shall maintain monthly records of the following items:

- a. Aluminum process rate (tons/month and tons/year);
- b. Names and amounts of lubricating oils used (tons/month and tons/year) and their VOM content (wt. %);
- c. Natural gas usage (mmscf/month and mmscf/year);
- d. VOM emission calculations (tons/month and tons/year).

6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA or USEPA request for records during the course of a source inspection.
7. If there is an exceedance of the requirements of this permit, as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released, a copy of the relevant records, and a description of the exceedance or violation, and efforts to reduce emissions and future occurrences.
8. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year:
  - a. Aluminum process rate (ton/yr);
  - b. Names and amounts of lubricating oils used (ton/yr);
  - c. Natural gas usage (mmscf/mo, mmscf/yr).
9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

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

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

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

It should be noted that this permit has been revised to reflect changes in the production rates without any increase in emissions.

This revision does not relax monitoring, recordkeeping, or reporting requirements contained in federally enforceable conditions of this permit. These permit conditions assure that this source would not be a major source for purpose of CAAPP.

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

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

DES:VJB:psj

cc: Illinois EPA, FOS Region 1  
Illinois EPA, Compliance Section  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the aluminum processing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is processing of 275,000 tons of aluminum and burning 246 mmscf of natural gas per year. The resulting maximum emissions are well below the levels, e.g., 25 tons per year for VOM at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

1. Operations and emissions of rolling mill shall not exceed the following limits:

Aluminum Throughput (Ton/Mo) (Ton/Yr)		Emission Factors (lb/ton)		E M I S S I O N S			
		VOM	PM	VOM (Ton/Mo) (Ton/Yr)		PM (Ton/Mo) (Ton/Yr)	
30,000	240,000	0.13	0.16	2.0	15.6	2.4	19.2

2. Operations and emissions of the seven annealing furnaces shall not exceed the following limits:

- a. Lubricant oil evaporation emission:

Aluminum Throughput		Emission Factor (Lb/Ton)	VOM Emissions	
(Tons/Mo)	(Tons/Yr)		(Tons/Mo)	(Tons/Yr)
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3. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.