217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

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

Application No.: 96030169 I.D. No.: 031111ABD
Applicant=s Designation: Date Received: March 8, 1996
Operation of: Steel Tubing, Pipes, and Struts Manufacturing
Date Issued: June 30, 2000 Expiration Date[2]: June 30, 2005
Source Location: 16100 South Lathrop Avenue, Harvey
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.

Revision Date Received: December 4, 2000
Revision Date Issued: May 24, 2001
Purpose of Revision: Minor Modification

This minor modification includes a revised amount of Allotment Trading Units (ATUs) to the source. This revision is solely due to converting a contingent allotment of ATUs into actual ATUs. There has been no change in ATUs to previously determined amounts. The contingent allotment was the result of a construction permit issued prior to January 1, 1999 but for which three years of emission data were not available at the time of initial issuance of the CAAPP permit in June, 2000. There are no future contingent allotments available.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued June 30, 2000 is incorporated herein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

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:jar

cc: Illinois EPA, FOS Region 1
USEPA

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

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

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

I.D. No.: 031111ABD
Standard Industrial Classification: 3317, Steel Pipe and Tubes

1.2 Owner/Parent Company

Tyco International, Ltd.
One Tyco Park
Exeter, New Hampshire 03833

1.3 Operator

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

Vijay B. Patel
708/339-1610

1.4 General 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.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATUs	Allotment Trading Units
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CE	control equipment
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
°F	degree Fahrenheit
ft	feet
ft^3	cubic feet
gal	gallon
HAP	Hazardous Air Pollutant
HCl	Hydrochloric Acid
HEAF	high efficiency air filter
hr	hour
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IAC	Illinois Administrative Code
ID	interior diameter
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kg	kilogram
lb	pound
m	meter
MACT	Maximum Available Control Technology
MEK	Methyl Ethyl Ketone
mft^3	million cubic feet
Mg	Megagram
mmBtu	million British thermal unit
mmHg	millimeters of Mercury
mo	month
MW	molecular weight
NESHAP	National Environmental Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
OD	outer diameter
PM	Particulate Matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds square inch atmospheric
RMP	Risk Management Plan
scf	standard cubic feet
SO_2	Sulfur Dioxide

SOCMI	Synthetic Organic Chemical Manufacturing Industry
T	ton
T1	Title I - identifies Title I conditions that have been carried over from an existing construction permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
USEPA	United States Environmental Protection Agency
VOL	volatile organic liquid
VOM	Volatile Organic Material
wt	weight
wt. %	weight percentage
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

8,850 gallon hydrochloric acid aboveground storage tank. Four natural gas-fired air make-up units at 7.5 mmBtu/hr each.

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:

N/A

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; (BO) Units with a rate heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

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

3.2 Compliance with Applicable Requirements

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

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate

matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Year 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-4), 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-4)
09	Pickling Line	1996	Wet Scrubber
10	Paint Mixing Room	1976	Baghouse (CE-8)
11	Boiler # 1	1996	None
12	Boiler # 2	1996	None
13	MEK Storage tank	1996	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 Applicable Regulations

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

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

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

b. Emissions of smoke or other particulate matter from any emission unit shall not exceed 30% opacity, except that opacity of greater than 30% but less than 60% shall be allowed for periods aggregating 8 minutes in any 60 minute period provided that such more 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 such emission unit owned and operated by the Permittee and provided further that such more opaque emissions permitted from each such unit shall be limited to 3 times per 24 hour period pursuant to 35 IAC 212.123(a) and (b).

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

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [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 Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

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

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

5.2.6 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

5.4.1 The Permittee is allowed to operate the steel tubes, pipes, and struts manufacturing plant at the maximum potential capacity of the units, so no operational or production limits are established for this source, provided that coating and cleanup solvent usage do not exceed maximum usage rates specified in Section 7.

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. These limitations reflect the information provided in the CAAPP Application, AFee Determination for CAAPP Permit,@ Form 292-CAAPP. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	401.69
Sulfur Dioxide (SO_2)	0.07
Particulate Matter (PM)	60.18
Nitrogen Oxides (NO_x)	15.07
HAP, not included in VOM or Particulate Matter	------
Other (HCl)	2.20
TOTAL	479.21

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the Clean Air Act being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a major source for HAPs.

