

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Magnesium Elektron North America  
Attn: Tom Murawski  
1001 College Street  
Madison, Illinois 62060

<u>Application No.:</u> 72090139	<u>I.D. No.:</u> 119105AAH
<u>Applicant's Designation:</u>	<u>Date Received:</u> January 9, 2008
<u>Subject:</u> Magnesium Casting Operations	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 1001 College Street, Madison, Madison County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

One (1) 16.8 mmBtu/hour Natural Gas-Fired Furnace - Casting Homogenizing Oven;  
Two (2) 1.5 mmBtu/hour Natural Gas-Fired Furnaces - Air Force Ovens, North and South;  
One (1) 29.4 mmBtu/hour Natural Gas-Fired Intermittent Casting Unit;  
One (1) 42.0 mmBtu/hour Natural Gas-Fired Billet Casting Unit;  
One (1) 42.0 mmBtu/hour Natural Gas-Fired Slab Casting Unit;  
One (1) 4.2 mmBtu/hour Natural Gas-Fired Furnace - CER Flux Cleaning Pot;  
Metal Chip Handling System Cyclone - Face Scalper;  
One (1) 11.3 mmBtu/hour Natural Gas-Fired Furnace - 11 Oven;  
Two (2) Wet Scrubbers - 6 Mill #1 & #2 Coil Wire Brush & #3 Sheet Wire Brush  
One (1) 3.0 mmBtu/hour Natural Gas-Fired Furnace - 22 Oven;  
One (1) 25.0 mmBtu/hour Natural Gas-Fired Furnace - 1B Oven;  
One (1) 4.0 mmBtu/hour Natural Gas-Fired Boiler - Building 1 Boiler;  
One (1) 4.0 mmBtu/hour Natural Gas-Fired Steam Generator - (1 Mill);  
Twelve (12) 1.0 mmBtu/hour Natural Gas-Fired Dravo Heaters;  
One (1) Clear Backcoater - Graphic Arts Paint Line;  
One (1) 2.0 mmBtu/hour Natural Gas-Fired Backcoater Furnace - Graphic Arts Paint Line;  
Seven (7) 1.81 mmBtu/hour Distillate Fuel Oil-Fired Dravo Heaters;  
One (1) 2.0 mmBtu/hr Natural Gas-Fired Furnace - Casting Alloy Floor Scrap Pre-Heat Oven;  
One (1) 20.0 mmBtu/hr Natural Gas-Fired Furnace - 2 Mill Coil Preheat Oven System;  
One (1) 1.6 mmBtu/hour Natural Gas-Fired Furnace - 23 Oven;  
One (1) 2.0 mmBtu/hour Natural Gas-Fired Furnace - 8 Mill Oven;  
Metal Chip Handling System Cyclone - Oliver Saw @ Customer Service Center;  
One (1) 1.6 mmBtu/hour Natural Gas-Fired Steam Generator - Graphic Arts;  
One (1) 4.3 mmBtu/hour Natural Gas-Fired Steam Generator - 1 Mill; and  
Roadways Controlled by Water Spray System

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
    - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Nitrogen Oxides (NO<sub>x</sub>) and Particulate Matter less than 10 microns (PM<sub>10</sub>), and Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP), 25 tons/year for any combination of such HAPs, and 100,000 tons of Carbon Dioxide equivalent (CO<sub>2</sub>e) per year for Green House Gases (GHG)). As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
    - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm.
    - iii. To establish federally enforceable production and operating limitations, which restrict the maximum theoretical emissions of VOM to less than 100 tons per calendar year in the absence of air pollution control equipment, so that the source is not subject to the requirements of 35 Ill. Adm. Code Part 219 Subpart TT (Other Emission Units).
  - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
  - c. This permit supersedes all operating permits issued for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
    - b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
    - c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including

