

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NSPS SOURCE

PERMITTEE

NACME Steel Processing, LLC
Attn: John DuBrock
429 West 127th Street
Chicago, Illinois 60628

Application No.: 05100052

I.D. No.: 031600FWL

Applicant's Designation:

Date Received: October 25, 2005

Subject: Steel Pickling Line Modification

Date Issued:

Expiration Date:

Location: 429 West 127th Street, Chicago, Cook County 60628

This Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of one (1) steel coil pickling line comprised of four (4) pickling tanks and coil washer exhausted to turbo-tunnel enclosure and three (3) 14,000 gallon hydrochloric acid storage tanks all controlled by a scrubber and one (1) steel coil oil coater pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 10 tons/year for any single Hazardous Air Pollutants (HAP), and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
 - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants, 40 CFR 63 Subpart CCC and the NESHAP for Surface Coating of Metal Coil, 40 CFR Part 63, Subpart SSSS.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.

- 2a. The coil coater associated with the steel coil pickling line is subject to the New Source Performance Standards (NSPS) for Metal Coil Surface Coating, 40 CFR 60 Subparts A and TT. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.460(a) and (b), the provisions of 40 CFR 60 Subpart TT apply to the following affected facilities in a metal coil surface coating operation: each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously that commences construction, modification, or reconstruction after January 5, 1981.
 - b. Pursuant to 40 CFR 60.462(a)(1), on and after the date on which 40 CFR 60.8 requires a performance test to be completed, each owner or operator subject to 40 CFR 60 Subpart TT shall not cause to be discharged into the atmosphere more than 0.28 kilogram VOC per liter (kg VOC/l) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s).
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
 - b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
 - c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
 - d. Pursuant to 35 Ill. Adm. Code 212.316(c), no person shall cause or allow fugitive particulate matter emissions from any roadway or parking area to exceed an opacity of 10 percent, except that the opacity shall not exceed 5 percent at quarries with a capacity to produce more than 1 million T/yr of aggregate.
 - e. Pursuant to 35 Ill. Adm. Code 212.316(f), unless an emission unit has been assigned a particulate matter, PM_{10} , or fugitive particulate matter emissions limitation elsewhere in this 35 Ill. Adm. Code 212.316 or in 35 Ill. Adm. Code 212 Subparts R or S, no person shall cause or allow

fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent.

- f. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- g. Pursuant to 35 Ill. Adm. Code 212.324(b), except as otherwise provided in 35 Ill. Adm. Code 212.324, no person shall cause or allow the emission into the atmosphere, of PM₁₀, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period.
- 4a. Pursuant to 35 Ill. Adm. Code 218.204(d), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Coil Coating. Except as otherwise provided in 35 Ill. Adm. Code 218.204(a), (c), (g), (h), (j), (l), (n), (p), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. 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 composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. The emission limitations are as follows:

Coil Coating	kg/l	lb/gal
	0.20	(1.7)

- b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall only apply to photochemically reactive material.
- 5a. This permit is issued based on the steel coil pickling line at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants, 40 CFR 63 Subpart

CCC. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.

- b. This permit is issued based on coil coater associated with the existing steel coil pickling line at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Coil, 40 CFR Part 63, Subpart SSSS. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
- 6a. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- b. Pursuant to 35 Ill. Adm. Code 212.324(d), the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, 35 Ill. Adm. Code 212.324(d) is not a defense finding of a violation of the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c).
- 7a. This permit is issued based on the solvent cleaning operations at this source not being subject to the requirements of 35 Ill. Adm. Code 218.187(b). Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012: Except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations that use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;
- b. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is

required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.

8. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 9a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, 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 required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection

equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;

- vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- e. Pursuant to 35 Ill. Adm. Code 212.324(f), for any process emission unit subject to 35 Ill. Adm. Code 212.324(a), the owner or operator shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 Ill. Adm. Code 212.324 shall be met at all times. 35 Ill. Adm. Code 212.324 shall not affect the applicability of 35 Ill. Adm. Code 201.149. Proper maintenance shall include the following minimum requirements:
- i. Visual inspections of air pollution control equipment;
 - ii. Maintenance of an adequate inventory of spare parts; and
 - iii. Expeditious repairs, unless the emission unit is shutdown.
- 10a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the scrubber and turbo-tunnel enclosure such that scrubber and turbo-tunnel enclosure are kept in proper working condition and not cause a violation the Environmental Protection Act or regulations promulgated therein.
- c. The scrubber and turbo-tunnel enclosure shall be in operation at all times when the associated emission units are in operation and emitting air contaminants.
- d. The scrubber shall be equipped with a monitoring device that continuously indicates and records the make-up water flow and pressure drop across the scrubber. The Permittee shall calibrate, maintain, and operate the scrubber monitoring device according to the manufacturer's specifications.

