

FINAL DRAFT/PROPOSED CAAPP PERMIT
Alton Steel, Inc.
I.D. No.: 119010AAE
Application No.: 96020056
November 7, 2003

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Alton Steel, Inc.
Attn: D. Jeannine Kelly, Environmental Attorney
No. 5 Cut Street
Alton, Illinois 62002

<u>Application No.:</u> 96020056	<u>I.D. No.:</u> 119010AAE
<u>Applicant's Designation:</u>	<u>Date Received:</u> February 15, 1996
<u>Operation of:</u> Steel Mill	
<u>Date Issued:</u> TO BE DETERMINED	<u>Expiration Date</u> ² : DATE
<u>Source Location:</u> No. 5 Cut Street, Alton, Madison County, IL 62002	
<u>Responsible Official:</u> Melvin Cook/President	

This permit is hereby granted to the above-designated Permittee to operate a Steel Mill, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Darin Clutts at 217/782-2113.

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

DES:DCC:psj

cc: Illinois EPA, FOS, Region 3
CES
Lotus Notes

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 - federal PSD and 35 IAC Part 203 - 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

Alton Steel, Inc.
No. 5 Cut Street
Alton, Illinois 62002
618/465-0123

I.D. No.: 119010AAE
Standard Industrial Classification: 3311, Steel Mill

1.2 Owner/Parent Company

Alton Steel, Inc.
No. 5 Cut Street
Alton, Illinois 62002

1.3 Operator

Alton Steel, Inc.
No. 5 Cut Street
Alton, Illinois 62002

D. Jeannine Kelly/Environmental Attorney
618/465-0123

1.4 General Source Description

Alton Steel, Inc. is located at No. 5 Cut Street in Alton, Illinois. The source is a "mini-mill" steel mill that takes scrap steel and produces steel bars. This operation includes a melt shop and rolling mills.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
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
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit

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T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 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:

None

- 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:

Sulfuric Acid Reclamation Plant
Wastewater Treatment
Motor Vehicle Fueling
Descaling
Scale Pits

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Equipment used for filling drums, pails, or other packaging containers, excluding aerosol cans, with soaps, detergents, surfactants, lubricating oils, waxes, vegetable oils, greases, animal fats, glycerin, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(8)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

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,

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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	Date Constructed	Emission Control Equipment
7.1	The Electric Melt Shop (EMS) includes electric arc furnace No. 7 (EAF7) and electric arc furnace No. 8 (EAF8) with oxy-fuel burners (OFB), three ladle preheaters (LPH) and continuous caster (CC) that has a tundish preheater (TPH), tundish dryer (TD), tundish shakeout (TS) and cutting torches (CT).	1965	A ceiling canopy that vents to two EMS baghouses. The meting and refining stage of EAF7 and EAF8 are controlled by a direct evacuation control system that vents to the two EMS baghouses.
7.2	The Ladle Metallurgy (LM) process includes the ladle furnace (LF), lime silo (LS) and lime surge bin (LSB).	1994	Baghouse
7.3	The Rolling Mills (RM) includes a 14 inch rolling mill (RM14) with a reheat furnace (RHF14) and an 8 inch rolling mill (RM8) with a reheat furnace (RHF8).	RM14 1968 RM8 1913	None
7.4	Gasoline Storage (GS) includes a 1000 gallon aboveground storage tank (AST).	1989	Submerge Fill and Vapor Balance System
7.5	Parts Washing (PW) includes the cleaning of metal parts in one of several small cold cleaning degreasers (CCD).	---	None
7.6	Fugitive emissions include material handling (MH), e.g., slag, baghouse dust, lime, storage piles (SP), unpaved roadways (UR), paved roadways (PR) and parking lots (PL).	---	Water or Chemical Dust Suppressant for UR

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of CO and NO_x emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.
- 5.1.3 For purposes of the CAAPP, Alton Steel, Inc. is considered a single source with International Mill Service, Inc., I.D. No. 119010ACZ, located at 25 Hull Lane, Alton, Illinois. The source has elected to obtain separate CAAPP permits for these locations.

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. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- 5.2.3 Fugitive Particulate Matter Operating Program
 - a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly

reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.2.4 Ozone Depleting Substances

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

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

5.2.5 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.
- 5.2.6
- 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 potentially applicable regulation which was promulgated after the date issued of this permit.
- 5.2.7 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.

5.2.9 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicability of Regulations of Concern

- 5.3.1 This permit is issued based on the source not being subject to 40 CFR 63, Subpart EEEEE, National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries because the source is not an Iron or Steel Foundry as defined in 40 CFR 63.7762 and is not a major source of HAPs. (See also Condition 5.5.2.)
- 5.3.2 This permit is issued based on the source not being subject to 40 CFR 63, Subpart FFFFF, National Emission Standards for Hazardous Air Pollutants for Integrated Iron and Steel Manufacturing Facilities because the source is not an Integrated Iron and Steel Manufacturing Facility as

defined in 40 CFR 63.7852 and is not a major source of HAPs. (See also Condition 5.5.2.)

5.3.3 This permit is issued based on the source not being subject to 40 CFR 63, Subpart T, National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning Machines because the source does not use a halogenated solvent in its cold cleaning operations.

