

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
NACME Steel Processing, LLC for
The Federally Enforceable State Operating Permit (FESOP) for
429 West 127th Street, Chicago

Site Identification No.: 031600FWL
Application No.: 05100052

Schedule

Public Comment Period Begins: February 22, 2013

Public Comment Period Closes: March 24, 2013

Illinois EPA Contacts

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I. INTRODUCTION

NACME Steel Processing, LLC has voluntarily applied for an operating permit for its steel pickling facility in order to incorporate federally enforceable limits. These limits would prevent the facility from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the revised permit that it would propose to issue for the plant. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

II. SOURCE DESCRIPTION

The NACME Steel operates steel coils pickling line comprised of four hydrochloric acid pickling tanks. After pickling coils are washed, dried and coated with rust preventive oil. The pickling tanks and coil washer as well as hydrochloric acid storage tank are enclosed in turbo-tunnel exhausted to a scrubber.

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source needs to operate this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-threshold of 10 tons per year for an individual HAP, hydrogen chloride.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The board has specific standards for emissions of particulate matter (PM) from process and fugitive sources, e.g., 35 IAC, Part 212, Subpart B – Visible Emissions, Subpart K – Fugitive Particulate Matter and Subpart L – PM Emissions from Process Emission Units. Emission units emitting VOM are regulated by Part 218, e.g., Subpart F – Coating Operations. The sources of VOM emissions are also subject to general VOM emission limitation found in Subpart G – Use of Organic Material.

The coil coating operations are subject to the New Source Performance Standards (NSPS) for Metal Coil Surface Coating, 40 CFR 60 Subpart TT.

The source is exempt from requirements of Emission Reduction Market System due to limitations of this FESOP.

The steel pickling operations potentially could be 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. The source is exempted from the requirements of this subpart due to the federally enforceable limitations of this permit on hydrogen chloride emission below applicability threshold level of Subpart CCC.

The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

The permit that the Illinois EPA is proposing to issue would identify the specific emission standards that apply to the emission units at the plant. The process emission units shall not exhibit emission of particulate matter exceeding 30% and fugitive emissions shall not cross property line as specified in Part 212, Subpart B and Subpart K. As explained, the plant operations are subject to 35 IAC 218, Subpart F and Subpart G which along with limitations of NSPS Subpart TT restrict VOM emission from subject emission units. The conditions of this permit are intended to ensure that the source complies with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 10 tons for an individual HAP and 25 tons for combined HAPs.

The permit conditions would also require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting

requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to issue the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.