5.5.3 Other source-wide emission limitations are set for this source in Section 7 pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA.

5.6 General Recordkeeping Requirements

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

Total annual emissions of the source, including HAP emissions, determined as the total of the emission data required to be kept by Section 7 of this permit.

5.6.1 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 Record keeping 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 as soon as is reasonable practicable during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the requirements of this permit as follows, pursuant to Section 39.5(7)(f)(ii) of the Act:

Annual emissions from the source in excess of the limits specified in Condition 5.5.1, within 30 days of such an occurrence.

5.7.2 Annual Emission Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Allowable Emissions

a. Compliance with Condition 5.2.2 is assured by the inherent nature of operations at the source, as demonstrated by historical operation.

b. Compliance with Condition 5.5.1 shall be determined by combining the emission records required to be kept by Condition 7 of this permit.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a Acap 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 further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold Aallotment 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 Abaseline emissions@ lowered to provide the emission reduction from stationary sources required for 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 account to cover its actual VOM emissions during the preceding season. An 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 account database. The Illinois EPA will then retire ATUs in sources= accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its 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 emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 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 (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

Note: This narrative description of the ERMS, as well as those in Section 7, are provided for informational purposes and are not intended to be enforceable as a practical matter. Refer to the ERMS, 35 IAC Part 205, and the provisions which follow for enforceable requirements of the ERMS.

6.2 Applicability

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

6.3 Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than 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 Aemissions excursion compensation,@ as described in Condition 6.4.

i. VOM emissions from insignificant 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 elsewhere in 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 Section 6.7(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 preceding seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

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 each of its Transaction Account, pursuant to 35 IAC 205.620(a).

d. Any transfer of ATUs to or from the source to or 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.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, 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 notice, as follows:

i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or

ii. For the second consecutive seasonal allotment period in which an emissions excursion occurs, 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 apply to the Illinois EPA to request that ATUs in an amount equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

a. The methods and procedures specified in Section 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 which are achieved during normal operating conditions 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 condition report within two days of the time when such excess emissions occurred due to the emergency; and

ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission 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 adjusted VOM emissions amount (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 are

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.

6.8 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.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with Maximum Achievable Control Technology (MACT) or using Best Available Technology (BAT), as identified in Section 7 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 6.3(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. 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 emission 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.

6.9 Recordkeeping for ERMS

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

a. Seasonal component of the Annual Emission Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [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 their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

None

b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in 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 their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01-09: 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 Aspool@ 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/or 6% hydrochloric acid (called pickling) 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 with the exception of

short production runs on Mill 6 that apply a high solids ultraviolet coating.

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 Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	Mill # 1	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-1)
02	Mill # 2	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-2)
03	Mill # 3	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-1)
04	Mill # 4	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-1)
05	Mill # 5	Baghouse (CE-7), Scrubber (CE-5), and HEAF Filter (CE-1)
06	Mill # 6	Baghouse (CE-4), Scrubber (CE-6), and HEAF Filter (CE-2)
07	Mill # 7	Baghouse (CE-4), Scrubber (CE-6), and HEAF Filter (CE-3)
08	Mill # 8	Baghouse (CE-4)
09	Pickling Line	Wet Scrubber

7.1.3 Applicable Regulations

a. An Aaffected mill@ for the purpose of these unit specific conditions is any of mills 1 to 8. The mill operations may include galvanizing, cleaning, metaling and acid treatment but specifically include coating of the tubes. As of the Adate issued@ as shown on page 1 of this permit, the affected coating lines are identified in Condition 7.1.2.

b. Mills 1 to 8 at the source are subject to 35 IAC 212 Subpart L:

i. For Mills 7 and 8, 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, 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)].

To calculate allowable for Mills 7 and 8, use the following equation:

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

Where:

P = Process Weight Rate

E = Allowable Emission Rate

For process weight rates up to 408 MG/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

[35 IAC 212.321]

ii. For Mills 1 to 6, 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)]

To calculate allowable for Mills 1 to 6, use the following equation:

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

Where:

P = Process Weight Rate

E = Allowable Emission Rate

For process weight rates up to 27.2 MG/hr (30 T/hr):

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

[35 IAC 212.322]

c. Each affected mill at the source is subject to 35 Ill. 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:

Description	kg/liter	lbs/gallon
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 Aless water@ part of the coating composites.

d. The Aaffected 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; and

iii. The compliance date for this line is June 22, 2001. The Permittee may wait to determine which of the compliance standards above has been chosen after the emission testing required by Condition 7.1.7.

7.1.4 Non-Applicable Regulations 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 this 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)

7.1.5 Operational and Work Practices

a. The wet scrubber on the 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 vessels which become effective June 22, 2001: 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. Effective June 22, 2001, the Permittee shall comply with the operation and maintenance requirements of 40 CFR 63.6(e) including development and implementation of the startup, shutdown, and malfunction plan

required by Section 63.6(e)(3). [40 CFR 63.1160(b)(1) and (2)]

d. Other maintenance requirements of 40 CFR 63.1160(b) which become effective June 22, 2001:

i. Require the manufacturer=s recommended maintenance 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. Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling;

iii. Require 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. Effective June 22, 2001, the Permittee shall monitor the pressure drop across the 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. From the date of issuance of this permit until June 22, 2001, 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 Emission Limitations

In addition to Condition 5.2.2 and the source-wide limitations in Condition 5.5, the affected mill line is subject to the following limits as established in construction permit # 95030157 and operating permit # 72100253.

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

VOM Usage (Tons/Mo)	VOM Usage (Tons/Yr)	VOM Emissions (Tons/Mo)	VOM Emissions (Tons/Yr)
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.

b. i. Emissions and VOM usage from Mill 8 shall not exceed the following limits [T1]:

VOM Usage (Tons/Mo)	VOM Usage (Tons/Yr)	VOM Emissions (Tons/Mo)	VOM Emissions (Tons/Yr)
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 (T/Mo)	Coating and Cleanup Solvent VOM Usage (T/Yr)	Coating and Cleanup Solvent VOM Emissions (T/Mo)	Coating and Cleanup Solvent VOM Emissions (T/Yr)
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.

d. i. Emissions and operation of hydrochloric acid push-pull pickling line shall not exceed the following limits as established in construction permit 96110019 [T1].

HCl Liquid Usage (Ton/Mo)	HCl Liquid Usage (Ton/Yr)	HCl Emissions (Ton/Mo)	HCl Emissions (Ton/Yr)
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.

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. Upon request by the Illinois EPA, 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 Aas 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. Within 180 days of the compliance date of June 22, 2001, for the pickling line, the HCl emissions from the line shall be tested (i.e., by December 19, 2001). As stated in Condition 7.1.3(d), the Permittee may decide if its compliance method will be final concentration or control efficiency after the emissions test, provided that inlet HCl mass rate is measured so that a control efficiency may be determined.

d. The specific test methods and other details of establishing 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)]

e. 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 2 1/2 years [40 CFR 63.1162(a)(i)]. As of the date of issuance of this permit, an alternative schedule has not been approved. 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.

f. Submittal of the test results shall include all 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:

Control Device	Pressure Drop Range in Inches of Water
CE-1 (HEAF)	- 3.5 to - 1.9 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.
CE-5 and CE-6 (Scrubber)	! Set point pressure across the packing, change scrubbant periodically, O & M parameters as per vendors= recommendation. ! Press drop range of 0.25 to 3.0 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 recording is not required.

b. Monitoring requirements for the pickling line are listed in Condition 7.1.5(e) and (f) with other NESHAP requirements.

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items to demonstrate compliance with Conditions of this section, 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).

   ii. Record of one weekly reading of pressure drop monitoring data of baghouses (CE-4 and CE-7).

   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 pickling line:

   i. General records as required by 40 CFR 63.10(b)(2) of Subpart A effective June 22, 2001. [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 ususal 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) effective June 22, 2001.

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;

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)]

iii. The following records for the water scrubber until June 22, 2001 at which time the preceding records (i and ii) supersede this requirement.

A. A copy of manufacturer or vendor recommendations on water scrubber maintenance and operating requirements.

B. Record that maintenance and operating requirements in A above were met.

g. Usage of hydrochloric acid (tons/month and tons/year) and HCl emissions (tons/month and tons/year).

7.1.10 Reporting Requirements

a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations from the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

i. The Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.1.3(d) 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)]

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 mill 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, thinners, or cleaning solvents 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 remains in compliance with the requirements of this permit.

7.1.12 Compliance Procedures

a. Compliance of each coating operation with the VOM emission limitations shall be determined from the testing required by this section. VOM emissions shall be calculated using the following equation:

VOM Emissions (ton/mo) = Coating Usage (gal/mo)* VOM Content (lb/gal).

The Permittee may use the VOM content (minus water and any compounds which are specifically exempted from the definition of VOM) from MSDS, if applicable. If the Permittee is preparing any batch of coating material to be applied, VOM content shall be determined from the internal laboratory analysis of a representative sample and the records shall be kept indicating detailed procedure of the test performed, including the quality control data.

b. Recordkeeping, monitoring, testing requirements of this section shall be used to determine compliance with the particulate matter emissions.

7.2 Unit 10 - Paint Mixing Room

7.2.1 Description

Allied stores 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.

This paint mixing room was constructed prior to 1980 in Cook county which is a severe ozone non attainment area.

7.2.2 List of Emission Units and Pollution Control Equipment

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

7.2.3 Applicable Regulations

a. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere form any emission unit, except as provided in 35 IAC 218.302, 218.303, and 218.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 218.301 shall apply to photochemically reactive material [35 IAC 218.301].

b. Each affected paint mixing room at the source is subject to 35 IAC 212.321(a), which requires that:

   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, 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)].

c. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected mixing room shall not exceed the allowable emission rates specified in the following equation [35 IAC 212.321]:

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

Where:

P = Process Weight Rate.

E = Allowable Emission Rate.

i. For process weight rates up to 408 MG/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

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. An affected mixing room is not subject to 35 IAC 218 Subpart AA because this operation is not engaged in manufacturing paint.

7.2.5 Operational and Production Limits and Work Practices

None

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source-wide emission limitations in Condition 5.5, the mixing room operation is subject to the following:

None

7.2.7 Testing Requirements

a. 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 is not required.

7.2.9 Recordkeeping Requirements

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

i. Record of one weekly reading of pressure drop monitoring data of baghouse (CE-8).

ii. Record of maximum process weight rate (lb/hr).

7.2.10 Reporting Requirements

a. Annual Emissions Report

i. Annual emissions report required pursuant to Condition 9.7 shall contain emissions information for previous year.

b. Report of Deviation

Report of any deviation from the applicable permit requirements of Condition 5.2.2 shall be reported to the Illinois EPA within 30 days of such occurrence. The report shall include the identity of the requirements for which a deviation occurred, a description of the deviation, its probable cause, and any corrective actions or preventive measures taken [39.5(7)(f)(ii) of the Act].

c. At least 30 calendar days before changing the method of compliance for an affected mixing room operation, the applicable emission estimation method as indicated in this permit , the Permittee shall certify to the Illinois EPA that the mixing room operation will be in compliance with the applicable limitation of and with the requirements of the compliance certification reports of Condition 9.8.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

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

None

7.2.12 Compliance Procedures

a. Record keeping, monitoring, testing and reporting requirements of this section shall be used to determine compliance with the particulate matter emissions.

b. VOM emissions are not calculated for this equipment because they are accounted for in Section 7.1.12 when the coatings are used.

7.3 Unit 11 - 12 Boiler 1 and 2

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. Boilers 1 and 2 were constructed in November, 1996.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Rated Heat Input
11	Boiler 1	10.04 mmBtu/hr
12	Boiler 2	10.04 mmBtu/hr

7.3.3 Applicable Regulations

a. 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.

b. 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.

7.3.4 Non-Applicability of Regulations of Concern

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.

7.3.5 Operational and Production Limits and Work Practices

Emission units 11 and 12 shall only be operated with natural gas as the fuel.

7.3.6 Emission Limitations [T1R]

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, the emission units 11 and 12 are subject to the following limits as established in construction permit # 96110019. The values have been revised from the construction permit solely due to publication of new emission factors.

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

Gas Consumption (mft^3/yr)
167.52

	Emissions (Tons/Year)
NO_x	8.8
CO	7.5
PM	0.7
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.

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for emission units 10-13 to demonstrate compliance with Condition 5.5.1 pursuant to Section 39.5(7)(b) of the Act:

a. Records of the gas consumption by emission units 11 and 12 in mft^3/yr.

b. VOM, PM, CO, and NO_x emissions from emission unit 11 and 12 in ton/yr.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations from the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Emissions of NO_x, PM, CO, SO_2, and VOM from emission units 11 and 12 in excess of the limits of this permit specified

in Condition 5.5.1 based on a calendar year within 30 days of such an occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

Emissions from emission units 11 and 12 shall be calculated based on the following emission factors:

Pollutant	Emission Factor ($lb/10^6\ ft^3$)
CO	84
NO_x	100
PM	7.6
SO_2	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion (10.0- 100.0 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42 Fifth Edition, March, 1998. VOM emission factor based on TOC factor corrected for 52% methane contribution.

Boiler Emissions (ton) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor Divided by 2000

7.4 Unit 13: MEK Storage Tank

7.4.1 Description

Emission unit 13 is used to store MEK to be used in the mills. Emission unit 13 was constructed in November, 1993. Vapor pressure of MEK is 1.35 psia at 70EF and capacity of this tank is 10,000 gallons.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
13	MEK Storage Tank	None

7.4.3 Applicable Regulations

None

7.4.4 Non-Applicability of Regulations of Concern

a. An Aaffected tank@ is not subject to the 35 IAC 218 Subpart B: Organic Emissions From Storage and loading Operations because vessels with a capacity less than or equal to 40,000 gallons storing a liquid with a maximum true pressure of less than 0.5 psia are exempt. The capacity of emission unit 13 is less than 40,000 gallon, therefore, it is not subject to 35 IAC 218 Subpart B [35 IAC 218.119(a)].

b. An Aaffected tank@ for the purpose of these unit-specific conditions, is a storage tank with a capacity less than or equal to 40 cubic meter (10,567 gallons) is not subject to 40 CFR 60 Subpart Kb: Standard of Performance for Volatile organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984.

c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 of this part and following exception: if no odor nuisance exists the limitation of this subpart shall apply only to photochemically reactive material. MEK is not photochemically reactive pursuant to the definition in 35 IAC 211.4690. [35 IAC 218.301].

7.4.5 Operational and Production Limits and Work Practices

None

7.4.6 Emission Limitations [T1R]

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, storage tank is subject to the following limits as established in construction permit 95030157 and operating permit 72100253. Due to the low annual limit, monthly limits have been deleted.

a. Emissions and operation of the MEK storage tank shall not exceed the following limits:

Throughput (gal/yr)	Vapor Pressure of Material Stored (mmHg)	VOM Emissions (T/yr)
60,955	70	0.44

These limits are based on maximum throughput, liquid stored and standard emission factors for storage tanks.

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Record keeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for storage tank to demonstrate compliance with Condition 5.5.1 pursuant to Section 39.5(7)(b) of the Act:

a. Records of annual throughput (gal/yr).

b. Records of vapor pressure (psia) at 70EF

c. MSDS of MEK stored in the storage tank;

d. Record of VOM emissions (ton/yr).

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Emissions of VOM from the storage tank in excess of the limits specified in Condition 7.4.6.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

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

a. Usage of any VOL without exceeding emissions and limitations of this permit.

7.4.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission shall be determined by using USEPA TANKS 3 program or any subsequent program submitted by the Permittee and accepted by the Illinois EPA.

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 July 11, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

i. Describe the physical or operational change;

ii. Identify the schedule for implementing the physical or operational change;

iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the

Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

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

8.6.2 Test Notifications

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

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion

of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

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

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

a. The provisions of Section 303 (emergency powers) of the Clean Air Act, 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 Clean Air Act; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

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 Clean Air Act and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(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

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants; 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.

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)(0)(iv) of the Act]

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken

to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or

limitations, or other terms or conditions of this permit; and

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 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: _____

DGP:jar