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

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. 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)	162.41
Sulfur Dioxide (SO ₂)	54.88
Particulate Matter (PM)	203.32
Nitrogen Oxides (NO _x)	1163.93
HAP, not included in VOM or PM	----
TOTAL	1584.54

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 CAA not 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 minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source 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. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for HAP Emissions

Records of HAP emissions for the emission units are covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

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

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

- a. The annual emissions of individual HAPs for each month of the previous calendar year, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and
- b. The total emissions of all HAPs combined for each month of the previous calendar year, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

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6.0 [NOT APPLICABLE TO THIS PERMIT]

7.0 UNIT SPECIFIC CONDITIONS

7.1 Electric Melt Shop

7.1.1 Description

The Electric Melt Shop (EMS) includes electric arc furnace No. 7 (EAF7) and electric arc furnace No. 8 (EAF8) with oxy-fuel burners (OFB), three ladle preheaters (LPH) and continuous caster (CC) that has a tundish preheater (TPH), tundish dryer (TD), tundish shakeout (TS) and cutting torches (CT). All are controlled by a ceiling canopy that vents to two EMS baghouses. The meting and refining stage of EAF7 and EAF8 are controlled by a direct evacuation control system that vents to the two EMS baghouses.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EAF7	Electric Arc Furnace No. 7	EMS Baghouse
EAF8	Electric Arc Furnace No. 8	EMS Baghouse
LPH	Ladle Preheaters	EMS Baghouse
CC	Continuous Caster	EMS Baghouse
TPH	Tundish Preheater	EMS Baghouse
TD	Tundish Dryer	EMS Baghouse
TS	Tundish Shakeout	EMS Baghouse
CT	Cutting Torches	EMS Baghouse

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected EMS" for the purpose of these unit-specific conditions, are units described in Conditions 7.1.1 and 7.1.2.
- b. The affected EMS is subject to the opacity limits identified in Condition 5.2.2(b).
- c. The TS of the affected EMS is subject to the PM limits of 35 IAC 212.321 or 35 IAC 212.322. 35 IAC 212.321 and 35 IAC 212.322 are referenced in Attachment 10.1 and Attachment 10.2, respectively.
- d. EAF7 and EAF8 of the affected EMS are subject to 35 IAC 212.448 which states:

The total particulate emissions from meltdown and refining, charging, tapping, slagging

electrode port leakage and ladle lancing shall not exceed the allowable emission rate specified by Section 212.321 or 212.322 of this Part, whichever is applicable [35 IAC 212.448].

35 IAC 212.321 and 35 IAC 212.322 are referenced in Attachment 10.1 and Attachment 10.2, respectively.

- e. EAF7, EAF8 and CC of the affected EMS are subject to 35 IAC 214.301 which states:

Except as further provided by this Part, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm [35 IAC 214.301].

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the OFB, LPH, TPH, TD and CC of affected EMS not being subject to 35 IAC 216.121, because OFB, LPH, TPH, TD and CC are not defined as fuel combustion emission units pursuant to 35 IAC 211.2470.
- b. This permit is issued based on the CC of the affected EMS not being subject to 35 IAC 212.321 or 212.322 since it is subject to 35 IAC 212.450, pursuant to 35 IAC 212.441.

7.1.5 Operational and Production Limits and Control Requirements

- a. The CC of affected EMS is subject to 35 IAC 212.2450 which states:

Particulate matter emissions from liquid steel charging in continuous casting operations shall be controlled by chemical or mechanical shrouds or methods of comparable effectiveness [35 IAC 212.450].

- b. Production of steel by the affected EMS shall not exceed 211,000 tons per month and 211,000 tons per year.
- c. Operation of the affected EMS shall not exceed 120 days from initial startup.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected EMS is subject to the following:

- a. Emissions from the affected EMS shall not exceed the following limits:

<u>Pollutant</u>	<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
CO	286.3	286.3
NO _x	153.6	153.6
PM	26.98	26.98
PM ₁₀	20.96	20.96
Pb	0.32	0.32
SO ₂	74.01	74.01
VOM	17.30	17.30

These limits were established in permit 03030101 to allow for initial shakedown of a dormant source and are based on a pro-rated share of the permitted annual emissions of the former owner, Laclede Steel.

This permit is issued based on the resumption of operation of the steel mill melt shop not constituting a modification for purposes of the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21; federal New Source Performance Standards (NSPS), 40 CFR Part 60; and state rules for Major Stationary Sources Construction and Modification (35 IAC Part 203). This is because the operating permit for the steel mill was maintained by Laclede Steel and only routine maintenance, repair and replacements of components is needed to resume operation.

7.1.7 Testing Requirements

- a. Upon request by the Illinois EPA under section 114 of the act, the Permittee shall have performance test(s) conducted and furnish the Illinois EPA a written report of the results of such performance test(s).
- b. i. The following methods and procedures shall be used for testing of particulate matter emissions and opacity:

- A. Method 5 shall be used for negative pressure fabric filters and other types of control devices and Methods 5D shall be used for positive-pressure fabric filters to determine the particulate matter concentration and volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 4 hours and 4.5 dscm (160 dscf) and, when a single EAF is sampled, the sampling time shall include an integral number of heats.
 - B. Method 9 and the procedures of 40 CFR 60.11 shall be used to determine opacity.
- ii. The following methods and procedures shall be used for testing emissions of pollutants. Refer to 40 CFR 60, Appendix A for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
Particulate Matter	USEPA Method 5
Sulfur Dioxide	USEPA Method 6, 6a, 6b or 6c
Nitrogen Oxide	USEPA Method 7
Carbon Monoxide	USEPA Method 10
Lead	USEPA Method 12 or Method 29
Volatile Organic Material	USEPA Method 25A
PM ₁₀	USEPA Method 201 or 201A

- c. At least 60 days prior to the actual date of testing, a written test plan shall be submitted to the Illinois EPA for review and approval. The plan shall describe the specific procedures for testing including as a minimum:
- i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - ii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of

the maximum emissions, the levels of operating parameters at or within which compliance is intended to be shown, if parameters for the process and any control equipment will be determined.

- iii. The specific determination of emissions and operations which are intended to be made, including sampling and monitoring locations.
 - iv. The test methods which will be used, with the specific analysis method.
 - v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
 - vi. A statement that the testing will be performed by a qualified independent testing service.
- d. Prior to carrying out these tests, the Illinois EPA shall be notified a minimum of thirty (30) days prior to the scheduled date of these tests with the exact date, time and place of these tests, to enable the Illinois EPA to witness these tests.
 - e. If the scheduled date for the test is changed the Permittee shall inform the Illinois EPA within five working days of the scheduled test date and must specify the date of the rescheduled test.
 - f. A copy of the Final Reports for these tests and compliance status shall be submitted to the Illinois EPA within fourteen days after the test results are compiled and finalized, prior to or accompanying the operating permit application. Satisfactory completion of these tests and compliance with the limitations of this permit shall be prerequisite to the issuance of an operating permit.

