

PROPOSED CAAPP PERMIT  
December 23, 2005

217/782-2113

"RENEWAL"  
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Allied Tube and Conduit Corporation  
Attn: James C. Skalon  
16100 South Lathrop Avenue  
Harvey, Illinois 60426

I.D. No.: 031111ABD  
Application No.: 96030169

Date Received: October 1, 2004  
Date Issued: TO BE DETERMINED  
Expiration Date<sup>1</sup>: TO BE DETERMINED

Operation of: Steel Tubing, Pipes, and Struts Manufacturing  
Source Location: 16100 South Lathrop Ave., Harvey, Cook County  
Responsible Official: Vijay B. Patel, Vice-President of Operations

This permit is hereby granted to the above-designated Permittee to OPERATE a Steel Tubing, Pipes, and Struts Manufacturing Operation, 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 Dan Punzak at 217/782-2113.

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

DES:DGP:psj

cc: Illinois EPA, FOS, Region 1  
CES  
Lotus Notes

<sup>1</sup> Except as provided in Conditions 1.5 and 8.7 of this permit.

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1.0 INTRODUCTION

1.1 Source Identification

Allied Tube and Conduit Corporation  
16100 South Lathrop Avenue  
Harvey, Illinois 60426  
708/339-1610 - Ext. 7435

I.D. No.: 031111ABD

Standard Industrial Classification: 3317, 3644 and 3479: Steel Pipe and Tubes

1.2 Owner/Parent Company

Allied Tube and Conduit Corporation  
16100 South Lathrop Avenue  
Harvey, Illinois 60426

1.3 Operator

Allied Tube and Conduit Corporation  
16100 South Lathrop Avenue  
Harvey, Illinois 60426

Vijay B. Patel  
708/339-1610

1.4 Source Description

Allied Tube and Conduit is located at 16100 South Lathrop Avenue in Harvey, Cook County. Allied operates a steel tubes, pipes and struts manufacturing plant. The principal source of emissions is volatile organic material from coating the products. Two boilers also supply heat.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains "Title I conditions" that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BACT	Best Available Control Technology
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO <sub>2</sub>	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 CONDITIONS FOR 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:

Hydrochloric acid aboveground storage tank.  
Acetone storage tank.

- 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)].

Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

#### 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 5.3.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 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 (see Attachment 2) and 35 IAC Part 266. 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.

- 3.2.2 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 .301,

which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

- 3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.
- 3.2.4 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 218.182.
- 3.2.5 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia at 70 °F, the Permittee shall comply with the applicable requirements of 35 IAC 218.122, which requires use of a permanent submerged loading pipe, submerged fill, or a vapor recovery system.
- 3.2.6 For each organic material emission unit that is exempt from 35 IAC 218 Subpart TT, the Permittee shall maintain emissions of VOM to the atmosphere less than or equal to 2.3 Mg (2.5 tons) per calendar year. The total emissions from emission units (including insignificant and significant activities) not complying with 35 IAC 218 Subpart TT shall not exceed 4.5 Mg (5.0 tons) per calendar year.

### 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	Year Constructed	Emission Control Equipment
Section 7.1			
01	Mill # 1	Pre-1972	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-1)
02	Mill # 2	Pre-1972	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-2)
03	Mill # 3	Pre-1972	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-1)
04	Mill # 4	Pre-1972	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-1)
05	Mill # 5	Pre-1972	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-1)
06	Mill # 6	Pre-1972	Baghouse (CE-9), Scrubber (CE-6), and HEAF Filter (CE-2)
07	Mill # 7	1995	Baghouse (CE-4), Scrubber (CE-6), and HEAF Filter (CE-3)
08	Mill # 8	1993	Baghouse (CE-10)
09	Pickling Line	1996	Wet Scrubber(CE-11)
Section 7.2			
10	Paint Mixing Room	1976	Baghouse (CE-8)
Section 7.3			
11	Boiler # 1	1996	None
12	Boiler # 2	1996	None

5.0 **OVERALL SOURCE CONDITIONS**

5.1 Applicability of Clean Air Act Permit Program (CAAPP)

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

5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate) and PM<sub>2.5</sub>, and attainment or unclassifiable for all other criteria pollutants (CO, NO<sub>x</sub>, SO<sub>2</sub> and lead).

5.3 Source-Wide Applicable Provisions and Regulations

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

5.3.2 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.
- b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

5.3.3 Fugitive Particulate Matter Operating Program

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

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

#### 5.3.4 Ozone Depleting Substances

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

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

#### 5.3.5 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

#### 5.3.6 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B 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 Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).
- 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 regulations under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B that were promulgated after the date issued of this permit.

### 5.3.7 NESHAP Requirements

#### 5.3.7.1 Miscellaneous Metal Part and Products

- a. The final rule for Surface Coating of Miscellaneous Metal Parts and Products (MMPP) under the NESHAP, 40 CFR 63 Subpart Mmmm (40 CFR 63.3880 through 63.3981 plus Four Tables and an Appendix) was published on January 2, 2004. An existing source has until January 2, 2007 to achieve compliance with the HAP emission rules.
- b. The MMPP coating operations must comply by limiting the amount of HAPs in the coating as a maximum specified percent of the coating solids with variations for the type of coating with an averaging period of 12 months (40 CFR 63.3890) or by the use of control equipment. The Permittee does not currently have control equipment that would enable it to comply by reducing the amount of HAPs through the use of control equipment. If control equipment is installed a construction permit for such equipment must be obtained. There are no work practice standards if the compliant material option is chosen, but there are work practice standards if control equipment is used to comply [40 CFR 63.3893].
- c. As of the dates required by the rule, the Permittee shall comply with the following:
  - i. The notification requirements of 40 CFR 63.3910 and the applicable requirements in 40 CFR Subpart A (63.7 to 63.9).
  - ii. The recordkeeping requirements of 40 CFR 63.3930.
  - iii. The reporting requirements of 40 CFR 63.3920.
- d. The MMPP coating units that emit HAPs are also subject to the general requirements 40 CFR 63 Subpart A (63.1 to 63.15).
- e. The Permittee has the option to become a minor source of HAPs prior to the final compliance date.
- f. This NESHAP rule was described here in Section 5 but the actual equipment affected is in Section 7.1
- g. The Permittee shall certify compliance with the applicable requirements of Subpart Mmmm as part of the annual compliance certification required by 40 CFR Part 70 or 71 beginning in the year that compliance is required (2007).