any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

- d. Pursuant to 35 Ill. Adm. Code 212.316(c), no person shall cause or allow fugitive particulate matter emissions from any roadway or parking area to exceed an opacity of 10 percent, except that the opacity shall not exceed 5 percent at quarries with a capacity to produce more than 1 million T/yr of aggregate.
- e. Pursuant to 35 Ill. Adm. Code 212.316(f), unless an emission unit has been assigned a particulate matter, PM<sub>10</sub>, or fugitive particulate matter emissions limitation elsewhere in 35 Ill. Adm. Code 212.316 or in 35 Ill. Adm. Code Part 212 Subparts R or S, no person shall cause or allow fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent.
- f. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- g. Pursuant to 35 Ill. Adm. Code 212.324(b), except as otherwise provided in 35 Ill. Adm. Code 212.324, no person shall cause or allow the emission into the atmosphere, of PM<sub>10</sub>, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period.
- h. Pursuant to 35 Ill. Adm. Code 212.324(e), no person shall cause or allow emissions of PM-10 into the atmosphere to exceed 12.9 ng/J (0.03 lbs/mmBtu) of heat input from the burning of fuel other than natural gas at any process emission unit located in the vicinity of Granite City as defined in 35 Ill. Adm. Code 212.324(a)(1)(C).
- i. Pursuant to 35 Ill. Adm. Code 212.700(a), 35 Ill. Adm. Code 212 Subpart U (Additional Control Measures) shall apply to those sources in the areas designated in and subject to 35 Ill. Adm. Code 212.324(a)(1) or 212.423(a) and that have actual annual source-wide emissions of PM<sub>10</sub> of at least fifteen (15) tons per year.
- 3a. Pursuant to 35 Ill. Adm. Code 214.122(b)(2), no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hour of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu).
- b. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

c. Pursuant to 35 Ill. Adm. Code 214.304, the emissions from the burning of fuel at process emission sources located in the Chicago or St. Louis (Illinois) major metropolitan areas shall comply with applicable 35 Ill. Adm. Code 214 Subparts B through F (i.e., 35 Ill. Adm. Code 214.122(b)).

4a. Pursuant to 35 Ill. Adm. Code 219.204(j)(1), except as provided in 35 Ill. Adm. Code 219.205, 219.207, 219.208, 219.212, 219.215 and 219.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Miscellaneous Metal Parts and Products Coating. Except as otherwise provided in 35 Ill. Adm. Code 219.204(a), (c), (g), (h), (j), (l), (n), (o), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 219.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 219.211(c) except where noted. The emission limitations are as follows:

Prior to May 1, 2012: Miscellaneous Metal Parts and Products Coating	kg/l	lb/gal
Clear coating	0.52	(4.3)

b. Pursuant to 35 Ill. Adm. Code 219.204(q)(1), on and after May 1, 2012, the owner or operator of a miscellaneous metal or plastic parts coating line shall comply with the limitations in 35 Ill. Adm. Code 219.204(q). The limitations in 35 Ill. Adm. Code 219.204(q) shall not apply to aerosol coating products, powder coatings, or primer sealants and ejection cartridge sealants used in ammunition manufacturing. Primer sealants and ejection cartridge sealants shall instead be regulated under 35 Ill. Adm. Code 219 Subpart TT. For purposes of 35 Ill. Adm. Code 219.204(q)(1), "corrosion resistant basecoat" means a water-borne epoxy coating applied via an electrodeposition process to a metal surface prior to spray coating, for the purpose of enhancing corrosion resistance. Also for purposes of 35 Ill. Adm. Code 219.204(q)(1), "marine engine coating" means any extreme performance protective, decorative, or functional coating applied to an engine that is used to propel watercraft. The limitations in 35 Ill. Adm. Code 219.204(q)(1) shall not apply to stencil coats, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, magnetic data storage disk coatings, and plastic extruded onto metal parts to form a coating. The limitations in 35 Ill. Adm. Code 219.219, however, shall apply to these coatings unless specifically excluded in 35 Ill. Adm. Code 219.219.