11a. This permit is issued based on negligible emissions of hydrogen chloride (HCl) from the steel coil pickling line and three hydrochloric acid storage tanks. For this purpose, HCl emission shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year. These limits are based on the maximum production rate, the most recent stack test data and the following operational limits:

- i. Steel Coil Throughput: 120 tons/hr, 89,000 tons/mo, 1,050,000 tons/yr;
- ii. Hydrochloric Acid Usage: 2,510 lbs/hr, 930 tons/mo, 11,000 tons/yr;
- iii. Maximum HCl concentration in pickling tanks: 16%;
- iv. Maximum pickling tanks temperature: 190°F;
- v. Scrubber make-up water flow no less than 1.88 gal/min; and
- vi. Pressure drop across the scrubber no more than 9.15" w.c.

b. The VOM usage and VOM emission from the oil coater shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>Tons/Month</u>	<u>Tons/Year</u>	<u>Tons/Month</u>	<u>Tons/Year</u>
1.27	12.70	1.27	12.70

These limits are based on the maximum material usage, the maximum VOM and HAP content of the materials, and the maximum emissions determined by a material balance. The VOM and HAP emissions shall be determined from the following equation:

$$E = \sum (V_i \times C_i)$$

Where:

E = VOM or HAP emissions (ton);

V_i = individual coating usage (ton); and

C_i = VOM or HAP content of the each individual coating (wt. fraction).

c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.31 tons/month and 13.14 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements to obtain a CAAPP permit from the Illinois EPA, the NESHAP for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants, 40 CFR 63 Subpart

CCC, and the NESHAP for Surface Coating of Metal Coil, 40 CFR Part 63, Subpart SSSS.

- d. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 12a. Pursuant to 40 CFR 60.8(a), at such other times as may be required by the Illinois EPA or USEPA under section 114 of the Clean Air Act, the owner or operator of such facility shall conduct performance test(s) and furnish the Illinois EPA or USEPA a written report of the results of such performance test(s).
- b. Pursuant to 40 CFR 60.8(b), performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in each applicable subpart of 40 CFR Part 60 unless the Illinois EPA or USEPA:
 - i. Specifies or approves, in specific cases, the use of a reference method with minor changes in methodology;
 - ii. Approves the use of an equivalent method;
 - iii. Approves the use of an alternative method the results of which he has determined to be adequate for indicating whether a specific source is in compliance;
 - iv. Waives the requirement for performance tests because the owner or operator of a source has demonstrated by other means to the Illinois EPA's or USEPA's satisfaction that the affected facility is in compliance with the standard; or
 - v. Approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors. Nothing in this paragraph shall be construed to abrogate the Illinois EPA's or USEPA's authority to require testing under section 114 of the Clean Air Act.
 - c. Pursuant to 40 CFR 60.8(c), performance tests shall be conducted under such conditions as the Illinois EPA or USEPA shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Illinois EPA or USEPA such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.

- d. Pursuant to 40 CFR 60.8(e), the owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:
 - i. Sampling ports adequate for test methods applicable to such facility. This includes:
 - A. Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test 1 methods and procedures; and
 - B. Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.
 - ii. Safe sampling platform(s).
 - iii. Safe access to sampling platform(s).
 - iv. Utilities for sampling and testing equipment.
- 13a. Pursuant to 40 CFR 60.463(b), the owner or operator of an affected facility shall conduct an initial performance test as required under 40 CFR 60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in 40 CFR 60.463.
- b. Pursuant to 40 CFR 60.463(c)(1), the owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/ l of coating solids applied. An owner or operator shall use the following procedures for each affected facility that does not use a capture system and control device to comply with the emission limit specified under 40 CFR 60.462(a)(1). The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Illinois EPA or USEPA may require the owner or operator who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Illinois EPA or USEPA.
 - i. Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month for each affected facility, except as provided

under 40 CFR 60.463(c) (1) (iv). The weighted average of the total mass of VOC's used per unit volume of coating solids applied each calendar month is determined by the following procedures.