#### 5.3.7.2 Industrial Boilers

The final rule for Industrial Boilers and Process Heaters under the NESHAP, 40 CFR 63 Subpart DDDDD, was published on September 13, 2004.

The boilers operated by the Permittee (See Section 7.3) meet the definition of a "large gaseous fuel subcategory" under 40 CFR 63.7575 and therefore pursuant to 40 CFR 63.7506(b) they are only subject to the initial notification requirements in 40 CFR 63.9(b) (i.e., they are not subject to the emission limits, work

practice standards, performance testing, monitoring, startup, shutdown and malfunction plan, site-specific monitoring plans, recordkeeping and reporting requirements of 40 CFR 63 Subpart DDDDD or any other requirements in Subpart A of Part 63).

#### 5.3.8 Episode Action Plan

- a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, 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 and is incorporated by reference into this permit.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.
- d. Any subsequent revisions of the plan shall also be sent to the Cook County Department of Environmental Control.

#### 5.3.9 PM<sub>10</sub> Contingency Measure Plan

Should the actual annual source-wide emissions of PM<sub>10</sub> equal or exceed 15 tons, then the Permittee shall prepare and submit a contingency measure plan reflecting the PM<sub>10</sub> emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented by the Permittee in accordance with 35 IAC 212.704 following notification by the Illinois EPA. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U. This permit may also have to be revised or reopened to address this regulation (see Condition 9.12.2).

#### 5.4 Source-Wide Non-Applicability of Regulations of Concern

Source-wide non-applicability of regulations of concern are not set for this source. However, there may be unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

#### 5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there may be requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

#### 5.6 Source-Wide Production and Emission Limitations

##### 5.6.1 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 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	404.67
Sulfur Dioxide (SO <sub>2</sub> )	0.46
Particulate Matter (PM)	235.64
Nitrogen Oxides (NO <sub>x</sub> )	76.69
HAP, not included in VOM or PM	-----
Total	2.43
	719.89

5.6.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.6.3 Other Source-Wide Emission Limitations

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

5.7 Source-Wide Testing Requirements

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

- a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].
- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own

expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].

- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

#### 5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there may be provisions for unit specific monitoring set forth in Section 7 of this permit.

#### 5.9 Source-Wide Recordkeeping Requirements

##### 5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

##### 5.9.2 Records for HAP Emissions

The Permittee shall maintain records of HAP emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit, pursuant to Section 39.5(7)(b) of the Act.

##### 5.9.3 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.

#### 5.10 Source-Wide Reporting Requirements

##### 5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, 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. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

Annual emissions from the source in excess of the limits specified in Condition 5.6.1, within 30 days of such an occurrence.

#### 5.10.2 Annual Emissions Report

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

#### 5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source. However, there may be provisions for unit specific operational flexibility set forth in Section 7 of this permit.

#### 5.12 Source-Wide Compliance Procedures

##### 5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed by the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

## 6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

### 6.1 Emissions Reduction Market System (ERMS)

#### 6.1.1 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).

#### 6.1.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

#### 6.1.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.1.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 -

September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.1.5.

- i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
  - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.1.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

#### 6.1.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

#### 6.1.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.1.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
  - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

#### 6.1.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:
 

No exceptions
- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
  - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
  - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

#### 6.1.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:

- i. Actual seasonal emissions of VOM from the source;
  - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
  - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
  - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
  - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
  - vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.1.8 Allotment of ATUs to the Source

- a. i. The allotment of ATUs to this source is 1,529 ATUs per seasonal allotment period.
- ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 173.73 tons per season.
- iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.1.10 of this permit.
- iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
- v. Condition 6.1.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

- b. Contingent Allotments for New or Modified Emission Units  
None
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
  - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
  - ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
  - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.1.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.1.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.1.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
  - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
  - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
  - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

None

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions

reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Mills 1 to 8

7.1.1 Description

The plant produces galvanized steel tube and conduit for use in electrical installations, fencing, liquid transport systems and sprinkler systems. Allied produces various sized (1/2"-5") galvanized steel tubing and electrical conduit on eight production lines or mills. Steel types consist of cold roll, hot band and hot rolled pickle and oil steel and are purchased in various widths and gauges. To prepare the steel for production, Allied cuts the steel coils to exact widths demanded for tubing diameter specifications. The new, separated individual slit coils are then recoiled, banded and loaded onto a "spool" that feeds the strip into the tube mill.

The first step in the tubing manufacturing process is the cleaning of the flat steel strip with a 5%-7% alkaline solution and then formed into its tubular shape. To weld the tube closed, Allied uses Electric Resistance Welding and High Frequency Welding. In each case, only the immediate weld seam area is heated, and the weld is made without any additional material.

Once welded, the next step in the process involves a special process to coat the inside surface of the tube, when desired, with special zinc-rich or proprietary high quality corrosion-resistant coatings. This process is only performed on Mills 1-7.

After painting, scarfing of the exterior weld area is performed. The exterior of the tube is then cleaned again with alkali, rinsed off with water and cleaned a final time with a hydrochloric acid solution prior to galvanizing. The tube then passes through an electric induction box and through a zinc galvanizing tank where molten zinc is applied to the exterior surface of the tube. Zinc galvanizing tanks on Mills 1, 2, 3, 4 and 7 are electrically heated while the galvanizing tanks on Mills 5 and 6 are heated by natural gas. Mill 8 does not have a galvanizing tank.