		kg VOM/l coating solids applied	lb VOM/gal coating solids applied
i.	General one component coating		
	A. Air dried	0.34 (2.8)	0.54 (4.52)
	B. Baked	0.28 (2.3)	0.40 (3.35)
ii.	General multi-component coating		
	A. Air dried	0.34 (2.8)	0.54 (4.52)
	B. Baked	0.28 (2.3)	0.40 (3.35)
iii.	Extreme high-gloss coating		
	A. Air dried	0.42 (3.5)	0.80 (6.67)
	B. Baked	0.36 (3.0)	0.61 (5.06)
iv.	Extreme performance coating		
	A. Air dried	0.42 (3.5)	0.80 (6.67)
	B. Baked	0.36 (3.0)	0.61 (5.06)
v.	Heat-resistant coating		
	A. Air dried	0.42 (3.5)	0.80 (6.67)
	B. Baked	0.36 (3.0)	0.61 (5.06)
vi.	High temperature coating		
		0.42 (3.5)	0.80 (6.67)
vii.	Pretreatment coating		
		0.42 (3.5)	0.80 (6.67)
		kg VOM/l coating solids applied	lb VOM/gal coating solids applied
viii.	Repair coats and touch-up coatings		
	A. Air dried	0.42 (3.5)	

	B. Baked	0.36 (3.01)	
ix.	All other coatings		
	A. Air dried	0.40 (3.3)	0.73 (5.98)
	B. Baked: primer/topcoat	0.34 (2.8)	0.54 (4.52)
c.	Pursuant to 35 Ill. Adm. Code 219.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 219.302, 219.303, 219.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 219 Subpart G shall apply only to photochemically reactive material.		
5a.	This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs.		
b.	This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Primary Magnesium Refining, 40 CFR 63 Subpart TTTTT, because this source is not a primary magnesium refinery.		
c.	This permit is issued based on the furnace melting operation at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Nonferrous Metals Processing Area Sources, 40 CFR 63 Subpart TTTTTT, because the furnace melting operations does not melt post-consumer nonferrous metal scrap to make products including bars, ingots, blocks, or metal powders as defined in 40 CFR 63.11472.		
d.	This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Nonferrous Metals Processing Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries, 40 CFR 63 Subpart ZZZZZZ, because this source does not use material containing other nonferrous foundry HAP, as defined in 40 CFR 63.11556.		
e.	This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESAHP) for Paint Stripping And Miscellaneous Surface Coating at Area Sources, 40 CFR Part 63 Subpart HHHHHH because the Clear Backcoater will not be used to perform spray application of coatings that contain the target		

HAP, as defined in 40 CFR 63.11180, to a plastic and/or metal substrate on a part or product

- 6a. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
  - b. Pursuant to 35 Ill. Adm. Code 212.324(d), the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, 35 Ill. Adm. Code 212.324(d) is not a defense finding of a violation of the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c).
- 7a. Pursuant to 35 Ill. Adm. Code 219.187(a)(2)(B)(xii), notwithstanding 35 Ill. Adm. Code 219.187(a)(1) cleaning operations for emission units within the miscellaneous metal parts coating source category shall be exempt from the requirements of 35 Ill. Adm. Code 219.187(b), (c), (d), (f), and (g).
  - b. Pursuant to 35 Ill. Adm. Code 219.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 is required to meet the limitations of 35 Ill. Adm. Code 219 Subpart G (35 Ill. Adm. Code 219.301 or 219.302 )after the date by which the coating line is required to meet 35 Ill. Adm. Code 219.204.
  - c. This permit is issued based on the source not being subject to the requirements of 35 Ill. Adm. Code Part 219 Subpart TT (Other Emission Units). This is a result of the federally enforceable production and operating limitations established in this permit, which restrict the maximum theoretical emissions of VOM to less than 100 tons per calendar year in the absence of air pollution control equipment.
- 8a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
  - b. Pursuant to 35 Ill. Adm. Code 212.307, all unloading and transporting operations of materials collected by pollution control equipment shall

be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods.