7.1.8 Monitoring Requirements

Upon request to stack test, the following operating parameters shall be monitored to ensure ongoing compliance with emission limits:

- a. Pressure drop across the baghouse of the affected EMS; and

- b. Power supplied to baghouse fan.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected EMS to demonstrate compliance with Conditions 5.5.1, 7.1.3, 7.1.5, 7.1.6 and 7.1.8, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of steel production in tons per month and tons per year.
- b. Records of natural gas usage in standard cubic feet per month and standard cubic feet per year.
- c. Records of TS, e.g., 6 tons per shakeout, in shakeouts per month and shakeouts per year.
- d. Records of deviations from the monitored operating parameters of Condition 7.1.8 determined from the stack test required by Condition 7.1.7.
- e. Records of emissions in tons per month and tons per year.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected EMS with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions from or operation of the affected EMS in excess of the limits specified in Conditions 7.1.3, 7.1.5 and 7.1.6 within 30 days of such occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(b), 7.1.3(c) and 7.1.3(d) is demonstrated by the control limit in Condition 7.1.5(a), testing requirement of Condition

7.1.7, monitoring requirements in Condition 7.1.8 and recordkeeping requirements of 7.1.9.

- b. Compliance with Condition 7.1.3(e) is demonstrated by the testing requirement of Condition 7.1.7.
- c. Compliance with Condition 7.1.5(b) is demonstrated by the recordkeeping requirements of 7.1.9(a).
- d. Compliance with the emission limits in Conditions 5.5 and 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:
 - i. Emission factors for EAF7 and EAF8 of the affected EMS:

Emission Factors	
<u>Pollutant</u>	<u>(lb/ton)</u>
VOM	0.15
PM	0.27
PM ₁₀	0.21
Pb	0.0034
SO ₂	0.7
NO _x	0.5
CO	2.0

The emission factor for VOM is based on typical emissions currently achieved by electric arc furnaces. The emission factor for PM is based on the maximum grain loading for the baghouse filter capability of 0.0052 gr/dscf, maximum baghouse flow rate of 446,134 scf/min, maximum hours of operation of 2,880 hrs/yr and maximum steel production of 211,000 tons/yr. The PM₁₀ emission factor is based on a 76% cumulative mass percent of the PM emission factor in Table 12.5-2, AP-42 (dated 1/95). The Pb emission factor is based on 1.96% of PM from an analysis of baghouse dust. The SO₂ emission factor is based on a November 2000 stack test. The NO_x emission factor is based on values found in Table 1 of "Minimill Emission Factors Advantages and Limitations" by Robert Geddis. The CO emission factor is based on a March 1989 stack test.

Emission formula for EAF7 and EAF8 of the affected EMS:

$$(\text{Emissions, lb}) = (\text{The Appropriate Emission Factor, lb/ton}) \times (\text{Steel Production, tons})$$

- ii. Emission factors for natural gas combustion by LPH, TPH, TD and CT of the affected EMS:

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

The emission factors (lb/mmscf) are for Natural Gas-Fired Small Boilers (<100 mmBtu/hr Heat Input) from AP-42 Section 1.4 (dated 7/98).

Emission formula for the LPH, TPH, TD and CT of the affected EMS:

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

- iii. Emission factors for TS of the affected EMS:

Emission Factors	
<u>Pollutant</u>	<u>(lb/ton)</u>
PM	0.15
PM ₁₀	0.015

The emission factor for TS is from screening of crushed stone, Table 11.19.2-2, AP-42 (dated 1/95).

Emission formula for the TS of the affected EMS:

$$(\text{Emissions, lb}) = (\text{The Appropriate Emission Factor, lb/ton}) \times (\text{Material in Shakeout, tons}) \times (\text{Baghouse Control Efficiency, } 1 - 0.95)$$

7.2 Ladle Metallurgy

7.2.1 Description

The Ladle Metallurgy (LM) process includes the ladle furnace (LF), lime silo (LS) and lime surge bin (LSB). The LF, LS and LSB are all controlled by there own baghouse. Molten steel is brought from the EMS for further refining. Refining takes place in the LF in batches where lime is added from the LSB which is fed by the LS.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
LF	Ladle furnace	Baghouse
LS	Lime silo	Baghouse
LSB	Lime surge bin	Baghouse

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected LM" for the purpose of these unit-specific conditions, are units described in Conditions 7.2.1 and 7.2.2.
- b. The LF, LS and LSB of the affected LM are subject to the emission limits identified in Condition 5.2.2.
- c. The LF, LS and LSB of the affected LM are subject to the PM limits of 35 IAC 212.321 or 35 IAC 212.322. 35 IAC 212.321 and 35 IAC 212.322 are referenced in Attachment 10.1 and Attachment 10.2, respectively.
- d. The LF, LS and LSB of the affected LM are subject to 35 IAC 214.301 which states:

Except as further provided by this Part, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm [35 IAC 214.301].

7.2.4 Non-Applicability of Regulations of Concern

N/A

7.2.5 Operational and Production Limits and Work Practices

The LF is limited to 14 batches per day

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the LF and LS of the affected LM are subject to the following:

- a. Emissions from the affected LF shall not exceed the following limits:

<u>Pollutant</u>	<u>(Lb/Month)</u>	<u>(Ton/Year)</u>
PM	333	2.03

These limits are based on the controlled emission rate of 0.793 pounds per batch and the limit in Condition 7.2.5. 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 (running 12 month total).

The above limitations were established in Permit 93100108, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

- b. Emissions from the affected LS shall not exceed the following limits:

<u>Pollutant</u>	<u>(Lb/Month)</u>	<u>(Ton/Year)</u>
PM	333	1.50

These limits are based on the controlled emission rate of 0.342 pound per hour and 8736 hours per year operation. 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 (running 12 month total).