Immediately following the galvanizing process, the tube is quenched with recirculating water and passed through a second set of rollers that size the tubing to exact outside diameter specifications. Following this process, a chromic acid conversion coating is applied to the exterior zinc surface of the tube on Mills 1-7 only. The tubing is then coated with an exterior lacquer. Mills 1-8 all utilize water-based lacquers.

Finally, the tubing is cut to length by an automatic cut-off machine. The pipes are stacked in bundles and a water-based coating is applied to the cut-off end of the tube and sent to the warehouse for storage until final shipment.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
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Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Mill # 1	Pre-1972	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-1)
02	Mill # 2	Pre-1972	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-2)
03	Mill # 3	Pre-1972	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-1)
04	Mill # 4	Pre-1972	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-1)
05	Mill # 5	Pre-1972	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-1)
06	Mill # 6	Pre-1972	Baghouse (CE-9), Scrubber (CE-6), and HEAF Filter (CE-2)
07	Mill # 7	1995	Baghouse (CE-4), Scrubber (CE-6), and HEAF Filter (CE-3)
08	Mill # 8	1993	Baghouse (CE-10)
09	SMPF Pickling Line	1996	Wet Scrubber (CE-11)

7.1.3 Applicable Provisions and Regulations

- a. The "affected mills" for the purpose of these unit-specific conditions, are mills described in Conditions 7.1.1 and 7.1.2. The mill operations may include galvanizing, cleaning, metalizing and acid treatment but specifically include coating of the tubes.
- b. Mills 1 to 8 at the source are subject to 35 IAC 212 Subpart L. Mills 1 to 6 are subject to 35 IAC 212.322 while Mills 7 and 8 are subject to 35 IAC 212.321. The formula for calculating PM emissions for either of these rules are listed in Attachment 2.
- c. Each affected mill at the source is subject to 35 IAC 218.204(j)(1): Miscellaneous Metal Parts and Product - Clear coating and 218.204(j)(2)(A): Miscellaneous metal Parts and Product extreme performance air dried coating, which provides that:
  - i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products Coating. The following emission limitation

is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>Description</u>	<u>kg/liter</u>	<u>lbs/gallon</u>
Clear Coating	0.52	4.3
Air Dried	0.42	3.5

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.
- d. All 8 mills are subject to 40 CFR 63 Subpart M. This rule was earlier described in Condition 5.3.7 as it has a future compliance date.
- e. The affected SMPF pickling line is subject to 40 CFR 63 Subpart CCC, NESHAP for steel pickling, and the applicable sections of general provisions of Subpart A. The Permittee's operation is considered to be an existing batch line. Existing pickling lines, whether batch or continuous, shall not cause or allow to be discharged into the atmosphere from the affected pickling line:
  - i. Any gases that contain HCl in a concentration in excess of 18 ppm by volume (ppmv) [40 CFR 63.1157(a)(1)]; or
  - ii. HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent [40 CFR 63.1157(a)(2)]. Note that Condition 7.1.6(d) requires an emission reduction of 98%, as evidenced by immediate compliance with the operational, work practice, and monitoring requirements of Condition 7.1.5

7.1.4 Non-Applicability of Regulations of Concern

- a. Each affected mill's coating operation is not subject to 35 IAC 218.301, use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material which excludes coating lines from these requirements.
- b. Each affected mill's chromic acid application process is not subject to 40 CFR Parts 9 and 63: National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks because the facility does not perform any plating operation.
- c. The requirements for hydrochloric acid regeneration plants as part of the pickling line do not apply because the pickling line does not include a regeneration plant. (40 CFR 63.1157)
- d. The affected SMPF pickling line is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected pickling line is

subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

7.1.5 Control Requirements and Work Practices

- a. The wet scrubber on the SMPF pickling line shall be operated to reduce HCl emissions by 98% and achieve the emissions limit in Condition 7.1.6(d).
- b. 40 CFR 63.1159(b) has the following requirements for hydrochloric acid storage: The owner or operator of an affected vessel shall provide and operate, except during loading and unloading of acid, a closed-vent system for each vessel. Loading and unloading shall be conducted either through enclosed lines or each point where the acid is exposed to the atmosphere shall be equipped with a local fume capture system, ventilated through an air pollution control device.
- c. The Permittee shall comply with the operation and maintenance requirements of 40 CFR 63.6(e) including implementation of the Startup, Shutdown, and Malfunction Plan required by Section 63.6(e) (3). [40 CFR 63.1160(b) (1) and (2)]
- d. The Permittee shall comply with the other maintenance requirements of 40 CFR 63.1160(b).
  - i. Follow the manufacturer's recommended maintenance practices at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
  - ii. Clean the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling;
  - iii. Conduct an inspection of each scrubber at intervals of no less than 3 months with:
    - A. Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
    - B. Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
    - C. Repair or replacement of droplet eliminator elements as needed;
    - D. Repair or replacement, if needed, of heat exchanger elements used to control the

temperature of fluids entering or leaving the scrubber; and

- E. Adjustment of damper settings for consistency with the required air flow.
- iv. If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Illinois EPA may be used; and
- v. The owner or operator shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirements of this subpart.
- e. The Permittee shall monitor the pressure drop across the SMPF pickling line scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance. [40 CFR 63.1160(b)(2)(i)]
- f. Each monitoring device shall be certified by the manufacturer to be accurate within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year. [40 CFR 63.1162(a)(5)]
- g. The Permittee shall, in accordance with the scrubber manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the HCl pickling line water scrubber such that the scrubber is kept in proper working condition and will not cause a violation of the emission limit included in Condition 7.1.6(d)(i).