- A. Calculate the mass of VOC's used ($M_o + M_d$) during each calendar month for each affected facility by using Equation 1 in 40 CFR 60.463(c) (1) (i) (A).

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj} \quad \text{Equation 1}$$

($SL_{dj} D_{dj}$ will be 0 if no VOC solvent is added to the coatings, as received)

Where:

n is the number of different coatings used during the calendar month, and

m is the number of different VOC solvents added to coatings used during the calendar month.

- B. Calculate the total volume of coating solids used (L_s) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^n V_{si} I_{ci} \quad \text{Equation 2}$$

Where:

n is the number of different coatings used during the calendar month.

- C. Calculate the volume-weighted average mass of VOC's used per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s} \quad \text{Equation 3}$$

- ii. Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during the calendar month for each affected facility by the following equation:

$$N = G \quad \text{Equation 4}$$

- iii. Where the volume-weighted average mass of VOC's discharged to the atmosphere per unit volume of coating solids applied (N) is equal

to or less than 0.28 kg/ l, the affected facility is in compliance.

- iv. If each individual coating used by an affected facility has a VOC content, as received, that is equal to or less than 0.28 kg/ l of coating solids, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.
- 14a. Pursuant to 40 CFR 60.466(a)(1), the reference methods in appendix A to 40 CFR Part 60, except as provided under 40 CFR 60.8(b), shall be used to determine compliance with 40 CFR 60.462 as follows: Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24;
- b. Pursuant to 40 CFR 60.466(b), for Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.
- 15a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The 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. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. 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.
 - ii. 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.

- b. Testing required by Conditions 16 and 17 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 16. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
 - 17. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
 - 18. Pursuant to 40 CFR 60.464(a), where compliance with the numerical limit specified in 40 CFR 60.462(a)(1) or (2) is achieved through the use of low VOC-content coatings without the use of emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, the owner or operator shall compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in 40 CFR 60.463.
 - 19a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
 - b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
 - 20. Pursuant to 40 CFR 60.465(e), each owner or operator subject to the provisions of 40 CFR 60 Subpart TT shall maintain at the source, for a period of at least 2 years, records of all data and calculations used

to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed.

21. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- 22a. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- b. Pursuant to 35 Ill. Adm. Code 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm. Code 212.316 shall maintain written records of the application of control measures as may be needed for compliance with the opacity limitations of 35 Ill. Adm. Code. 212.316.

- c. Pursuant to 35 Ill. Adm. Code 212.316(g) (2), the records required under 35 Ill. Adm. Code 212.316 shall include at least the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner and/or operator of the source;
 - iii. A map or diagram showing the location of all emission units controlled including the location, identification, length, and width of roadways;
 - iv. For each application of water or chemical solution to roadways by truck: the name and location of the roadway controlled, application rate of each truck, frequency of each application, width of each application, identification of each truck used, total quantity of water or chemical used for each application and, for each application of chemical solution, the concentration and identity of the chemical;
 - v. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent and, if diluted, percent of concentration, used each day; and
 - vi. A log recording incidents when control measures were not used and a statement of explanation.
- d. Pursuant to 35 Ill. Adm. Code 212.316(g) (3), copies of all records required by 35 Ill. Adm. Code 212.316 shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA and shall be transmitted to the Illinois EPA by a company-designated person with authority to release such records.
- e. Pursuant to 35 Ill. Adm. Code 212.316(g) (4), the records required under 35 Ill. Adm. Code 212.316 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours..
- f. Pursuant to 35 Ill. Adm. Code 212.324(g) (1), written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with 35 Ill. Adm. Code 212.324(f).
- g. Pursuant to 35 Ill. Adm. Code 212.324(g) (2), the owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emission limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what and corrective actions taken and what repairs were made.