The above limitations were established in Permit 93100108, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.2.7 Testing Requirements

- a. Upon request by the Illinois EPA under section 114 of the act, the Permittee shall have performance test(s) conducted and furnish the Illinois EPA a written report of the results of such performance test(s).
- b. The following methods and procedures shall be used for testing emissions of pollutants other than particulate matter. Refer to 40 CFR 60, Appendix A for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
Particulate Matter	USEPA Method 5 or 5D
Sulfur Dioxide	USEPA Method 6, 6a, 6b or 6c
Nitrogen Oxide	USEPA Method 7
Opacity	USEPA Method 9
Carbon Monoxide	USEPA Method 10
Lead	USEPA Method 12 or Method 29
Volatile Organic Material	USEPA Method 25A
PM ₁₀	USEPA Method 201 or 201A

- c. At least 60 days prior to the actual date of testing, a written test plan shall be submitted to the Illinois EPA for review and approval. The plan shall describe the specific procedures for testing including as a minimum:
 - i. The person(s) who will be performing sampling and analysis and their experience with similar tests.

- ii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum emissions, the levels of operating parameters at or within which compliance is intended to be shown, if parameters for the process and any control equipment will be determined.
 - iii. The specific determination of emissions and operations which are intended to be made, including sampling and monitoring locations.
 - iv. The test methods which will be used, with the specific analysis method.
 - v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
 - vi. A statement that the testing will be performed by a qualified independent testing service.
- d. Prior to carrying out these tests, the Illinois EPA shall be notified a minimum of thirty (30) days prior to the scheduled date of these tests with the exact date, time and place of these tests, to enable the Illinois EPA to witness these tests.
 - e. If the scheduled date for the test is changed the Permittee shall inform the Illinois EPA within five working days of the scheduled test date and must specify the date of the rescheduled test.
 - f. A copy of the Final Reports for these tests and compliance status shall be submitted to the Illinois EPA within fourteen days after the test results are compiled and finalized, prior to or accompanying the operating permit application. Satisfactory completion of these tests and compliance with the limitations of this permit shall be prerequisite to the issuance of an operating permit.

7.2.8 Monitoring Requirements

Upon request to stack test, the following operating parameters shall be monitored to ensure ongoing compliance with emission limits:

- a. Pressure drop across the baghouse of the LF, LS or LSB of the affected LM; and
- b. Power supplied to baghouse fan.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected LM to demonstrate compliance with Conditions 5.5.1, 7.2.3, 7.2.5, 7.2.6 and 7.2.8, pursuant to Section 39.5(7) (b) of the Act:

- a. Records of steel batches, including a predetermined value of tons of steel per batch, in tons per month and tons per year.
- b. Records of natural gas usage in standard cubic feet per month and standard cubic feet per year.
- c. Records of lime throughput in tons per month and tons per year.
- d. Records of deviations from the monitored operating parameters of Condition 7.2.8 determined from the stack test required by Condition 7.2.7.
- e. Records of emissions in tons per month and tons per year.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected LM with the permit requirements as follows, pursuant to Section 39.5(7) (f) (ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions from or operation of the affected EMS in excess of the limits specified in Conditions 7.2.3, 7.2.5 and 7.2.6 within 30 days of such occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(b) and 7.2.3(c) is demonstrated by the operating and production limit in Condition 7.2.5, testing requirement of Condition 7.2.7, monitoring requirements in Condition 7.2.8 and recordkeeping requirements of 7.2.9.
- b. Compliance with Condition 7.2.3(d) is demonstrated by the testing requirement of Condition 7.1.7.
- c. Compliance with Condition 7.2.5 is demonstrated by the recordkeeping requirements of 7.2.9(a).
- d. Compliance with the emission limits in Conditions 5.5 and 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

- i. Emission factors for the LF of the affected LM:

Emission Factors	
<u>Pollutant</u>	<u>(lb/ton)</u>
PM	0.16
PM ₁₀	0.16

The emission factors are based on a manufacturer's guarantee of 0.003 gr/scf, maximum baghouse flow rate of 46,366 scf/min, maximum hours of operation of 2,880 hrs/yr and maximum steel production of 211,000 tons/yr.

Emission formula for the LF of the affected LM:

$$(\text{Emissions, lb}) = (\text{The Appropriate Emission Factor, lb/ton}) \times (\text{Steel Throughput, ton})$$

- ii. Emission factors for natural gas combustion by LF of the affected LM:

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

The emission factors (lb/mmscf) are for Natural Gas-Fired Small Boilers (<100 mmBtu/hr Heat Input) from AP-42 Section 1.4 (dated 7/98).

Emission formula for the LF of the affected LM:

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

iii. Emission factors for the LS of the affected LM:

Emission Factors	
<u>Pollutant</u>	<u>(lb/hr)</u>
PM	0.072
PM ₁₀	0.072

The emission factors are based on manufacturers guarantee of 0.02 gr/scf, maximum blower capacity for lime transfer of 420 acf/min.

Emission formula of the LS of the affected LM:

$$(\text{Emissions, lb}) = (\text{The Appropriate Emission Factor, lb/hr}) \times (\text{Lime Transferred, hours})$$

iv. Emission factors for the LSB of the affected LM:

Emission Factors	
<u>Pollutant</u>	<u>(lb/hr)</u>
PM	0.27
PM ₁₀	0.27

The emission factors are based on manufacturers guarantee of 0.02 gr/scf, maximum blower capacity for lime transfer of 1575 acf/min.

Emission formula of the LSB of the affected LM:

$$(\text{Emissions, lb}) = (\text{The Appropriate Emission Factor, lb/hr}) \times (\text{Lime Transferred, hours})$$

7.3 Rolling Mills

7.3.1 Description

The Rolling Mills (RM) includes a 14 inch rolling mill (RM14) with a reheat furnace (RHF14) and an 8 inch rolling mill (RM8) with a reheat furnace (RHF8). Cast steel blooms from the continuous caster of the EMS are reheated in a furnace and rolled into steel billets in the 14 inch mill. The steel billets are reheated in a furnace and rolled into steel bars in the 8 inch mill

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
RHF14	14 inch rolling mill reheat furnace	None
RM14	14 inch rolling mill	None
RHF8	8 inch rolling mill reheat furnace	None
RM8	8 inch rolling mill	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected RM" for the purpose of these unit-specific conditions, are units described in Conditions 7.3.1 and 7.3.2.
- b. Each affected RM is subject to the emission limits identified in Condition 5.2.2.
- c. The RM14 and RM8 of the affected RM is subject to 35 IAC 219.301 which states:

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 Sections 219.302, 219.303, 219.304 of this Part and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material [35 IAC 219.301].

7.3.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the RHF14 and RHF8 of the affected RM not being subject to 35 IAC 216.121,

because the RHF14 and RHF8 of the affected RM are not defined as fuel combustion emission sources pursuant to 35 IAC 211.2470.

- b. This permit is issued based on the RHF14 and RHF8 of the affected RM not being subject to 35 IAC 217, Subpart B and Subpart C, because the RHF14 and RHF8 of the affected RM are not defined as fuel combustion emission sources pursuant to 35 IAC 211.2470.
- c. This permit is issued based on the RHF14, RM14, RHF8 and RM8 of the affected RM not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected RHF and RRM does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Operational and Production Limits and Work Practices

None

7.3.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

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 the RHF14, RM14, RHF8 and RM8 of the affected RM to demonstrate compliance with Conditions 5.5.1 and 7.3.3, pursuant to Section 39.5(7) (b) of the Act:

- a. Records of steel throughput in tons per month and tons per year.
- b. Records of natural gas combusted in standard cubic feet per month and standard cubic feet per year.

- c. Records of rolling lubricants in gallons per month and gallons per year.
- d. Records of emissions in tons per month and tons per year.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the RHF14, RM14, RHF8 and RM8 of the affected RM with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions from or operation of the RHF14, RM14, RHF8 and RM8 of the affected RM in excess of the limits specified in Condition 7.3.3 within 30 days of such occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. Compliance with Conditions 7.3.3(b) and 7.3.3(c) are considered to be assured by the inherent nature of the operations of the RHF14, RM14, RHF8 and RM8 of the affected RM, as demonstrated by historical operation.
- b. Compliance with Condition 7.3.3(d) shall be demonstrated by the records required in Condition 7.3.9.
- c. Compliance with the emission limits in Condition 5.5 shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:
 - i. Emission factors for the RHF14 of the affected RM:

Emission Factors

<u>Pollutant</u>	<u>(lb/mmscf)</u>
VOM	5.5
PM	7.6
SO ₂	0.6
NO _x	280
CO	84

The emission factors (lb/mmscf) are for Natural Gas-Fired Large Boilers (>100 mmBtu/hr Heat Input) from AP-42 Section 1.4 (dated 7/98).

Emission formula for the RHF14 of the affected RM:

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

- ii. Emission factors for the RHF8 of the affected RM:

Emission Factors

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

The emission factors (lb/mmscf) are for Natural Gas-Fired Small Boilers (<100 mmBtu/hr Heat Input) from AP-42 Section 1.4 (dated 7/98).

Emission formula for the RHF14 of the affected RM:

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

- iii. Emission factors for the RM14 and RM8 of the affected RM:

Emission Factors

<u>Pollutant</u>	<u>(lb/ton)</u>
VOM	0.019

FINAL DRAFT/PROPOSED CAAPP PERMIT
Alton Steel, Inc.
I.D. No.: 119010AAE
Application No.: 96020056
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The emission factor (lb/ton) is for tons of steel rolled from "Volatilized Lubricant Emissions from Steel Rolling Operations" as presented by Mackus and Joshi at the Symposium on Iron and Steel Pollution Abatement Technology (Chicago, IL 1979)

(Emissions, lb) = (The Appropriate Emission Factor, lb/mmscf) x (Natural Gas Combusted, mmscf)

7.4 Gasoline Storage

7.4.1 Description

Gasoline Storage (GS) includes a 1000 gallon aboveground storage tank (AST). The AST is equipped with submerge fill and a vapor balance system.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
AST	1000 Gallon Aboveground Storage Tank	Submerge Fill and Vapor Balance System

7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected GS" for the purpose of these unit-specific conditions, is the unit described in Conditions 7.4.1 and 7.4.2.
- b. The AST of the affected GS is subject to the following limits:
 - i. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, or unless such tank is a pressure tank as described in 35 IAC 219.121(a) or is fitted with a recovery system as described in 35 IAC 219.121(b) (2) [35 IAC 219.122(b)].
 - ii. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 219.302, 219.303, or 219.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 219 Subpart G shall only apply to photochemically reactive material [35 IAC 219.301].
 - iii. Pursuant to 35 IAC 219.583(a), no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary

storage tank at a gasoline dispensing operation unless:

- A. The tank is equipped with a submerged loading pipe [35 IAC 219.583(a)(1)]; and
- B. Pursuant to 35 IAC 219.583(a)(2), the vapors displaced from the storage tank during filling are processed by a vapor control system that includes one or more of the following:
 - 1. A vapor collection system that meets the requirements of Condition 7.4.5(b) (see also 35 IAC 219.583(d)(4)) [35 IAC 219.583(a)(2)(A)]; or
 - 2. A refrigeration-condensation system or any other system approved by the Illinois EPA that recovers at least 90 percent by weight of all vaporized organic material from the equipment being controlled [35 IAC 219.583(a)(2)(B)]; and
 - 3. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 IAC 219.584(b) or (d) [35 IAC 219.583(a)(2)(C)].

7.4.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the AST of the affected GS not being subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels), 40 CFR Part 60, Subpart Kb, because the affected AST is less than 40 cubic meters (10,566 gallons).
- b. This permit is issued based on the AST of the affected GS not being subject to 35 IAC 219.121, because the affected AST is less than 40,000 gallons.
- c. This permit is issued based on the AST of the affected GS not being subject to 35 IAC 219.122(a), because the affected AST is less than 40,000 gallons.

- d. This permit is issued based on the AST of the affected GS not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected AST does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.4.5 Control Requirements and Work Practices

The AST of the affected GS is subject to the following control requirements and work practices:

- a. Pursuant to 35 IAC 219.583(c), each owner of a gasoline dispensing operation shall:
 - i. Install all control systems and make all process modifications required by Condition 7.4.3(b) (iii) (see also 35 IAC 219.583(a) [35 IAC 219.583(c) (1)]);
 - ii. Provide instructions to the operator of the gasoline dispensing operation describing necessary maintenance operations and procedures for prompt notification of the owner in case of any malfunction of a vapor control system [35 IAC 219.583(c) (2)]; and
 - iii. Repair, replace or modify any worn out or malfunctioning component or element of design [35 IAC 219.583(c) (3)].
- b. Pursuant to 35 IAC 219.583(d), each operator of a gasoline dispensing operation shall:
 - i. Maintain and operate each vapor control system in accordance with the owner's instructions [35 IAC 219.583(d) (1)];
 - ii. Promptly notify the owner of any scheduled maintenance or malfunction requiring replacement or repair of a major component of a vapor control system [35 IAC 219.583(d) (2)];
 - iii. Maintain gauges, meters or other specified testing devices in proper working order [35 IAC 219.583(d) (3)]; and

- iv. Pursuant to 35 IAC 219.583(d) (4), operate the vapor collection system and delivery vessel unloading points in a manner that prevents:
 - A. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B [35 IAC 219.583(d) (4) (A)]; and
 - B. Avoidable leaks of liquid during the filling of storage tanks [35 IAC 214.583(d) (4) (B)].

7.4.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.4.7 Testing Requirements

Within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, repair and retest a vapor collection system which exceeds the limits of Condition 7.4.5(b) (iv) (A) (see also 35 IAC 219.583(d) (4) (A)) [35 IAC 219.583(d) (5)].

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the AST of the affected GS to demonstrate compliance with Conditions 5.5.1, 7.4.3 and 7.4.5, pursuant to Section 39.5(7) (b) of the Act:

- a. Records of the testing and repair of the vapor collection system pursuant to Condition 7.4.7 [Section 39.5(7) (e) of the Act].
- b. Records of gasoline throughput in gallons per month and gallons per year.

- c. Records of emissions in pounds per month and tons per year using the methods in Condition 7.4.12

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the AST of affected GS with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions from or operation of an AST of the affected GS in excess of the limits specified in Conditions 7.4.3 and 7.4.5 within 30 days of such occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the AST of affected GS 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. Changes to components related to either the submerged loading pipe or submerged fill, including addition of new components and repair and replacement of components.
- b. Changes in the material stored, e.g., fuel oil, in the AST of affected GS, provided the AST of affected GS continues to comply with the Conditions of Section 7.4 of this permit.

7.4.12 Compliance Procedures

- a. Compliance with Conditions 7.4.3(b) is considered to be assured by the use of submerged loading pipe and vapor balance system as required in Condition 7.4.5 and by the recordkeeping requirement of Condition 7.4.9.
- b. For the purpose of estimating VOM emissions from the AST of affected GS, the TANKS program is acceptable.

7.5 Parts Washing

7.5.1 Description

Parts Washing (PW) includes the cleaning of metal parts in one of several small cold cleaning degreasers (CCD).

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
CCD	Cold cleaning degreasers	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. The "affected PW" for the purpose of these unit-specific conditions, are units described in Conditions 7.5.1 and 7.5.2.
- b. Each CCD of the affected PW is subject to the emission limits identified in Condition 5.2.2.
- c. The CCD of the affected PW is subject to 35 IAC 219, Subpart E which states:
 - i. The requirements of this Subpart [35 IAC 219, Subpart E] shall apply to all cold cleaning, open top vapor degreasing, and conveyORIZED degreasing operations which use volatile organic materials [35 IAC 219.181].
 - ii. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 219.302, 219.303, or 219.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 219 Subpart G shall only apply to photochemically reactive material [35 IAC 219.301].

7.5.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the CCD of affected PW not being subject to the control requirements of 35 IAC 219.182(b)(3), because the CCD of affected PW does not use a solvent with a vapor pressure greater than 32mmHg (0.6 psi) measured at 38 °C (100 °F) or

solvent that is heated above 50 °C (120 °F) or its boiling point.

- b. (See Condition 5.3.3)
- c. This permit is issued based on the CCD of affected PW not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the CCD of affected PW does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.5.5 Operational and Production Limits and Work Practices

The CCD of the affected PW is subject to the material requirements of 35 IAC 219.182(c) which states:

No person shall operate a cold cleaning degreaser with a solvent vapor pressure which exceeds 1.0 mmHg (0.019 psi) measured at 20 °C (68 °F) [35 IAC 219.182(c) (2) (B)].

7.5.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.5.7 Operating Requirements

- a. The CCD of the affected PW is subject to the operating procedures of 35 IAC 219.182(a) which states:

No person shall operate a cold cleaning degreaser unless:

- i. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere [35 IAC 219.182(a) (1)];
- ii. The cover of the degreaser is closed when parts are not being handled [35 IAC 219.182(a) (2); and
- iii. Parts are drained until dripping ceases [35 IAC 219.182(a) (3)].

- b. The CCD of the affected PW is subject to the equipment requirements of 35 IAC 219.182(b) which states:

No person shall operate a cold cleaning degreaser unless:

- i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counter-weights or a powered system if:
- A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38 °C (100 °F) [35 IAC 219.182(b) (1) (A)];
 - B. The solvent is agitated [35 IAC 219.182(b) (1) (B)]; or
 - C. The solvent is heated above ambient room temperature [35 IAC 219.182(b) (1) (C)].
- ii. The degreaser is equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:
- A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38 °C (100 °F) [35 IAC 219.182(b) (2) (A)]; or
 - B. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external [35 IAC 219.182(b) (2) (B)].
- iii. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser [35 IAC 219.182(b) (4)]; and
- iv. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray,

rather than a fine, atomized or shower spray
[35 IAC 219.182(b)(5)].

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each CCD of the affected PW to demonstrate compliance with Conditions 5.5.1, 7.5.3, 7.5.5 and 7.5.7, pursuant to Section 39.5(7)(b) of the Act:

- a. The CCD of the affected PW is subject to the recordkeeping requirements of 35 IAC 219.182(d) and (e) which states:
 - i. All persons subject to the requirements of subsection (c)(2)(B) of this section [Condition 7.5.5] must maintain records which include each purchase:
 - A. The name and address of the solvent supplier [35 IAC 219.182(d)(2)(A)];
 - B. The date of purchase [35 IAC 219.182(d)(2)(B)];
 - C. The type of solvent [35 IAC 219.182(d)(2)(C)]; and
 - D. The vapor pressure of the solvent measured in mmHg at 20 °C (68 °F) [35 IAC 219.182(d)(2)(D)].
 - ii All records required by subsection (d) of this Section shall be retained for three years and shall be made available to the Agency upon request [35 IAC 219.182(e)].
- b. Records of solvent usage in gallons per month and gallons per year.
- c. Records of emissions in tons per month and tons per year.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of a CCD of the affected PW with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions from or operation of a CCD of the affected PW in excess of the limits specified in Conditions 7.5.3, 7.5.5 and 7.5.7 within 30 days of such occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to a CCD of the affected PW 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:

Changes in the type of degreasing solvent provided the CCD of the affected PW continues to comply with the Conditions of Section 7.5 of this permit.

7.5.12 Compliance Procedures

- a. Compliance with Conditions 7.5.3(b) is considered to be assured by the material usage limits of Condition 7.5.5, the operating requirements of Condition 7.5.7 and by the recordkeeping requirement of Condition 7.5.9.
- b. Compliance with the emission limits in Conditions 5.5 shall be based on the recordkeeping requirements in Condition 7.5.9 and formula listed below:

Emission formula for a CCD of the affected PW:

$$\text{(Emissions, lb)} = [(\text{Make-up Solvent, gallons}) - (\text{Waste Solvent, gallons})] \times (\text{Solvent Density, lb/gallon})$$

7.6 Fugitive Emissions

7.6.1 Description

Vehicle traffic, wind erosion and slag processing generate fugitive emissions (FE) of particulate matter. These points of fugitive emissions include material handling (MH), e.g., slag, baghouse dust, lime, storage piles (SP), unpaved roadways (UR), paved roadways (PR) and parking lots (PL).

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
MH	Material Handling	None
SP	Storage Piles	None
UR	Unpaved Roadways	Water or Chemical Dust Suppressant
PR	Paved Roadways	None
PL	Parking Lots	None

7.6.3 Applicability Provisions and Applicable Regulations

- a. The "affected FE" for the purpose of these unit-specific conditions, are units described in Conditions 7.6.1 and 7.6.2.
- b. The MH, SP, UR, PR and PL of the affected FE are subject to 35 IAC 212.301 which states:

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 [35 IAC 212.301].

35 IAC 212.301 shall not apply and spraying pursuant to 35 IAC 212.304 through 212.310 and 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 [35 IAC 212.314].

- c. The MH of affected FE is subject to 35 IAC 212.316(f) which states:

No person shall cause or allow fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent [35 IAC 212.316(f)].

- d. The SP of affected FE is subject to 35 IAC 212.316(d) which states:

No person shall cause or allow fugitive particulate matter emissions from any storage pile to exceed an opacity of 10 percent, to be measured four ft from the pile surface [35 IAC 212.316(d)].

- e. The UR, PR and PL of affected FE are subject to 35 IAC 212.316(c) which states:

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 [35 IAC 212.316(c)].

7.6.4 Non-Applicability of Regulations of Concern

35 IAC 212.321 and 212.322 shall not apply to emission units, such as stock piles of particulate matter, to which, because of disperse nature of such emission units, such rules can not reasonably be applied [35 IAC 212.323].

7.6.5 Operational and Production Limits and Work Practices Control requirements

- a. The MH of affected FE is subject to 35 IAC 212.307 and 212.308 which state:

- i. 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 [35 IAC 212.307].

- ii. Crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations shall be sprayed with water or a surfactant solution, utilize choke-feeding or be treated by an equivalent method in accordance with an operating program [35 IAC 212.308].
- b. The SP of affected FE is subject to 35 IAC 212.304 which states:
- i. All storage piles of materials with uncontrolled emissions of fugitive particulate matter in excess of 45.4 Mg per year (50 T/yr) which are located within a source whose potential particulate emissions from all emission units exceed 90.8 Mg/yr (100 T/yr) shall be protected by a cover or sprayed with a surfactant solution or water on a regular basis, as needed, or treated by an equivalent method, in accordance with the operating program required by Sections 212.309, 212.310 and 212.312 of this Subpart [35 IAC 212.304(a)].
 - ii. Subsection (a) of this Section shall not apply to a specific storage pile if the owner or operator of that pile proves to the Agency that fugitive particulate emissions from that pile do not cross the property line either by direct wind action or re-entrainment [35 IAC 212.304(b)].
- c. The UR, PR and PL of affected FE are subject to 35 IAC 212.306 which states:

All normal traffic pattern access areas surrounding storage piles specified in Section 212.304 of 35 IAC Subpart K 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 212.309, 212.310 and 212.312 of 35 IAC Subpart K [35 IAC 212.306].

7.6.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.6.7 Operating Requirements

The MH, SP, UR, PR and PL of affected FE are subject to 35 IAC 212.309, 212.310 and 212.312 which states:

- a. i. The emission units described in Sections 212.304 through 212.308 and Sections 212.316 of 35 IAC Subpart K shall be operated under the provisions of an operating program, consistent with the requirements set forth in Sections 212.310 and 212.312 of 35 IAC Subpart K, and prepared by the owner or operator and submitted to the Agency for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
- ii. The amendment to this Section incorporating the applicability of Section 212.316 shall apply by May 11, 1993, or upon initial start-up, whichever occurs later [35 IAC 212.309(b)]
- b. 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 IAC Subpart K and shall be submitted to the Agency for its review [35 IAC 212.312].
- c. As a minimum the operating program shall include the following [35 IAC 212.310]:
 - 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 this Subpart, 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 Agency's review of the operating program [35 IAC 212.310].

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the MH, SP, UR, PR and PL affected FE to demonstrate compliance with Condition 5.5.1 and 7.6.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the application of water and/or chemical dust suppressants.
- b. Records of material handling, i.e., slag, baghouse dust, lime in tons per month and tons per year.
- c. Records of approximate material stored in tons per year.

- d. Records of approximate miles traveled by vehicles on both paved and unpaved roads in miles per year.
- e. Records of emissions in tons per year.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the MH SP, UR, PR and PL of affected FE with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions from or operation of the MH, SP, UR, PR and PL of affected FE in excess of the limits specified in Condition 7.6.3 within 30 days of such occurrence.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

- a. Compliance with Condition 7.6.3 is demonstrated by the control requirements of Condition 7.6.5 and the operating requirements of Condition 7.6.7.
- b. Compliance with the emission limits in Conditions 5.5 shall be based on the recordkeeping requirements in Condition 7.6.9 and the emission factors and formulas listed below:

- i. Emission factors for the MH of affected FE:

$$E = k(0.0032) (U/5)^{1.3} / (M/2)^{1.4}$$

E = emission factor (lb/ton), uncontrolled

k = particle size multiplier (0.74 for PM,
0.35 for PM₁₀)

U = mean wind speed (1.3-15 mph)

M = moisture content (slag 0.25%-2.0%, flue
dust 7%, limestone 0.2%)

The emission factor is for material handling for iron and steel production from AP-42, Section 13.2.4, (dated 1/95).

Emission formula for the MH of affected FE:

(Emissions, lb) = (The Appropriate Emission Factor, lb/ton) x (Material Handled, tons)

- ii. Emission factor equations for the SP of affected FE:

$$E_a = 0.1[K][s/1.5][d/235] \text{ (active)}$$

$$E_E = 0.5[s/1.5][d/235][f/15][D/90] \text{ (erosion)}$$

$$E_A = \text{Lb PM / ton of material put through storage}$$

$$E_E = \text{Lb PM / ton of material put through storage}$$

$$K = \text{Activity correction} = 1.0$$

$$s = \text{Material silt content (\%)}$$

$$d = \text{Number of dry days per year}$$

$$f = \text{Percentage of time wind speed exceed 12 mph at 1 ft above ground}$$

$$D = \text{Duration of material stored (days)}$$

Equations from USEPA guidance document "Particulate Emission Factors Applicable to The Iron and Steel Industry" (EPA-450/4-79-028)

$$\text{Emissions, lb) = (Calculated Emission Factor, lb/ton) x (Material in Storage, tons)}$$

- iii. Emission factor equation for the UR of affected FE:

$$E = 10(s/12)^{0.8}(W/3)^{0.5}/(M/0.2)^{0.4} [(365-p)/365]$$

$$E = \text{Pounds of PM per vehicle mile traveled (lb/VMT)}$$

$$s = \text{Surface material silt content (\%) = 6.0}$$

W = Mean vehicle weight (tons)

M = Surface material moisture content (%)

P = Number of days with at least 0.01 inch of
rain per year

Equation from AP-42 Section 13.2.2 (dated 9/98)

Emissions, lb) = (Calculated Emission Factor,
lb/VMT) x (Vehicle Miles Traveled, miles)

iv. Emission factor equation for the PR and PL of
affected FE:

$$E = 0.082 (sL/2)^{0.65} (W/3)^{1.5} [(365-p)/365]$$

E = Pounds of PM per vehicle mile traveled
(lb/VMT)

sL = Road surface silt loading (g/m²) = 9.7

W = Mean vehicle weight (tons)

M = Surface material moisture content (%)

p = Number of days with at least 0.01 inch of
rain per year

Equation from AP-42 Section 13.2.1 (dated 10/02)

Emissions, lb) = (Calculated Emission Factor,
lb/VMT) x (Vehicle Miles Traveled, miles)

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 _____ **{insert public notice start date}** (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].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

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

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, 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]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these

conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

- d. The specific 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
2009 Mall Street
Collinsville, Illinois 62234
 - 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 (AE - 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 ("Title 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

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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 CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, 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 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)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- 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 authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or

resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. 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)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for

continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

- b. Other records required by this permit 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 - 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)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Emissions of Particulate Matter from New Process Emission Units

10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- 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, 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)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

where:

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

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

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

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

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

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

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

10.2 Attachment 2 Emissions of Particulate Matter from Existing Process Emission Units

10.2.1 Process Emission Units for Which Construction or Modification Commenced Prior to After April 14, 1972

- a. 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 at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

where:

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

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

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

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

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

c. Limits for Process Emission Units For Which
 Construction or Modification Commenced Prior to
 April 14, 1972 [35 IAC 212.322(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

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10.3 Attachment 3 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: _____

10.4 Attachment 4 Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

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- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



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

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24. Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25. Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26. Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28. Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29. If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	_____
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.6 Attachment 6 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance certification for the source. For this purpose, the Illinois EPA will accept a copy of the most recent form 401-CAAPP, ANNUAL COMPLIANCE CERTIFICATION submitted to the Illinois EPA.
3. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
4. Information addressing any outstanding transfer agreement pursuant to the ERMS.
5.
 - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.
 - b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

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The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

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

DCC:psj