- c. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- d. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- e. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- f. Pursuant to 35 Ill. Adm. Code 212.324(f), for any process emission unit subject to 35 Ill. Adm. Code 212.324(a), the owner or operator shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 Ill. Adm. Code 212.324 shall be met at all times. 35 Ill. Adm. Code 212.324 shall not affect the applicability of 35 Ill. Adm. Code 201.149. Proper maintenance shall include the following minimum requirements:

- i. Visual inspections of air pollution control equipment;
  - ii. Maintenance of an adequate inventory of spare parts; and
  - iii. Expeditious repairs, unless the emission unit is shutdown.
- g. Pursuant to 35 Ill. Adm. Code 212.701(a), those sources subject to 35 Ill. Adm. Code 212 Subpart U shall prepare contingency measure plans reflecting the PM<sub>10</sub> emission reductions set forth in 35 Ill. Adm. Code 212.703. These plans shall become federally enforceable permit conditions. Such plans shall be submitted to the Illinois EPA by November 15, 1994. Notwithstanding the foregoing, sources that become subject to the provisions of 35 Ill. Adm. Code 212 Subpart U after July 1, 1994, shall submit a contingency measure plan to the Illinois EPA for review and approval within ninety (90) days after the date such source or sources became subject to the provisions of 35 Ill. Adm. Code 212 Subpart U or by November 15, 1994, whichever is later. The Illinois EPA shall notify those sources requiring contingency measure plans, based on the Illinois EPA's current information; however, the Illinois EPA's failure to notify any source of its requirement to submit contingency measure plans shall not be a defense to a violation of 35 Ill. Adm. Code 212 Subpart U and shall not relieve the source of its obligation to timely submit a contingency measure plan.
- h. Pursuant to 35 Ill. Adm. Code 212.703(a), all sources subject to 35 Ill. Adm. Code 212 Subpart U shall submit a contingency measure plan. The contingency measure plan shall contain two levels of control measures:
- i. Level I measures are measures that will reduce total actual annual source-wide fugitive emissions of PM<sub>10</sub> subject to control under 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 by at least 15%.
  - ii. Level II measures are measures that will reduce total actual annual source-wide fugitive emissions of PM<sub>10</sub> subject to control under 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 by at least 25%.
- i. Pursuant to 35 Ill. Adm. Code 212.703(b), a source may comply with 35 Ill. Adm. Code 212 Subpart U through an alternative compliance plan that provides for reductions in emissions equal to the level of reduction of fugitive emissions as required at 35 Ill. Adm. Code 212.703(a) and which has been approved by the Illinois EPA and USEPA as federally enforceable permit conditions. If a source elects to include controls on process emission units, fuel combustion emission units, or other fugitive emissions of PM<sub>10</sub> not subject to 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 at the source in its alternative control plan, the plan must include a reasonable schedule for implementation of such controls, not to exceed two (2) years. This implementation schedule is subject to Illinois EPA review and approval.

- j. Pursuant to 35 Ill. Adm. Code 212.704(b), if there is a violation of the ambient air quality standard for PM<sub>10</sub> as determined in accordance with 40 CFR Part 50, Appendix K, the Illinois EPA shall notify the source or sources the Illinois EPA has identified as likely to be causing or contributing to one or more of the exceedences leading to such violation, and such source or sources shall implement Level I or Level II measures, as determined pursuant to 35 Ill. Adm. Code 212.704(e). The source or sources so identified shall implement such measures corresponding to fugitive emissions within ninety (90) days after receipt of a notification and shall implement such measures corresponding to any nonfugitive emissions according to the approved schedule set forth in such source's alternative control plan. Any source identified as causing or contributing to a violation of the ambient air quality standard for PM<sub>10</sub> may appeal any finding of culpability by the Illinois EPA to the Illinois Pollution Control Board pursuant to 35 Ill. Adm. Code 106 Subpart J.
- k. Pursuant to 35 Ill. Adm. Code 212.704(e), the Illinois EPA shall require that sources comply with the Level I or Level II measures of their contingency measure plans, pursuant 35 Ill. Adm. Code 212.704(b), as follows:
  - i. Level I measures shall be required when the design value of a violation of the 24-hour ambient air quality standard, as computed pursuant to 40 CFR 50, Appendix K, is less than or equal to 170 ug/m<sup>3</sup>.
  - ii. Level II measures shall be required when the design value of a violation of the 24-hour ambient air quality standard, as computed pursuant to 40 CFR 50, Appendix K, exceeds 170 ug/m<sup>3</sup>.
- 9a. Pursuant to 35 Ill. Adm. Code 219.219(b), except as provided in 35 Ill. Adm. Code 219.219(c), every owner or operator of a coating line described in 35 Ill. Adm. Code 219.204(q) shall:
  - i. Store all VOM-containing coatings, thinners, coating-related waste materials, cleaning materials, and used shop towels in closed containers;
  - ii. Ensure that mixing and storage containers used for VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing these materials;
  - iii. Minimize spills of VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials;
  - iv. Convey VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials from one location to another in closed containers or pipes;
  - v. Minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment

cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers; and

- vi. Apply all coatings using one or more of the following application methods:
  - A. Electrostatic spray;
  - B. High volume low pressure (HVLP) spray;
  - C. Flow coating. For the purposes of 35 Ill. Adm. Code 219.219(b)(6)(C), flow coating means a non-atomized technique of applying coating to a substrate with a fluid nozzle with no air supplied to the nozzle;
  - D. Roll coating;
  - E. Dip coating, including electrodeposition. For purposes of 35 Ill. Adm. Code 219.219(b)(6)(E), electrodeposition means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created;
  - F. Airless spray;
  - G. Air-assisted airless spray; or
  - H. Another coating application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLP spraying, if the method is approved in writing by the Illinois EPA.
- b. Pursuant to 35 Ill. Adm. Code 219.219(c)(2), notwithstanding 35 Ill. Adm. Code 219.219(b), the application method limitations in 35 Ill. Adm. Code 219.219(b)(6) shall not apply to for metal parts and products coating operations: touch-up coatings, repair coatings, textured finishes, stencil coatings, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, magnetic data storage disk coatings, and plastic extruded onto metal parts to form a coating;
- 10a. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
  - b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the cyclone and wet scrubbers such that the cyclone and wet scrubbers are kept in proper working condition and not causes a violation of the Illinois Environmental Protection Act or regulations promulgated therein.

- c. The Homogenizing Furnace, Forging Ovens, Intermittent Caster Pot Furnace, Billet Caster Pot Furnace, Slab Caster Pot Furnace, Flux Cleaning Pot Furnace, Heat Treat Furnace, Thermal Flatten Oven, Process Anneal Oven, Bldg 1 Boiler, Steam Generator, the 12 Natural Gas-Fired Dravo Heaters, Backcoater Oven, Scrap Pre-Heat Oven, Scrap Pre-Heat Oven, and the 2-Mill Pre-Heat Furnace shall only be operated with natural gas as the fuel. The use of any other fuel in the Homogenizing Furnace, Forging Ovens, Intermittent Caster Pot Furnace, Billet Caster Pot Furnace, Slab Caster Pot Furnace, Flux Cleaning Pot Furnace, Heat Treat Furnace, Thermal Flatten Oven, Process Anneal Oven, Bldg 1 Boiler, Steam Generator, the 12 Natural Gas-Fired Dravo Heaters, Backcoater Oven, Scrap Pre-Heat Oven, Scrap Pre-Heat Oven, or the 2-Mill Pre-Heat Furnace requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- d. The 7 Oil-Fired Dravo Heaters shall only be operated with distillate fuel oil as the fuel. The use of any other fuel in any of the 7 Oil-Fired Dravo Heaters requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- e. The Permittee shall not keep, store or use distillate fuel oil (Grades No. 1 and 2) at this source with a sulfur content greater than the larger of the following two values:
  - i. 0.28 weight percent, or
  - ii. The wt. percent given by the formula: Maximum wt. percent sulfur = (0.00015) x (Gross heating value of oil, Btu/lb).
- f. Organic liquid by-products or waste materials shall not be used in any emission unit at this source without written approval from the Illinois EPA.
- g. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
- 11a. Emissions and operation of the Magnesium Casting Operation shall not exceed the following limits:

<u>Equipment</u>	<u>Magnesium Casting Throughput</u>		<u>Pollutant</u>	<u>Emission Factor (lbs/Ton)</u>	<u>Emissions</u>	
	<u>(tons/mo)</u>	<u>(tons/yr)</u>			<u>(Tons/mo)</u>	<u>(Tons/yr)</u>
All Pot Furnaces	4200.00	42,000.00	PM	4.00	8.40	84.00
			VOM	2.40	5.04	50.40

These limits are based on the maximum magnesium throughput and standard emission factors (Table 12.12.-1, AP-42, Fifth Edition, Volume I, November 1994 and the Factor Information Retrieval (FIRE) Data System,

Version 6.25, September 2004). Note that there is a "nested" limit on the emissions of PM<sub>10</sub> as a result of the limit on PM emissions. Therefore, limiting PM also limits PM<sub>10</sub> emissions to an equal or lesser quantity.

- b. Emissions and operation of the Metal Chip Handling Operation shall not exceed the following limits:

<u>Operation</u>	<u>Material Usage</u>		<u>Emission</u>	<u>Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>Factor</u>	<u>PM</u>	<u>PM</u>
			<u>(lbs/ton)</u>	<u>(Tons/mo)</u>	<u>(Tons/yr)</u>
Metal Chip Handling System	438	4,380	1.84	0.40	4.03

These limits are based on a material throughput of 0.5 ton/hr, maximum operating time of 8,760 hr/year, 95% control efficiency for the cyclone, and emission factor obtained from mass balance. Note that there is a "nested" limit on the emissions of PM<sub>10</sub> as a result of the limit on PM emissions. Therefore, limiting PM also limits PM<sub>10</sub> emissions to an equal or lesser quantity.

- c. Total combined operation and emissions from all natural gas combustion units shall not exceed the following limits:

- i. Natural Gas Usage: 100.8 mmscf/month, 1,008 mmscf/year.
- ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
	<u>(lbs/mmscf)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Carbon Dioxide Equivalent (CO <sub>2</sub> e)	120,246.7	6,060.43	60,604.34
Carbon Monoxide (CO)	84.0	4.23	42.34
Nitrogen Oxides (NO <sub>x</sub> )	100.0	5.04	50.40
Particulate Matter (PM)	7.6	0.38	3.83
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.03	0.30
Volatile Organic Material (VOM)	5.5	0.28	2.77

These limits are based on the maximum fuel usage for all units combined and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998). Note that there is a "nested" limit on the emissions of PM<sub>10</sub> as a result of the limit on PM emissions. Therefore, limiting PM also limits PM<sub>10</sub> emissions to an equal or lesser quantity.

- d. Total combined operation and emissions from all fuel oil combustion units shall not exceed the following limits:

- i. Fuel Oil Usage: 96,000 gallons/month, 960,000 gallons/year.
- ii. Emissions from the combustion of fuel oil:

Pollutant	Emission Factor	Emissions	
	(lbs/10 <sup>3</sup> Gal)	(Tons/Mo)	(Tons/Yr)
Carbon Dioxide Equivalent (CO <sub>2</sub> e)	22,385.15	1,074.49	10,744.87
Carbon Monoxide (CO)	5.00	0.24	2.40
Nitrogen Oxides (NO <sub>x</sub> )	20.00	0.96	9.60
Particulate Matter (PM)	2.00	0.10	0.96
Sulfur Dioxide (SO <sub>2</sub> )	39.76	1.91	19.08
Volatile Organic Material (VOM)	0.24	0.02	0.16

These limits are based on the maximum fuel oil usage, standard emission factors (Tables 1.3-1 and 1.3-3, AP-42, Fifth Edition, Volume I, Supplement E, September 1998), and a sulfur content of 0.28% by weight. Note that there is a "nested" limit on the emissions of PM<sub>10</sub> as a result of the limit on PM emissions. Therefore, limiting PM also limits PM<sub>10</sub> emissions to an equal or lesser quantity.

- e. Total combined operation and fugitive PM emissions from all roadways shall not exceed 0.80 tons/month and 5.79 tons/yr. Note that limiting PM emissions also limits PM-10 emissions to an equal or lesser quantity. These limits are based on standard emission factors and 90% control efficiency of the water spray system.
- f. Emissions and operation of the backcoater shall not exceed the following limits:

Material	Material Usage		VOM	VOM Emissions	
	Gal/Month	Gal/yr	lb/Gal	Ton/Month	Tons/Year
Coating	1,752	17,520	4.23	3.71	37.05

These limits are based on clear coating usage of 2 gal/hr, maximum operating time of 8760 hr/year, and a clear coating VOM content of 4.23 lb/gal.

- g. This permit is issued based on negligible emissions of PM<sub>10</sub> from #1-2 coil wire brush cleaning and #3 sheet wire brush cleaning operation controlled by 2 wet scrubbers. For this purpose, emissions from each emission unit shall not exceed nominal rates of 0.1 lb/hr and 0.44 ton/yr.
- h. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA and the NESHAP for Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm.
- i. The VOM and HAP emissions from the backcoater, solvent usage, and lubricating oil usage shall be calculated using the following equation:

$$E = [\sum P_i \times d_i \times C_i] / 2,000$$

where:

E = VOM or HAP emissions (tons);

P<sub>i</sub> = Coating, solvent and lubricating oil usage (gallons);

d<sub>i</sub> = Density of coating, solvent and lubricating oil (lbs/gallon); and

C<sub>i</sub> = VOM or HAP content of raw material P<sub>i</sub> used (% by weight);

- j. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 12a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
  - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
  - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Conditions 13 and 14 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
13. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter

emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.

- 14a. Pursuant to 35 Ill. Adm. Code 219.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 219.105 to establish the records required under 35 Ill. Adm. Code 219.211.
15. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- 16a. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- b. Pursuant to 35 Ill. Adm. Code 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm. Code 212.316 shall maintain written records of the application of

control measures as may be needed for compliance with the opacity limitations of 35 Ill. Adm. Code. 212.316.

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

malfunction and shall state what and corrective actions taken and what repairs were made.

- h. Pursuant to 35 Ill. Adm. Code 212.324(g)(3), a written record of the inventory of all spare parts not readily available from local suppliers shall be kept an updated.
  - i. Pursuant to 35 Ill. Adm. Code 212.324(g)(5), the records required under 35 Ill. Adm. Code 212.324 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
- 17a. Pursuant to 35 Ill. Adm. Code 219.211(c), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 other than 35 Ill. Adm. Code 219.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 219.204 shall on and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:
- i. The name and identification number of each coating as applied on each coating line;
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
  - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 219.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line, and certified product data sheets for each coating.
- b. Pursuant to 35 Ill. Adm. Code 219.211(h)(3), on and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 219.219 shall maintain at the source all records required by this 35 Ill. Adm. Code 219.211(h) for a minimum of three years from the date the document was created and make those records available to the Illinois EPA upon request.
- 18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records addressing use of good operating practices for the cyclone and wet scrubbers:

- A. Records for periodic inspection of the cyclone and wet scrubbers with date, individual performing the inspection, and nature of inspection; and
  - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- ii. Magnesium casting throughput for all pot furnaces (tons/mo and ton/yr).
  - iii. Metal chip handling system throughput (tons/month and tons/year);
  - iv. Natural gas fuel usage (mmscf/month and mmscf/yr);
  - v. Fuel oil usage (gal/month and gal/yr);
  - vi. The sulfur content of the fuel oil used at the source (% by weight), this shall be recorded for each shipment of oil delivered to the source;
  - vii. Coating and clean-up solvent usage (gallons/month, gallons/year);
  - viii. Density of each coating and clean-up solvent (lbs/gallon);
  - ix. The VOM and HAP content of each coating and cleanup solvent (% by weight); and
  - x. Monthly and annual CO<sub>2</sub>e, CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM, and HAP emissions from the source with supporting calculations (tons/month, tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 19a. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- b. Pursuant to 35 Ill. Adm. Code 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm. Code 212.316 shall submit to the Illinois EPA an annual report containing a summary of the application of control measures as may be

needed for compliance with the opacity limitations of 35 Ill. Adm. Code. 212.316.

- c. Pursuant to 35 Ill. Adm. Code 212.316(g)(5), a quarterly report shall be submitted to the Illinois EPA stating the following: the dates any necessary control measures were not implemented, a listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of this Section. This report shall be submitted to the Illinois EPA 30 calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.
  - d. Pursuant to 35 Ill. Adm. Code 212.324(g)(4), copies of all records required by 35 Ill. Adm. Code 212.324 shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.
- 20a. Pursuant to 35 Ill. Adm. Code 219.211(c), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 other than 35 Ill. Adm. Code 219.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 219.204 shall comply with the following:
- i. By a date consistent with 35 Ill. Adm. Code 219.106, or upon initial start-up of a new coating line, or upon changing the method of compliance from an existing subject coating line from 35 Ill. Adm. Code 219.205, 35 Ill. Adm. Code 219.207, 35 Ill. Adm. Code 219.215, or 35 Ill. Adm. Code 219.216 to 35 Ill. Adm. Code 219.204; the owner or operator of a subject coating line shall certify to the Illinois EPA that the coating line will be in compliance with 35 Ill. Adm. Code 219.204 on and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date. The certification shall include:
    - A. The name and identification number of each coating as applied on each coating line;
    - B. The weight of VOM per volume of each coating (minus water and any compounds that are specifically exempted from the definition of VOM) as applied each day on each coating line;
    - C. For coating lines subject to the limitations of 35 Ill. Adm. Code 219.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line.

- ii. On and after a date consistent with 35 Ill. Adm. Code 219.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
  - A. Any record showing violation of 35 Ill. Adm. Code 219.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
  - B. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 219.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1), (e)(1), or (i)(1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 219.204 to 35 Ill. Adm. Code 219.205 or 35 Ill. Adm. Code 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 219.211(d), (e), or (i), as applicable.
- b. Pursuant to 35 Ill. Adm. Code 219.211(h), on and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 219.219 shall comply with the following:
  - i. By May 1, 2012, or upon initial start-up, whichever is later, submit a certification to the Illinois EPA that includes:
    - A. A description of the practices and procedures that the source will follow to ensure compliance with the applicable requirements in 35 Ill. Adm. Code 219.219;
    - B. For sources subject to 35 Ill. Adm. Code 219.219(b)(6), the application methods used to apply coatings on the subject coating line;
  - ii. Notify the Illinois EPA of any violation of 35 Ill. Adm. Code 219.219 by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation.
- c. Pursuant to 35 Ill. Adm. Code 219.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 219 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 219.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 21a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or

deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
1340 North Ninth Street  
P.O. Box 19276  
Springfield, Illinois 62794-9276

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

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

It should be noted that this permit is revised to remove the aluminum casting operation.

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

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

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

ECB:GB:jws

cc: Illinois EPA, FOS Region 3  
Lotus Notes

## Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the Magnesium Casting Facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons/year NO<sub>x</sub>, PM<sub>10</sub>, and VOM, 10 tons/year for any single HAP, 25 tons/year for any combination of such HAP, and 100,000 ton/year for CO<sub>2</sub>e) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)						<u>Single HAP</u>	<u>Combined HAPs</u>
	<u>CO<sub>2</sub>e</u>	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>		
Pot Furnaces				84.00			50.40	
Metal Chip Handling				4.03				
Natural Gas Combustion	60,604.34	42.34	50.40	3.83	0.30	2.77		
Fuel Oil Combustion	10,744.87	2.40	9.60	0.96	19.08	0.16		
Fugitive PM from Roadways				5.79				
Backcoater						37.05		
#1 Coil Wire Brush Cleaning				0.44				
#2 Coil Wire Brush Cleaning				0.44				
#3 Sheet Wire Brush Cleaning				0.44				
Totals	71,361.11	44.74	60.00	99.93	19.38	90.38	9.0	22.5