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected mills are subject to the following:

- a. i. Material usage and emissions from Mill 7 shall not exceed the following limits [T1]:

VOM Usage		VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
5.5	44.4	5.5	44.4

These limits are based on maximum coating usage, VOM content (lb VOM/gallon) of each coating, and emissions were determined by material balance.

- ii. 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.
  - iii. Only non-VOM cleanup solvent shall be used on Mill 7.
- b. i. Emissions and VOM usage from Mill 8 shall not exceed the following limits [T1]:

VOM Usage		VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
1.58	12.6	1.58	12.6

These limits are based on maximum coating usage, VOM content (lb VOM/gallon) of each coating, and emissions were determined by material balance.

- ii. 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.
- c. i. Total combined emissions and VOM usage from Mills 1 to 6 shall not exceed the following limits [T1]:

Coating and Cleanup Solvent VOM Usage		Coating and Cleanup Solvent VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
43.3	343.4	43.3	343.4

These limits are based on maximum coating and cleanup solvent usage, VOM content (lb VOM/gallon) of each coating, and by material balance.

- ii. 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.
  - iii. The above limitations (a, b and c) were established in Permit 95030157, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].
- d. i. Emissions and operation of hydrochloric acid SMPF push-pull pickling line shall not exceed the

following limits as established in Construction Permit 96110019 [T1].

HCl Liquid Usage		HCl Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
526	6,303	0.13	1.58

These limits are based on the maximum hydrochloric acid usage, reaction of some acid, credit for disposal of weak acid and evaporation of HCl aerosol and 98% control efficiency by the water scrubber as determined during an emissions test on a similar process.

- ii. Compliance with annual limits shall be determined on a calendar year basis.
- iii. The above limitations were established in Permit 96110019, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

#### 7.1.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), and Section 39.5(7)(b) of the Act]

- a. On an annual basis, the VOM content of specific coatings and cleaning solvents used on each affected coating operation shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 281.105(a).
  - i. The VOM content of representative coatings 'as applied' on the affected coating operation shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
  - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent.

- b. Upon request by the Illinois EPA, the Permittee shall conduct an emissions test to verify the relationship between the control equipment (i.e., baghouse, scrubber, HEAF filter) operating parameters and control equipment performance.
- c. The specific test methods and other details of establishing SMPF scrubber operating parameters during the emissions test are described in 40 CFR 63.1161. The Permittee must obtain written approval of the test plan.

Notification of the performance test must be made 60 days in advance. [40 CFR 63.1163(d)]

- d. In addition to the initial emissions test, a similar performance test shall be conducted either annually or in accordance with an alternative schedule approved by the Illinois EPA that allows testing every 2½ years [40 CFR 63.1162(a)(i)]. The Illinois EPA approves an alternate test schedule of testing with 2½ years between tests. If the test plan for these later emissions tests is the same as the original plan, written approval of the test plan is not required.
- e. Submittal of the test results shall include all SMPF scrubber operating parameters measured during the test.

7.1.8 Monitoring Requirements

- a. The Permittee shall monitor the following on a regular basis in order to ensure proper operation of the control equipments:
  - i. The Permittee shall maintain pressure drop monitoring devices on each control unit and operate the unit in a range in accordance with vendor's recommendation as follows:

<u>Control Device</u>	<u>Pressure Drop Range in Inches of Water</u>
CE-1 (HEAF)	1.0 to 6.0 and Alarm System
CE-2 (HEAF)	- 3.2 to - 1.6 and Alarm System
CE-3 (HEAF)	0.5 to 1.3 and Alarm System
CE-4 and CE-7 (Baghouse)	Pressure drop range of 1.0 to 6.0 and continuous monitoring of pressure drop range.

<u>Control Device</u>	<u>Pressure Drop Range in Inches of Water</u>
CE-5 and CE-6 (Scrubber)	Set point pressure across the packing, change scrubbant periodically, O & M parameters as per vendors' recommendation.
	Pressure drop range of 1.0 to 7.0 and continuous monitoring of pressure drop range.
CE-8	Pressure drop range of 0.0 to 8.0 and continuous monitoring or pressure drop range.
CE-9 and CE-10	Pressure drop range of 1.0 to 6.0 and continuous monitoring of pressure drop range.

The HEAF units shall be equipped with a device that automatically advances the filter when a set point pressure is reached. If a HEAF unit runs out of filter media an alarm shall sound and a new supply of filter media installed. Operation of the pressure drop device and HEAF system shall be checked weekly.

The baghouse and scrubbers shall be equipped with a continuous pressure drop monitor but a continuous recording device is not required.

- c. Monitoring requirements for the SMPF pickling line are listed in Condition 7.1.5(e) and (f) with other NESHAP requirements.
- d. Compliance Assurance Monitoring (CAM) Requirements

The affected Mills are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3, Tables 3A through 3E pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application.

#### 7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected mills to demonstrate compliance with Conditions 5.6.1, 7.1.3, 7.1.5 and 7.1.6 pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall collect and record the following items each day:
  - i. A list giving the name and identification number of each coating as applied, dilution solvent, clean-up solvent, and any other material used containing VOM.
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempt from the definition of VOM) as applied.
  - iii. The Permittee shall keep records of the final test results conducted by the Permittee for each representative coating "as applied".
- b. The Permittee shall collect and record the following items for Mills 1 to 6 as a group, and individual records for Mill 7 and Mill 8.
  - i. VOM content in weight percent for each material used containing VOM.
  - ii. Density in pounds per gallon of each material used containing VOM.
  - iii. Actual usage of coatings, solvent and any other material used containing VOM in ton/month and ton/year.
  - iv. Emissions of VOM in tons/month and tons/year.
- c. The Permittee shall collect and record cleanup solvent usage for Mills #1 to 6 in tons/month and tons/year. VOM emissions from cleanup solvents shall be calculated from the difference in cleanup solvents taken from inventory and reclaimed cleanup solvents sent to temporary storage for ultimate outside disposal.
- d. Records of the testing of VOM content (wt. %) of each coating and cleaning solvent as tested pursuant to the conditions of this section, which include the following [Section 39.5(7) (e) of the Act]:
  - i. Identification of material tested;
  - ii. Results of analysis;
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.
- e. The following records for control devices other than the pickling line scrubber:

- i. Weekly records indicating the proper maintenance of pressure drop monitoring device with alarm system of HEAF units (CE-1, CE-2 and CE-3) and the daily record of pressure drop per the CAM Plan.
  - ii. Record of one daily reading of pressure drop monitoring data of baghouses (CE-4, CE-7, CE-9 and CE-10). A continuous recording is an acceptable alternative.
  - iii. Record of one weekly reading of pressure drop and log of scrubbant changes and other O & M parameters maintenance of scrubbers (CE-5 and CE-6).
- f. The following records for the SMPF pickling line:
- i. General records as required by 40 CFR 63.10(b)(2) of Subpart A. [40 CFR 63.1165(a)]
    - A. The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
    - B. The occurrence and duration of each malfunction of the air pollution control equipment;
    - C. All maintenance performed on the air pollution control equipment;
    - D. Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the Startup, Shutdown, and Malfunction Plan;
    - E. All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (See Section 63.10(b)(2)(v) of Subpart A);
    - F. All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report,

including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;

- G. All results of initial or subsequent performance tests;
  - H. All documentation supporting initial notification and notifications of compliance status required by Section 63.9 of Subpart A of this part; and
  - I. Records of any applicability determination, including supporting analyses.
- ii. Specific records as required by 40 CFR 63.1165(b).
- A. Scrubber makeup water flow rate and recirculation water flow rate if a wet scrubber is used;
  - B. Calibration and manufacturer certification that monitoring devices are accurate to within 5 percent for the control device(s) used to comply with 40 CFR 63;
  - C. Each maintenance inspection and repair, replacement, or other corrective action; and
  - D. The owner or operator shall keep the written operation and maintenance plan on record after it is developed (i.e. by June 22, 2001) to be made available for inspection, upon request, by the Illinois EPA for the life of the affected source or until the source is no longer subject to the provisions of this 40 CFR 63 Subpart CCC. [40 CFR 63.1165(b) (3)]
- g. A copy of the Startup, Shutdown and Malfunction Plan required by 40 CFR 63.6(e) (3).
- h. Usage of hydrochloric acid (tons/month and tons/year) and HCl emissions (tons/month and tons/year).
- i. PM emissions from all mills combined (ton/mo).
- j. Records for Compliance Assurance Monitoring (CAM) Requirements

The Permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting

information related to the monitoring requirements in Condition 7.1.8(a), as required by 40 CFR 64.9(b)(1).

#### 7.1.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected mills 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:
  - i. The Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.1.3(c) within 30 days of such an occurrence [35 IAC 218.211(d)(3)].
  - ii. Any actions taken during a startup, shutdown or malfunction (including actions to correct a malfunction) that is not consistent with the procedure in the Startup, Shutdown, and Malfunction Plan.
- b. The Permittee shall submit semi-annual reports as required by 40 CFR 63.10(d)(5)(i). [40 CFR 63.1164(c)(2)]
- c. Operation of the affected mills in excess of the limits specified in Condition 7.1.6 within 30 days of such occurrence.
- d. Reporting of Compliance Assurance Monitoring (CAM)

The Permittee shall submit monitoring reports to the Illinois EPA in accordance with Condition 8.6.1 and shall include, at a minimum, the information required under Condition 8.6.1 and the following information [40 CFR 64.6(c)(3), 64.9(a)(1), and (2)]:

- i. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken [40 CFR 64.6(c)(3) and 64.9(a)(2)(i)]; and
- ii. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks [40 CFR 64.6(c)(3) and 64.9(a)(2)(ii)].

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected mills 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:

Usage of coatings or thinners at this source with various VOM contents provided that the materials are tested in accordance with Condition 7.1.7 of this permit and the affected mills remain in compliance with the requirements of this permit.

#### 7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(b) is addressed by the monitoring requirements in Condition 7.1.8(a) and the records required in Condition 7.1.9(e) and (i).
- b. Compliance with Condition 7.1.3(c) is addressed by the testing requirements in Condition 7.1.7(a) and the records required in Condition 7.1.9(a)-(d).
- c. Compliance with Condition 7.1.3(d) is not required until the rule becomes effective on January 2, 2007. Further details of its continuing compliance requirements are discussed in Condition 5.3.7.1.
- d. Compliance with Condition 7.1.3(e) is addressed by the requirements of Condition 7.1.5, the testing requirements in Condition 7.1.7(c)-(e), the monitoring requirements in Condition 7.1.8(b), the records required in Condition 7.1.9(f)-(h) and the reporting requirements of Condition 7.1.10(a)(ii) and (b).
- e. Compliance with Condition 7.1.6(a)-(c) is addressed by the records required in Condition 7.1.9(b).
- f. To determine compliance with Condition 5.6.1, emissions of PM from the affected material transfer units shall be calculated based on the following:

PM Emissions = (Air flow, cfm) x (Estimated Dust Collector Outlet Dust Loading\*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr).

- \* As specified by manufacturer or vendor of the filter or wet scrubber, or air testing of the actual equipment, or air testing of similar equipment at this or other similar operations, or based on the standard emission factors from AP-42.

## 7.2 Paint Mixing Room

### 7.2.1 Description

Allied stores interior (ID) coatings, exterior (OD) coatings and end spray coatings applied during manufacturing. Allied applies most coatings as supplied during manufacturing, however, some of the ID coatings must be specially blended in-house prior to utilization on Mills 1-7. During mixing activities, additional solvent and zinc dust may be added to the coatings. Coatings that require these additions are mixed in large paint vats. As zinc dust is added to the coating in the vats, some of the dust becomes airborne. Excess particulate generated from this activity is captured by hoods affixed to the mixing vats, and zinc dust particulate emissions are controlled by a baghouse. Also, when the coatings and solvents are added to the vats, there are some VOM emissions due to vapor displacement from this area. All VOM emissions are accounted for at the mills.

### 7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
10	Paint Mixing Room	1996	Baghouse (CE-8)

### 7.2.3 Applicable Provisions and Regulations

- a. The "affected paint mixing room" for the purpose of these unit-specific conditions, is a paint mixing room described in Conditions 7.2.1 and 7.2.2.
- b. Each affected paint mixing room at the source is subject to 35 IAC 212.321(a) for emissions of particulate matter. The formula for calculating allowable pursuant to this rule is listed in Attachment 2.
- c. When the NESHAP rule for coating of miscellaneous metal parts and products (40 CFR 63 Subpart M) takes effect on January 2, 2007 there may be work practice standards for the paint mixing room depending upon the method of compliance. See Condition 5.3.7.1.

### 7.2.4 Non-Applicability of Regulations of Concern

- a. An affected mixing room is not subject to 35 IAC 218 Subpart TT: Other Emission Units, because the source has the potential to emit less than 22.7 Mg (25 tons) of VOM per year, in aggregate, from emission units that are:
  - i. Not regulated by 35 IAC 218 Subparts B, E, F, H, Q, R, S, T (excluding Section 218.486), V, X, Y, Z, or BB of this Part, or

- ii. Not included in any of the following categories:  
synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, wood furniture, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations.
- b. The affected mixing room is not subject to 35 IAC 218 Subpart AA because this operation is not engaged in manufacturing paint.
- c. The affected paint mixing room is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected paint mixing room does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.2.5 Control Requirements and Work Practices

Control requirements are not set for the affected paint mixing room. However, there may be requirements for source-wide control requirements set forth in Condition 5.5.

7.2.6 Production and Emission Limitations

Production and emission limitations are not set for the affected paint mixing room.. However, there are source-wide production and emission limitations set forth in Condition 5.6.

7.2.7 Testing Requirements

Upon request by the Illinois EPA, the Permittee shall conduct an emission test to verify relationship between the control equipment (i.e., baghouse pressure drop range) operating parameters and control equipment performance.

7.2.8 Monitoring Requirements

The Permittee shall monitor continuously the pressure drop range across the baghouse (CE-8) as per vendor's recommendation to ensure baghouse is operating within acceptable pressured drop range, but a continuous recording device is not required.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for affected paint mixing room to demonstrate compliance with Condition 5.6.1 and 7.1.3(b), pursuant to Section 39.5(7) (b) of the Act:

- a. Record of one weekly reading of pressure drop monitoring data of baghouse (CE-8).
- b. Record of maximum process weight rate (lb/hr).
- c. PM emissions (ton/yr).

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected paint mixing room with the permit requirements as follows within 30 days, 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.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected paint mixing room. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(b) is addressed by the monitoring requirements in Condition 7.2.8 and the records required in Condition 7.2.9(a)-(c).
- b. To determine compliance with Condition 5.5.1, emissions of PM from the affected material transfer units shall be calculated based on the following:

PM Emissions = (Air flow, cfm) x (Estimated Dust Collector Outlet Dust Loading\*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr).

- \* As specified by manufacturer or vendor of the filter or wet scrubber, or air testing of the actual equipment, or air testing of similar equipment at this or other similar operations, or based on the standard emission factors from AP-42.

### 7.3 Boilers

#### 7.3.1 Description

Boiler 1 and 2 are natural gas fired and the primary source of heat for the plant and for comfort heating.

#### 7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
11	Boiler 1 Natural gas-fired 10.04 mmBtu/hr	1996	None
12	Boiler 2 Natural gas-fired 10.04 mmBtu/hr	1996	None

#### 7.3.3 Applicable Provisions and Regulations

- a. The "affected boilers" for the purpose of these unit-specific conditions, are boilers described in Conditions 7.3.1 and 7.3.2.
- b. Pursuant to 35 IAC 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air. Emission units 11 and 12 are subject to 35 IAC 216.121.
- c. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units constructed, modified, or reconstructed after June 9, 1989, with a design heat input capacity of 10 to 100 mmBtu/hr. Emission units 11 and 12 are subject to 40 CFR 60, Subpart Dc because those two boilers were constructed after the applicability date of June 9, 1989. However, there are no substantive standards since only natural gas is used as a fuel.

#### 7.3.4 Non-Applicability of Regulations of Concern

- a. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, use of organic material. Therefore, emission unit 11 and 12 are not subject to 35 IAC 218.301.
- b. The affected boilers are not subject to 35 IAC 217.121 because they do not have actual heat input greater than 250 mmBtu/hr.

- c. The affected boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected boilers do not use an add-on control device to achieve compliance with an emission limitation or standard and also do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.3.5 Control Requirements and Work Practices

Boilers 1 and 2 shall only be operated with natural gas as the fuel.

7.3.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected boilers are subject to the following:

- a. Emissions and operation of the two boilers (Boiler 1 and 2 combined) shall not exceed the following limits:

Gas Consumption  
(mft<sup>3</sup>/yr)

167.52

<u>Pollutant</u>	<u>Emissions (Tons/Year)</u>
NO <sub>x</sub>	8.8
CO	7.5
PM	0.9
VOM	0.5

These limits are based on maximum gas consumptions. Emissions are determined by using standard emission factors.

- b. Compliance with annual limits only needs to be done annually (calendar year) since operation is based on maximum firing rate and continuous operation.
- c. The above limitations were established in Permit 96110019, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD). The values have been adjusted to reflect newer emission factors. [T1]

7.3.7 Testing Requirements

Testing requirements are not set for the affected boilers. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.3.8 Monitoring Requirements

Monitoring requirements are not set for the affected boilers. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Condition 5.6.1, 7.3.3 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the gas consumption by emission units 11 and 12 in mft<sup>3</sup>/yr.
- b. VOM, PM, CO, and NO<sub>x</sub> emissions from emission unit 11 and 12 in ton/yr.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, 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. Emissions of specified pollutants from the affected boilers in excess of the limits specified in Condition 7.3.6 within 30 days of such occurrence.
- b. Operation of the affected boilers using oil as a fuel, which would violate the requirement in Condition 7.3.5, within 30 days of such occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected boilers. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.3.12 Compliance Procedures

- a. Compliance with Condition 7.3.3(b) is addressed by the inherent emission factor presented below and the records required in Condition 7.3.9(b).

- b. Compliance with Condition 7.3.3(c) is addressed by the requirements of Condition 7.3.5 and the records required in Condition 7.3.9(a) and the reporting requirement of Condition 7.3.10(b).
- c. Compliance with the emission limitation of Condition 7.3.6 is addressed by the records required in Condition 7.3.9(b).
- d. i. Emission factors for the affected boiler when fired by natural gas:

<u>Pollutant</u>	<u>Emission Factors</u> <u>(lb/mmscf)</u>
VOM	5.5
PM	7.6
SO <sub>2</sub>	0.6
NO <sub>x</sub>	100
CO	84

The emission factors (lb/mmscf) are for Natural Gas-Fired Small Boilers (<100 mmBtu/hr Heat Input) from AP-42 Section 1.4 (dated 3/98).

- ii. Emission formula for the affected boiler when fired by natural gas:

$$(\text{Boiler Emissions, lb}) = (\text{The Appropriate Emission Factor, lb/mmscf}) \times (\text{Natural Gas Usage, mmscf})$$

## 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 November 10, 2005 (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 if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA

every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [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 determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;
- e. The test method(s) that 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. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:
  - i. Illinois EPA - Air Compliance Unit  
  
Illinois Environmental Protection Agency  
Bureau of Air  
Compliance & Enforcement Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Quality Planning Section  
  
Illinois Environmental Protection Agency  
Bureau of Air  
Air Quality Planning Section (MC 39)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

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

iv. USEPA Region 5 - Air Branch

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

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

## 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.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7) (j) (iv) of the Act]:

- 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, pursuant to Section 39.5(7) (j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 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, or 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 this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [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 there under.

#### 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 as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

- 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 applicable requirements; 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 regulated 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. At 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 including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a 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, Air Quality Planning 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 Unit, 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 and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 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 [Section 39.5(7)(k) of the Act]:

- 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.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

- 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 [Section 39.5(7)(k)(iv) of the Act].

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

##### 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 that inaccurate statements were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

- d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

#### 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 and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5) (e) and (i) 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. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the 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

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

Note: Pursuant to Sections 39.5(5) (h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

**10.0 ATTACHMENTS**

Attachment 1 Example Certification by a Responsible Official

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

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

Attachment 2 Emissions of Particulate Matter from Process Emission Units

- a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].
- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

where:

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

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

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

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

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

iii. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>T/hr</u>	<u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

ii. 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,

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

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

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

	<u>Metric</u>	<u>English</u>
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

iii. 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
<u>Mg/hr</u>	<u>kg/hr</u>	<u>T/hr</u>	<u>lb/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
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

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

Table 3A	PSEU Designation:	Mill Lines 1-5 (Vent to CE-7)
	Significant Emission Unit Section:	7.1
	Pollutant:	PM

Indicators:	#1: Visible Emissions	#2: Pressure Drop
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Visible emissions from the baghouse exhaust will be monitored daily during operation using EPA Reference Method 22-like procedures	Pressure drop across the baghouse is measured with a differential pressure gauge.
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, correction action, and a reporting requirement. A Method 9 opacity test will also be performed.	An excursion is defined as a pressure drop less than 1.0 or greater than 6.0 in H <sub>2</sub> O. Excursions trigger an inspection, correction action, and a reporting requirement.
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	>5% of daily readings (10 days in a semiannual monitoring period).	>5% of daily reading (10 days in a semiannual monitoring period).

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Measurements are being made at the emission point (baghouse exhaust).	Pressure taps are located at the baghouse inlet and outlet. The gauge is a standard magnahelic-type.
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Not Applicable	Not Applicable
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	The observer will be familiar with Reference Method 22 and follow Method 22-like procedures.	The pressure gauge is checked for accuracy quarterly (readings compared to a separate gauge). Pressure taps are checked for plugging quarterly.
THE MONITORING FREQUENCY:	A 6-minute Method 22-like observation is performed daily during operation.	Pressure drop is monitored continuously.
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	The VE observation is documented by the observer.	Pressure drop is manually recorded daily during operation.
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Not Applicable	Not Applicable

Table 3B	PSEU Designation:	Mill Line 7 (Vent to CE-4)
	Significant Emission Unit Section:	7.1
	Pollutant:	PM

Indicators:	#1: Visible Emissions	#2:
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Visible emissions from the baghouse exhaust will be monitored daily during operation using EPA Reference Method 22-like procedures	Pressure drop across the baghouse is measured with a differential pressure gauge.
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, correction action, and a reporting requirement. A Method 9 opacity test will also be performed.	An excursion is defined as a pressure drop less than 1.0 or greater than 6.0 in H <sub>2</sub> O. Excursions trigger an inspection, correction action, and a reporting requirement.
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	>5% of daily readings (10 days in a semiannual monitoring period).	>5% of daily reading (10 days in a semiannual monitoring period).

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Measurements are being made at the emission point (baghouse exhaust).	Pressure taps are located at the baghouse inlet and outlet. The gauge is a standard magnehelic-type.
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Not Applicable	Not Applicable
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	The observer will be familiar with Reference Method 22 and follow Method 22-like procedures.	The pressure gauge is checked for accuracy quarterly (readings compared to a separate gauge). Pressure taps are checked for plugging quarterly.
THE MONITORING FREQUENCY:	A 6-minute Method 22-like observation is performed daily during operation.	Pressure drop is monitored continuously.
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	The VE observation is documented by the observer.	Pressure drop is manually recorded daily during operation.
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Not Applicable	Not Applicable

Table 3C	PSEU Designation:	Mill Line 6 (Vent to CE-9)
	Significant Emission Unit Section:	7.1
	Pollutant:	PM

Indicators:	#1: Visible Emissions	#2: Pressure Drop
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Visible emissions from the baghouse exhaust will be monitored daily during operation using EPA Reference Method 22-like procedures	Pressure drop across the baghouse is measured with a differential pressure gauge.
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, correction action, and a reporting requirement. A Method 9 opacity test will also be performed.	An excursion is defined as a pressure drop less than 1.0 or greater than 6.0 in H <sub>2</sub> O. Excursions trigger an inspection, correction action, and a reporting requirement.
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	>5% of daily readings (10 days in a semiannual monitoring period).	>5% of daily reading (10 days in a semiannual monitoring period).

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Measurements are being made at the emission point (baghouse exhaust).	Pressure taps are located at the baghouse inlet and outlet. The gauge is a standard magnehelic-type.
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Not Applicable	Not Applicable
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	The observer will be familiar with Reference Method 22 and follow Method 22-like procedures.	The pressure gauge is checked for accuracy quarterly (readings compared to a separate gauge). Pressure taps are checked for plugging quarterly.
THE MONITORING FREQUENCY:	A 6-minute Method 22-like observation is performed daily during operation.	Pressure drop is monitored continuously.
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	The VE observation is documented by the observer.	Pressure drop is manually recorded daily during operation.
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Not Applicable	Not Applicable

Table 3D	PSEU Designation:	Mill Line 8 (Vent to CE-10)
	Significant Emission Unit Section:	7.1
	Pollutant:	PM

Indicators:	#1: Visible Emissions	#2: Pressure Drop
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Visible emissions from the baghouse exhaust will be monitored daily during operation using EPA Reference Method 22-like procedures	Pressure drop across the baghouse is measured with a differential pressure gauge.
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, correction action, and a reporting requirement. A Method 9 opacity test will also be performed.	An excursion is defined as a pressure drop less than 1.0 or greater than 6.0 in H <sub>2</sub> O. Excursions trigger an inspection, correction action, and a reporting requirement.
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	>5% of daily readings (10 days in a semiannual monitoring period).	>5% of daily reading (10 days in a semiannual monitoring period).

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Measurements are being made at the emission point (baghouse exhaust).	Pressure taps are located at the baghouse inlet and outlet. The gauge is a standard magnehelic-type.
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Not Applicable	Not Applicable
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	The observer will be familiar with Reference Method 22 and follow Method 22-like procedures.	The pressure gauge is checked for accuracy quarterly (readings compared to a separate gauge). Pressure taps are checked for plugging quarterly.
THE MONITORING FREQUENCY:	A 6-minute Method 22-like observation is performed daily during operation.	Pressure drop is monitored continuously.
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	The VE observation is documented by the observer.	Pressure drop is manually recorded daily during operation.
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Not Applicable	Not Applicable

Table 3E	PSEU Designation:	Mill Lines 1 to 7 (Vent to CE-1, 2 or 3)
	Significant Emission Unit Section:	7.1
	Pollutant:	PM

Indicators:	#1: Visible Emissions	#2: Pressure Drop
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Visible emissions from the HEAF exhaust will be monitored daily during operation using EPA Reference Method 22-like procedures.	Pressure drop across the baghouse is measured with a differential pressure gauge.
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	An excursion is defined as visible emissions greater than normal. Excursions trigger an inspection and corrective action. Revert to Indicator #2.	An excursion is defined as a pressure drop greater or less than normal range. Excursions trigger an inspection, correction action, and a reporting requirement. The unit comes equipped with an alarm that sounds if the filter media runs out during operation.
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	>5% of daily readings (10 days in a semiannual monitoring period).	>5% of daily reading (10 days in a semiannual monitoring period).

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Measurements are being made at the emission point (HEAF Unit exhaust).	Pressure taps are located at the HEAF Unit inlet and outlet. The gauge is a standard photohelic-type and the filter media automatically advances when the differential pressure reaches an upper level set-point.
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Not Applicable	Not Applicable
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	The observer will be familiar with Reference Method 22 and follow Method 22-like procedures.	The pressure gauge is checked for accuracy quarterly (readings compared to a separate gauge). Pressure taps are checked for plugging quarterly.
THE MONITORING FREQUENCY:	A 6-minute Method 22-like observation is performed daily during operation.	Pressure drop is monitored continuously.
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	The VE observation is documented by the observer.	Pressure drop is manually recorded daily during operation.
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Not Applicable	Not Applicable

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, [www.epa.state.il.us](http://www.epa.state.il.us). This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-revising.pdf](http://www.epa.state.il.us/air/caapp/caapp-revising.pdf)

Guidance On Renewing A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-renewing.pdf](http://www.epa.state.il.us/air/caapp/caapp-renewing.pdf)

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

[www.epa.state.il.us/air/caapp/index.html](http://www.epa.state.il.us/air/caapp/index.html)

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

[www.epa.state.il.us/air/caapp/199-caapp.pdf](http://www.epa.state.il.us/air/caapp/199-caapp.pdf)

[www.epa.state.il.us/air/permits/197-fee.pdf](http://www.epa.state.il.us/air/permits/197-fee.pdf)

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