- h. Pursuant to 35 Ill. Adm. Code 212.324(g) (3), a written record of the inventory of all spare parts not readily available from local suppliers shall be kept an updated.
 - i. Pursuant to 35 Ill. Adm. Code 212.324(g) (5), the records required under 35 Ill. Adm. Code 212.324 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
- 23a. Pursuant to 35 Ill. Adm. Code 218.187(e) (1) (B), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a) (1) shall on and after January 1, 2012, collect and record the following information each month for each cleaning operation, other than cleaning operations identified in 35 Ill. Adm. Code 218.187 (a) (2):
- i. The name and identification of each VOM-containing cleaning solution as applied in each cleaning operation;
 - ii. The VOM content of each cleaning solution as applied in each cleaning operation;
 - iii. The weight of VOM per volume and the volume of each as-used cleaning solution; and
 - iv. The total monthly VOM emissions from cleaning operations at the source;
- b. Pursuant to 35 Ill. Adm. Code 218.187(e) (10), all records required by this 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.
- c. Pursuant to 35 Ill. Adm. Code 218.211(c) (2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a) (1) (B), (a) (1) (C), (a) (2) (B), (a) (2) (C), or (a) (2) (D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:
- i. The name and identification number of each coating as applied on each coating line;
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.

- 24a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records addressing use of good operating practices for the scrubber and turbo-tunnel enclosure:
 - A. Records for periodic inspection of the scrubber and turbo-tunnel enclosure with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. Daily HCl concentration in pickling tanks (wt.%);
 - iii. Daily pickling tank temperature (°F);
 - iv. Daily scrubber make-up water flow (gal/min);
 - v. Daily pressure drop across the scrubber (in of w.c.);
 - vi. Steel process rate (tons/mo, tons/yr);
 - vii. Hydrochloric acid usage (gal/mo, gal/yr);
 - viii. Coating and cleanup solvent usage (tons/month and tons/year);
 - ix. The VOM and HAP content of each coating and cleanup solvent (% by weight);
 - x. Monthly and annual emissions of PM, VOM and HAP from the source with supporting calculations (tons/month, tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA or USEPA request for records during the course of a source inspection.
25. Pursuant to 40 CFR 60.465(c), following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Illinois EPA or USEPA every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40 CFR 60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Illinois EPA or USEPA semiannually.

- 26a. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- b. Pursuant to 35 Ill. Adm. Code 212.316(g) (1), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm. Code 212.316 shall submit to the Illinois EPA an annual report containing a summary of the application of control measures as may be needed for compliance with the opacity limitations of 35 Ill. Adm. Code. 212.316.
- c. Pursuant to 35 Ill. Adm. Code 212.316(g) (5), a quarterly report shall be submitted to the Illinois EPA stating the following: the dates any necessary control measures were not implemented, a listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of this Section. This report shall be submitted to the Illinois EPA 30 calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.
- d. Pursuant to 35 Ill. Adm. Code 212.324(g) (4), copies of all records required by 35 Ill. Adm. Code 212.324 shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.
- 27a. Pursuant to 35 Ill. Adm. Code 218.187(e) (1) (C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a) (1) shall comply with the following: Notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a) (2), ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.
- b. Pursuant to 35 Ill. Adm. Code 218.211(c) (3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a) (1) (B), (a) (1) (C), (a) (2) (B), (a) (2) (C), or (a) (2) (D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following:
- i. By a date consistent with 35 Ill. Adm. Code 218.106, or upon initial start-up of a new coating line, or upon changing the method of compliance from an existing subject coating line from

35 Ill. Adm. Code 218.205, 35 Ill. Adm. Code 218.207, 35 Ill. Adm. Code 218.215, or 35 Ill. Adm. Code 218.216 to 35 Ill. Adm. Code 218.204; the owner or operator of a subject coating line shall certify to the Illinois EPA that the coating line will be in compliance with 35 Ill. Adm. Code 218.204 on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date. The certification shall include:

- A. The name and identification number of each coating as applied on each coating line;
 - B. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
- ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
- A. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - B. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) or (e), as applicable.
- 28a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:

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

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

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this permit, please contact Valeriy Brodsky at 217/785-1705.

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:VJB:

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the steel coil pickling plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emission is below the level (e.g., 10 tons/year for any single HAP and 25 tons/year for any combination of such HAP), at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is used and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)			
	<u>PM</u>	<u>VOM</u>	Single <u>HAP</u>	Combined <u>HAPs</u>
Steel Coil Pickling Line and Three Hydrochloric Acid Storage Tanks	0.44		0.44	<u>0.44</u>
Coil Coating	<u>--</u>	<u>12.70</u>	<u>--</u>	<u>12.70</u>
Totals	0.44	<u>12.70</u>	7.90	<u>13.14</u>

VJB: