

PROPOSED DRAFT CAAPP PERMIT
November 7, 2011

Attention: Mark Giblin, Environmental Manager

Chicago Heights Steel
211 East Main Street
Chicago Heights, Illinois 60411

State of Illinois

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Source:

Chicago Heights Steel
211 East Main Street
Chicago Heights, Illinois 60411

I.D. No.: 031045ABS
Permit No.: 96030081

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/782-2113

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Type of Application: Renewal

Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 031045ABS

Permit No.: 96030081

Statement of Basis No.: 96030081-1

Date Application Received: December 28, 2009

Date Issued: TO BE DETERMINED

Expiration Date: TO BE DETERMINED

Renewal Submittal Date: 9 Months Prior to (TO BE DETERMINED)

Source Name: Chicago Heights Steel

Address: 211 East Main Street

City: Chicago Heights

County: Cook

ZIP Code: 60411

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

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

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

ECB:MTR:AB:

cc: IEPA, Permit Section
IEPA, FOS, Region 1

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Section 1 - Source Information

1. Addresses

Source

Chicago Heights Steel
 211 East Main Street
 Chicago Heights, Illinois 60411

Owner

Chicago Heights Steel
 211 East Main Street
 Chicago Heights, Illinois 60411

Operator

Chicago Heights Steel
 211 East Main Street
 Chicago Heights, Illinois 60411

Permittee

The owner or operator of the source as identified in this table.

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Bradley Corral	President
<i>Delegated Authority</i>	No other individuals have been authorized by the IEPA.	N/A

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Mark Giblin	708/756-5651	mark@chs.com
<i>Technical Contact</i>	Mark Giblin	708/756-5651	mark@chs.com
<i>Correspondence</i>	Rich Gollner	708/756-5668	rich@chs.com
<i>Billing</i>	Rich Gollner	708/756-5668	rich@chs.com

3. Single Source

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

Section 2 - General Permit Requirements

1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No owner or operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the owner or operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
 - i. An emergency occurred and the source can identify the cause(s) of the emergency.
 - ii. The source was at the time being properly operated.
 - iii. The source submitted notice of the emergency to the IEPA within 2 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.
 - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

The source 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, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source 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]

c. Duty to Maintain Equipment

The source 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. [Section 39.5(7)(a) of the Act]

d. 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 there under. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

- i. The source must pay fees to the IEPA 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]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

- iv. Sample or monitor any substances or parameters at any location at reasonable times:
 - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
 - B. As otherwise authorized by the Act.
- v. 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.

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall 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 the owner or operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.
 - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source 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]

4. Testing

- a. 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 if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. 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 IEPA shall be submitted as specified in Condition 6.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]
- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- i. Testing by Owner or Operator: The IEPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
- ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

b. Retention of Records

- i. 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]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by including the following:
 - A. The identification of each term or condition of this permit that is the basis of the certification.

- B. The compliance status.
 - C. Whether compliance was continuous or intermittent.
 - D. 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.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
 - iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6.

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source 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 IEPA, 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 **Error! Bookmark not defined.** (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR."
 - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN."
 - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

9. Reopening and Revising Permit

a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, 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]

b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;

- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA 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 source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

10. 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]

11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(1) and (o) of the Act]
- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the 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.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 - Source Requirements

1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, 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 unless the wind speed is greater than 25 mph.
- ii. Periodic Monitoring Compliance Method

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

b. Emissions Reduction Market System (ERMS)

Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS. The allotment of ATUs to this source is 722 ATUs per seasonal allotment period. The Permittee shall comply with the ERMS Requirements of Condition 7.2.

c. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), 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:

- i. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- ii. 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.
- iii. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- iv. Any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR Subpart B, Servicing of Motor Vehicle Air Conditioners.
- v. All persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

d. Asbestos Demolition and Renovation

- i. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- ii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

e. Future Emission Standards

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee 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 Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

2. Applicable Plans and Programs

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive PM Operating Program

- i. Pursuant to 35 IAC 212.309, this source shall be operated under the provisions of Fugitive PM Operating Program prepared by the Permittee and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). The Permittee shall comply with the Fugitive PM Operating Program and any amendments to the Fugitive PM Operating Program submitted pursuant to Condition 3.2(a)(ii). As a minimum, the Fugitive PM Operating Program shall include provisions identified in 35 IAC 212.310(a) through (g) and the following:
 - A. A detailed description of the best management practices utilized to achieve compliance with 35 IAC 212.304 through 212.308.
 - B. Estimated frequency of application of dust suppressants by location.
 - C. Such other information as may be necessary to facilitate the IEPA's review of the Fugitive PM Operating Program.
- ii. Pursuant to 35 IAC 212.312, the Fugitive PM Operating Program shall be amended from time to time by the Permittee so that the Fugitive PM Operating Program is current. Such amendments shall be consistent with the requirements set forth by this Condition 3.2(a) and shall be submitted to the IEPA within 30 days of such amendment. Any future revision to the Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- iii. The Fugitive PM Operating Program, as submitted by the Permittee on April 24, 2009, is incorporated herein by reference. The document constitutes the formal Fugitive PM Operating Program required under 35 IAC 212.310, addressing the control of fugitive particulate matter emissions from all plant roadways, including the iron-making and steel-making roads, storage piles, access areas near storage piles, and other subject operations located at the facility that are subject to 35 IAC 212.309.

- iv. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Fugitive PM Operating Program, any amendments or revisions to the Fugitive PM Operating Program (as required by Condition 3.2(a)), and the Permittee shall also keep a record of activities completed according to the Fugitive PM Operating Program.

b. PM₁₀ Contingency Measure Plan

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM₁₀ Contingency Measure Plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM₁₀ Contingency Measure Plan.

c. Episode Action Plan

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.
- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on June 22, 1987, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO₂, PM₁₀, NO₂, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

d. Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit 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, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

3. Title I Requirements

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Section.

4. Synthetic Minor Limits

- a. i. Pursuant to Section 39.5(7)(a) of the Act, total emissions of HAPs from the source shall not exceed the following limits established below:

HAP	HAP Usage (Ton/year)	HAP Emissions (Ton/year)
Individual HAP	8.0	8.0
Total HAP's	20.0	20.0

- ii. Periodic Monitoring Compliance Method (HAP Emission Limits)

- A. Pursuant to Section 39.5(7)(b) of the Act, 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).
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the records of HAP content in the coating or solvents applied at the source on a monthly and annual basis. This data may be based on either internal HAP analyses performed by the Permittee or on the supplier's HAP data.
- C. Pursuant to Section 39.5(7)(b) of the Act, if in the previous calendar year, emissions of HAPs exceeded the limits identified in Condition 3.4(a)(i), then testing for HAPs using USEPA Method 311 shall be conducted as follows:

Test the top five coatings or solvents that make the largest contributions to individual and total HAP emissions. The largest contributions are defined as the product of usage and HAP content. If two coatings differ only in pigment, then both do not have to be tested.
- D. Pursuant to Section 39.5(7)(b) of the Act, the calculation as to whether the HAP emission limits in Condition 3.4(a)(i) have been exceeded shall be based on records and procedures established here and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15. Any such tests are also subject to the testing procedures of Condition 7.1 of this permit.
- E. Pursuant to 39.5(7)(d) of the Act, the Permittee shall keep monthly and annual records of individual and total HAP usage (ton/mo and ton/yr), HAP emissions (ton/mo and ton/yr) and the test data established by the Permittee.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
- Requirements in Conditions 3.1(a) and 3.1(b).
 - Requirements in Conditions 3.4(a)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

b. Semiannual Reporting

- i. The Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required periodic monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit. Addresses are included in Attachment 3.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	July 31
July through December	January 31

- ii. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report.
- iii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

Section 4 - Emission Unit Requirements

4.1 Reheat Furnace

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Reheat Furnace	PM, NO _x , CO, VOM, SO ₂	1959	2009	None	None

2. Applicable Requirements

For the emission unit in Condition 4.1(1) above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Periodic Monitoring Compliance Method (Opacity Requirements)

A. Pursuant to Section 39.5(7)(a) and (d) of the Act, annual opacity observations shall be performed by a certified observer in accordance with Method 9 for each emission unit, as identified above in Condition 4.1(1), when such unit is operating. The duration of opacity observations shall be at least 30 minutes unless no visible emissions are observed during the first 12 minutes of observations.

B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep records of opacity observations.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.321(c).

B. Pursuant to Construction Permit #07080030, the Permittee shall not exceed the following limits of PM emissions established for reheat furnace [T1]: 0.31 ton/mo and 3.1 ton/yr.

ii. Periodic Monitoring Compliance Method (PM Requirements)

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:

- A file containing the emission factors used by the Permittee to determine emissions of PM, with supporting documentation.
- Monthly and annual emissions of PM (tons/month and tons/year), with supporting calculations.
- Natural gas usage of reheat furnace (ft³/month and ft³/year).
- Amount of steel processed (ton/mo and ton/yr).
- Records of the allowable PM emissions outlined by 35 IAC 212.321(c) based on the actual process weight rates of material processed.

B. Pursuant to Construction Permit #07080030, compliance with annual limits shall be determined on a monthly basis from the sum of the data from the current month plus the preceding 11 months (running 12 month total).

c. i. Sulfur Dioxide Requirements (SO₂)

A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

ii. Periodic Monitoring Compliance Method (SO₂ Requirements)

A. See Condition 4.1.2(g) for pipeline quality natural gas is in use.

d. i. Nitrogen Oxide Requirements (NO_x)

Pursuant to Construction Permit #07080030, the Permittee shall not exceed the following limits of NO_x established for reheat furnace [T1]:

A. 0.124 lb/mmBtu or 11.78 lb/hr.

B. 5.2 ton/mo and 51.60 ton/yr.

ii. Periodic Monitoring Compliance Method (NO_x Requirements)

A. Pursuant to Construction Permit #07080030, compliance with the limits in Condition 4.1(2)(d)(i)(A) shall be determined on a monthly basis from the sum of the data from the current month plus the preceding 11 months (running 12 month total).

B. Pursuant to Construction Permit #07080030, compliance with annual limits in Condition 4.1(2)(d)(i)(B) shall be determined on 24 hour average.

C. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform visual inspections and scheduled tune-ups of the furnace's burners when the furnace is idled at least bi-annually or in accordance with the manufacturer's specifications, whatever coming first.

D. Pursuant to Section 39.5(7)(a) of the Act, once every 5 years, the Permittee shall perform testing of NO_x emissions from the reheat furnace measured by an approved testing service, during conditions representative of normal operation, by using the following test methods and procedures established in Condition 7.1 of this permit:

Location of Sample Points	Method 1
Gas Flow and Velocity	Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
NO _x	Method 7E or 19

C. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to NO_x emissions:

- A file containing the emission factors derived from the most recent stack test and used by the Permittee to determine emissions of NO_x, with supporting documentation.
- Records of monthly and annual emissions of NO_x (tons/month and tons/year), with supporting calculations.
- Records of short-term emissions of NO_x (lb/mmBtu or lb/hr).
- Records of inspections and tune-ups performed.
- Records of NO_x testing conducted on the reheat furnace.
- Natural gas usage of reheat furnace (ft³/month and ft³/year).

e. i. Volatile Organic Material Requirements (VOM)

- A. Pursuant to Construction Permit #07080030, the Permittee shall not exceed the following limits of VOM emissions established for reheat furnace [T1]: 0.23 ton/mo and 2.24 ton/yr.
- ii. Periodic Monitoring Compliance Method (VOM Requirements)
- A. Pursuant to Construction Permit #07080030, compliance with the annual limit shall be determined on a monthly basis from the sum of the data from the current month plus the preceding 11 months (running 12 month total).
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to VOM emissions:
- A file containing the emission factors used by the Permittee to determine emissions of VOM, with supporting documentation.
 - Monthly and annual emissions of VOM (tons/month and tons/year), with supporting calculations.
 - Natural gas usage of reheat furnace (ft³/month and ft³/year).
- f. i. Carbon Monoxide Requirements (CO)
- A. Pursuant to Construction Permit #07080030, the Permittee shall not exceed the following limits of CO emissions established for reheat furnace [T1]: 3.4 ton/mo and 34.3 ton/yr. Compliance with annual limits shall be determined on a monthly basis from the sum of the data from the current month plus the preceding 11 months (running 12 month total).
- ii. Periodic Monitoring Compliance Method (CO Requirements)
- A. Pursuant to Construction Permit #07080030, compliance with the annual limit shall be determined on a monthly basis from the sum of the data from the current month plus the preceding 11 months (running 12 month total).
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform visual inspections and scheduled tune-ups of the furnace's burners when the furnace is idled at least bi-annually or in accordance with the manufacturer's specifications, whatever coming first.
- C. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to CO emissions:
- A file containing the emission factors used by the Permittee to determine emissions of CO, with supporting documentation.
 - Monthly and annual emissions of CO (tons/month and tons/year), with supporting calculations.
 - Records of inspections and tune-ups performed.
 - Natural gas usage of reheat furnace (ft³/month and ft³/year).
- g. i. Operational or Production Requirements
- A. Pursuant to Construction Permit #07080030, the Permittee shall not exceed and deviate from the following limits and requirements [T1]:
- The rated heat input capacity shall not exceed 95 mmBtu/hr.
 - Pipeline quality natural gas shall be the only fuel fired in the reheat furnace.
 - Annual natural gas usage shall not exceed 832 million scf.
- ii. Periodic Monitoring Compliance Method (Operational or Production Requirements)

- A. Pursuant to Construction Permit #07080030, compliance with annual limits shall be determined on a monthly basis from the sum of the data from the current month plus the preceding 11 months (running 12 month total).
- B. Pursuant to Construction Permit #07080030, the Permittee shall keep a file with burner(s) documentation, which at a minimum includes manufacturer's specifications for the capacity of the burner(s) and emission rates.
- C. Pursuant to Construction Permit #07080030, the Permittee shall keep the records of natural gas usage of reheat furnace (ft³/month and ft³/year).
- D. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep certification on the composition of the pipeline natural gas received, including it's sulfur content.

Non-Applicability Determinations

- a. i. The reheat furnace is not subject to 35 IAC 216.121, because this emission unit is not by definition a fuel combustion emission unit.
- b. ii. The reheat furnace is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because this emission unit does not use an add-on control device to achieve compliance with PM, SO₂, NO_x, CO and VOM emission limitations or standards.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included for the reheat furnace.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - Requirements in Conditions 4.1(2)(a)(i), (b)(i), (c)(i), (d)(i), (e)(i), (f)(i) and (g)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.2 Rolling Mills

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
3 Rolling Mills Lines	PM	1959	2005	None	None

2. Applicable Requirements

For the emission units in Condition 4.2(1) above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Periodic Monitoring Compliance Method (Opacity Requirements)

A. Pursuant to Section 39.5(7)(p) of the Act, The Permittee shall conduct semi-annual visible emissions observations of each line having individual stack(s) by using Method 22. If opacity is observed, the Permittee shall conduct opacity testing by using Method 9 within one week.

B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep records of visible emissions observations and opacity testing.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.321(c).

ii. Periodic Monitoring Compliance Method (PM Requirements)

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:

- A file containing the emission factors used by the Permittee to determine emissions of PM, with supporting documentation.
- Monthly and annual emissions of PM (tons/month and tons/year), with supporting calculations.
- Amount of steel processed (ton/mo and ton/yr)
- Records of the allowable PM emissions outlined by 35 IAC 212.321(c) based on the actual process weight rates of material processed by each unit.

3. Non-Applicability Determinations

- a. i. The rolling mills are not subject to 35 IAC 216.121, because these emission units are not by definition the fuel combustion emission units.
- b. ii. The rolling mills are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these emission units do not

use an add-on control device to achieve compliance with PM emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included for the rolling mills.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - Requirements in Conditions 4.2(2)(a)(i) and (b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.3 Coating Lines

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Coating Line #1	PM, VOM	1975	N/A	None	None
Coating Line #2	PM, VOM	1975	2009	None	None
Coating Line #3	PM, VOM	2001	N/A	None	None
Ovens Associated with Coating Lines ##1-3	PM, CO, SO ₂ , NO _x	1975, 2001	2009 (#2)	None	None

2. Applicable Requirements

For the emission unit in Condition 4.3(1) above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Periodic Monitoring Compliance Method (Opacity Requirements)

C. Pursuant to Section 39.5(7)(p) of the Act, The Permittee shall conduct semi-annual visible emissions observations of each coating line having individual stack(s) by using Method 22. If opacity is observed, the Permittee shall conduct opacity testing by using Method 9 within one week [Section 39.5(7)(p) of the Act].

D. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep records of visible emissions observations and opacity testing.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.321(c).

B. Pursuant to Construction Permit #07080030, the Permittee shall not exceed 0.02 ton/mo and 0.16 ton/yr of PM emissions associated with combustion of natural gas and established for curing oven operated with Coating Line #2 [T1].

ii. Periodic Monitoring Compliance Method (PM Requirements)

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:

- A file containing the emission factors used by the Permittee to determine emissions of PM, with supporting documentation.
- Monthly emissions of PM (tons/month), with supporting calculations.
- Natural gas usage of curing oven (ft³/month and ft³/year).

c. i. Sulfur Dioxide Requirements (SO₂)

- A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- ii. Periodic Monitoring Compliance Method (SO₂ Requirements)
- A. See Condition 4.3(2)(g)(i)(B) for pipeline quality natural gas.
- d. i. **Nitrogen Oxide Requirements (NO_x)**
- A. Pursuant to Construction Permit #07080030, the Permittee shall not exceed 0.2 ton/mo and 2.15 ton/yr of NO_x emissions associated with combustion of natural gas and established for curing oven operated with Coating Line #2 [T1].
- ii. Periodic Monitoring Compliance Method (NO_x Requirements)
- A. Pursuant to Construction Permit #07080030, compliance with annual limits shall be determined on a monthly basis from the sum of the data from the current month plus the preceding 11 months (running 12 month total).
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to NO_x emissions:
- A file containing the emission factors used by the Permittee to determine emissions of NO_x, with supporting documentation.
 - Records of monthly and annual emissions of NO_x (tons/month and tons/year), with supporting calculations.
 - Natural gas usage by curing oven operated with Coating Line #2 (ft³/month and ft³/year).
- e. i. **Volatile Organic Material Requirements (VOM)**
- A. Pursuant to 35 IAC 218.204(j)(2), the VOM content in extreme performance coatings applied to the miscellaneous metal parts shall not exceed the following limits:
- Air dried: 0.42 kg/l (3.5 lb/gal)
 - Baked: 0.40 kg/l (3.3 lb/gal)
- B. Pursuant to 35 IAC 218.204, the emission limitations from above are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition.
- C. Pursuant to Construction Permit #07080030, the Permittee shall not exceed the following limits of VOM emissions for Coating Line #2 [T1]: 0.9 ton/mo and 8.91 ton/yr.
- D. Pursuant to Construction Permit #07080030, the Permittee shall not exceed 0.01 ton/mo and 0.12 ton/yr of VOM emissions associated with combustion of natural gas and established for curing oven operated with Coating Line #2 [T1].
- E. Pursuant to Construction Permit #00100028, the Permittee shall not exceed the following revised limits of VOM emissions for Coating Line #3 [T1R]: 20.0 ton/mo and 151.0 ton/yr.
- ii. Periodic Monitoring Compliance Method (VOM Requirements)

- A. Pursuant to Construction Permits #07080030 and #00100028, compliance with annual limits shall be determined on a monthly basis from the sum of the data from the current month plus the preceding 11 months (running 12 month total).
- B. Pursuant to 35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act, testing for VOM content of coatings and cleanup solvents shall be performed as follows:
- On an annual basis, the VOM content of coatings "as applied" on the coating lines shall be determined according to Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
 - The VOM content of the cleaning solvents used on each coating line shall be tested annually according to Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a), 218.208, and 218.211(a).
 - This testing may be performed by the supplier of a material provided that the supplier provides documentation for such testing to the Permittee and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records:

Coating:

- The usage of each coating, in units of gallons/month and gallons/year.
- Density of each coating in units of lb/gallon.
- VOM content of each coating in weight percent.
- The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the affected coating operations.

Cleanup Solvents:

- VOM content of each cleanup solvent used in lbs/gal.
- Amount of each cleanup solvent used in gal/month and gal/year.

VOM Emissions:

- Total monthly and annual VOM emissions from all coating operations (ton/mo and ton/yr).
- Records of natural gas usage (scf/mo and scf/yr).
- Total monthly and annual VOM emissions from natural gas combustion in the ovens (lb/mo and ton/yr) with supporting documentation to justify how the VOM emissions were determined.

VOM Content Testing (wt.%):

- Identification of material tested;
- Results of analyses or supplier documentation;
- Documentation of analysis methodology; and
- Person performing analysis.

f. i. Carbon Monoxide Requirements (CO)

- B. Pursuant to Construction Permit #07080030, the Permittee shall not exceed 0.2 ton/mo and 1.80 ton/yr of CO emissions associated with combustion of natural gas and established for curing oven operated with Coating Line #2 [T1].

ii. Periodic Monitoring Compliance Method (CO Requirements)

- A. Pursuant to Construction Permit #07080030, compliance with annual limits shall be determined on a monthly basis from the sum of the data from the current month plus the preceding 11 months (running 12 month total).
- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to CO emissions:
 - A file containing the emission factors used by the Permittee to determine emissions of CO, with supporting documentation.
 - Monthly and annual emissions of CO (tons/month and tons/year), with supporting calculations.
 - Natural gas usage of curing oven (ft³/month and ft³/year).

g. i. Operational or Production Requirements

- A. Pursuant to Construction Permit #07080030, the Permittee shall not exceed the following limits and requirements [T1]:
 - Total VOM usage of paint and clean-up solvents on Coating Line #2 shall not exceed 17,820 lb/yr.
- B. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the curing ovens associated with the coating lines.

ii. Periodic Monitoring Compliance Method (Operational or Production Requirements)

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to VOM usage on Coating Line #2:
 - Records of total monthly and annual VOM usage of paint and clean-up solvents on Coating Line #2 (tons/month and tons/year).
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the records that the natural gas used is a pipeline quality natural gas with a sulfur content less than 2,000 ppm.

3. Non-Applicability Determinations

a. **40 CFR 64, Compliance Assurance Monitoring (CAM)**

Coating lines and associated curing ovens are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these emission units do not use an add-on control device to achieve compliance with PM, SO₂, NO_x, CO and VOM emission limitations or standards.

b. **40 CFR Part 63, Subpart M**

Pursuant to Condition 3.4(a), this source is not considered a major source of HAP emissions.

c. The curing ovens are not subject to 35 IAC 216.121, because these emission units are not by definition the fuel combustion emission units.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included for the coating lines.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - Requirements in Conditions 4.3(2)(a)(i), (b)(i), (c)(i), (d)(i), (e)(i), (f)(i) and (g)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.4 Rustproofing Operations

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Rustproofing Operations	PM, VOM	N/A	N/A	None	None

2. Applicable Requirements

For the emission unit in Condition 4.4(1) above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Periodic Monitoring Compliance Method (Opacity Requirements)

A. Pursuant to Section 39.5(7)(p) of the Act, The Permittee shall conduct semi-annual visible emissions observations of all points where rustproofing is conducted at the source by using Method 22. If opacity is observed, the Permittee shall conduct opacity testing by using Method 9 within one week [Section 39.5(7)(p) of the Act].

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of visible emissions observations and opacity testing.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.321(c).

ii. Periodic Monitoring Compliance Method (PM Requirements)

A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall keep the following records related to PM emissions:

- Written procedures for application of rusproofing inhibitors at the source.
- Semi-annual inspections of how the procedures for minimizing overspray of rustproofing inhibitors are followed.
- Monthly and annual records of solids in each rustproofing material applied.
- Records of the allowable PM emissions outlined by 35 IAC 212.321(c) based on the actual process weight rates of solids being processed.

c. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.204(j)(2), the VOM content in rust inhibitors is classified as extreme performance coatings (air dried) applied to the miscellaneous metal parts and shall not exceed 0.42 kg/l (3.5 lb/gal). This emission limitation is expressed in units of VOM per volume of coating

(minus water and any compounds which are specifically exempted from the definition of VOM) as applied, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition.

- B. Pursuant to construction permit #07080030, the Permittee shall not exceed the following emission limits from rustproofing operations [T1]:

VOM Emissions, ton/mo	VOM Emissions, ton/yr
2.1	18.41

ii. Periodic Monitoring Compliance Method (VOM Requirements)

- A. Pursuant to 35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act, testing for VOM content of coatings (rust inhibitors) shall be performed as follows:

- On an annual basis, the VOM content of coatings "as applied" shall be determined according to Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
- This testing may be performed by the supplier of a material provided that the supplier provides documentation for such testing to the Permittee and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent.

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records:

Coating:

- The usage of each rust inhibitor, in units of gallons/month and gallons/year.
- Density of each rust inhibitor in units of lb/gallon.
- VOM content of each rust inhibitor in weight percent.
- The weight of VOM per volume of each rust inhibitor (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the rustproofing operations.

VOM Emissions:

- Total monthly and annual VOM emissions from all rustproofing operations (ton/mo and ton/yr).
- Compliance with annual limits of Conditions 4.4(3)(c)(i) shall be determined from a running total of 12 months of data.

VOM Content Testing (wt.%):

- Identification of material tested;
- Results of analyses or supplier documentation;
- Documentation of analysis methodology; and
- Person performing analysis.

d. i. Operational or Production Requirements

- A. Pursuant to Construction Permit #07080030, the Permittee shall not exceed the following production and emission limits while applying rust inhibitors at various points at the plant [T1]:

- Use of VOM in rust inhibitors shall not exceed 36,820 lb/yr.

- ii. Periodic Monitoring Compliance Method (Operational or Production Requirements)
 - A. Pursuant to Section 39.5(7)(b), the Permittee shall keep monthly and annual records of VOM content (lb/mo and lb/yr) in rust inhibitors applied at the rustproofing operations.
 - B. Pursuant to Section 39.5(7)(b), compliance with annual limits shall be determined from a running total of 12 months of data.

3. Non-Applicability Determinations

a. 40 CFR 64, Compliance Assurance Monitoring (CAM)

The rustproofing operations do not use an add-on control device to achieve compliance with PM and VOM emission limitations or standards.

b. 35 IAC Part 218 Subpart G: Use of Organic Material

35 IAC 218.209 exempts miscellaneous metal parts coating operations subject to 35 IAC 218.204 from applicability of 35 IAC 218.301 and 218.302.

c. 40 CFR Part 63, Subpart M

Pursuant to Condition 3.4(a), this source is not considered a major source of HAP emissions.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included for rustproofing operations.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - Requirements in Conditions 4.4(2)(a)(i),(b)(i),(c)(i) and (d)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.5 Equipment Lubrication

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Equipment Lubrication	PM, VOM	N/A	N/A	None	None

2. Applicable Requirements

For the emission unit in Condition 4.5(1) above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Periodic Monitoring Compliance Method (Opacity Requirements)

A. Pursuant to Section 39.5(7)(p) of the Act, The Permittee shall conduct semi-annual visible emissions observations of all points where equipment lubrication is conducted at the source by using Method 22. If opacity is observed, the Permittee shall conduct opacity testing by using Method 9 within one week [Section 39.5(7)(p) of the Act].

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of visible emissions observations and opacity testing.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.321(c).

ii. Periodic Monitoring Compliance Method (PM Requirements)

A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall keep the following records related to PM emissions:

- Written procedures for performance of equipment lubrication at the source.
- Semi-annual inspections of how the procedures for minimizing overspray of lubricants are followed.
- Monthly and annual records of solids in each lubricant applied.
- Records of the allowable PM emissions outlined by 35 IAC 212.321(c) based on the actual process weight rates of solids being processed.

c. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from a unit using organic material except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists

the limitation of 35 IAC 215 Subpart G shall only apply to photochemically reactive material.

- B. Pursuant to construction permit #07080030, the Permittee shall not exceed the following revised emission limits from equipment lubrication [T1R]:

Lubricants	VOM Emissions, t/mo	VOM Emissions, t/yr
Solvent-based and Water-based	2.6	11.09

ii. Periodic Monitoring Compliance Method (VOM Requirements)

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records for lubricants:

- The usage of each type of lubricant (solvent-based and water-based), in units of gallons/month and gallons/year.
- Density of each type of lubricant in units of lb/gallon.
- VOM content of each type of lubricant in weight percent.
- Composition of lubricants and its photochemical reactivity.
- Total monthly and annual VOM emissions from all lubricants applied (ton/mo and ton/yr).
- Total hours of equipment operations when solvent-based lubricants are applied (hr/mo and hr/yr).
- Actual hourly VOM emissions when solvent based lubricants are applied (lb/hr).
- Compliance with annual limits of Conditions 4.5(3)(c)(i)(B) shall be determined from a running total of 12 months of data.

d. i. Operational or Production Requirements

- A. Pursuant to Construction Permit #07080030, the Permittee shall not exceed the following production limit while applying solvent-based lubricant [T1]:

- Use of VOM in solvent-based lubricants shall not exceed 21,336 lb/yr.

ii. Periodic Monitoring Compliance Method (Operational or Production Requirements)

- A. Pursuant to Section 39.5(7)(b), the Permittee shall keep monthly and annual records of VOM content (lb/mo and lb/yr) in the solvent-based lubricants applied.
- B. Pursuant to Section 39.5(7)(b), compliance with annual limits shall be determined from a running total of 12 months of data.

3 Non-Applicability Determinations

a. **40 CFR 64, Compliance Assurance Monitoring (CAM)**

The equipment lubrication does not use an add-on control device to achieve compliance with PM and VOM emission limitations or standards.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included for equipment lubrication.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - Requirements in Conditions 4.5(2)(a)(i),(b)(i),(c)(i) and (d)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

Section 5 - Title I Requirements

This Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.

Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

Pursuant to 35 IAC 201.146, this condition is reserved for insignificant activities obligated to comply with Sections 9.1(d) and Section 39.5 of the Act; Sections 165, 173, and 502 of the Clean Air Act; or any other applicable permit or registration requirements. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any Insignificant Activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities:

Insignificant Activity	Number of Units	Insignificant Activity Category
N/A	N/A	N/A
Straightening Machines	6	35 IAC 201.210(a)(2) or (a)(3)
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).		35 IAC 201.210(a)(4)

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- Pursuant to 35 IAC 212.321 or 212.322, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.

5. Periodic Monitoring Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items:

- List of all insignificant activities, including insignificant activities added as specified in Condition 5.6, the categories the insignificant activities fall under, and supporting calculations as needed.
- Potential to emit emission calculations before any air pollution control device for each insignificant activity.

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. A construction permit is not required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):
 - A. A description of the emission unit including the function and expected operating schedule of the unit.
 - B. A description of any air pollution control equipment or control measures associated with the emission unit.
 - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
 - D. The means by which emissions were determined or estimated.
 - E. The estimated number of such emission units at the source.
 - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. A construction permit is not required. Addresses are included in Attachment 3.
- iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 7(j) of the Act (see Condition 2.7) shall not apply to any change made in Condition 6.6(a) above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit. A construction permit is not required.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required. A construction permit is not required.

Section 7 - Other Requirements

1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
 - i. The name and identification of the emission unit(s) being tested.
 - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
 - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - iv. 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 emission unit and any control equipment will be determined.
 - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
 - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:
 - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
 - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.

- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:
- i. General information including emission unit(s) tested.
 - ii. A summary of results.
 - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
 - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - v. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vii. An explanation of any discrepancies among individual tests or anomalous data.
 - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
 - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
 - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. Emissions Reduction Market System (ERMS) Requirements

- a. Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS.
- b. Obligation to Hold Allotment Trading Units (ATUs)
- i. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 7.2(g), as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 7.2(d):
 - A. VOM emissions from insignificant emission units and activities as identified in Section 6 of this permit, in accordance with 35 IAC 205.220.
 - B. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 4 of this permit, in accordance with 35 IAC 205.225.

- C. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).
 - D. Excess VOM emissions that are a consequence of an emergency as approved by the IEPA, pursuant to 35 IAC 205.750.
 - E. VOM emissions from certain new and modified emission units as addressed by Condition 7.2(g)(ii), if applicable, in accordance with 35 IAC 205.320(f).
- ii. In accordance with 35 IAC 205.150(c)(2), notwithstanding the Condition 7.2(b)(i) above, if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 4 of this permit.

c. Market Transactions

- i. As specified in 35 IAC 205.610(a), the source shall apply to the IEPA for and obtain authorization for a Transaction Account prior to conducting any market transactions.
- ii. Pursuant to 35 IAC 205.610(b), the Permittee shall promptly submit to the IEPA any revisions to the information submitted for its Transaction Account.
- iii. Pursuant to 35 IAC 205.620(a), the source shall have at least one account officer designated for its Transaction Account.
- iv. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the IEPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the IEPA for entry into the Transaction Account database.

d. Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 7.2(b), it shall provide emissions excursion compensation in accordance with the following:

- i. Upon receipt of an Excursion Compensation Notice issued by the IEPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - A. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - B. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- ii. If requested in accordance with paragraph 7.2(d)(iii) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the IEPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- iii. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the IEPA, rather than purchased from the ACMA.

e. Quantification of Seasonal VOM Emissions

- i. Pursuant to 35 IAC 205.315(b), the methods and procedures specified in Sections 3 and 4 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions:

No exceptions

- ii. In accordance with 35 IAC 205.750, the Permittee shall report emergency conditions at the source to the IEPA if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:

- A. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency.
- B. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

f. Annual Account Reporting

- i. Pursuant to 35 IAC 205.300, for each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the IEPA for the seasonal allotment period. This report shall include the following information:

- A. Actual seasonal emissions of VOM from the source.
- B. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations.
- C. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337.
- D. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the IEPA.
- E. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).
- F. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- ii. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

g. Allotment of ATUs to the Source

- i. A. The allotment of ATUs to this source is 722 ATUs per seasonal allotment period.
- B. This allotment of ATUs reflects the IEPA's determination that the source's baseline emissions were 81.9494 tons per season.

- C. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 7.2(i) of this permit.
 - D. ATUs will be issued to the source's Transaction Account by the IEPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
- ii. Contingent Allotments for New or Modified Emission Units

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

Emission Unit	Construction Permit No.	Date Issued
Coating Line #3	00100028	1/17/01
Curing Oven for New Coating Line #2	07080030	4/10/09
New Coating Lin #2	07080030	4/10/09
Rust Inhibitors Application	07080030	4/10/09
Equipment Lubrication	07080030	4/10/09

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

- iii. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - A. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630.
 - B. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720.
 - C. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

h. Recordkeeping for ERMS

Pursuant to 35 IAC 205.700(a), the Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS:

- i. Seasonal component of the Annual Emissions Report.
- ii. Information on actual VOM emissions, as specified in detail in Sections 3 and 4 of this permit and Condition 7.2(e)(i).
- iii. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

i. Exclusions from Further Reductions

- i. A. Pursuant to 35 IAC 205.405(a), VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following:
 - I. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA.
 - II. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines.

III. An emission unit for which a LAER demonstration has been approved by the IEPA on or after November 15, 1990.

- B. Pursuant to 35 IAC 205.405(a) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above:

None

- ii. A. Pursuant to 35 IAC 205.405(b), VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT.

- B. Pursuant to 35 IAC 205.405(b) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above:

None

Section 8 - State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, 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. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

Pollutant		Tons/Year
Volatile Organic Material	(VOM)	308.7
Sulfur Dioxide	(SO ₂)	0.30
Particulate Matter	(PM)	6.4
Nitrogen Oxides	(NO _x)	60.0
HAP, not included in VOM or PM	(HAP)	---
Total		375.4

2. VOM RACT Requirements

a. Pursuant to 35 IAC 218.204(j), on and after May 1, 2012, the limitations in 35 IAC 218.204(q) shall apply to the category of miscellaneous metal parts coating.

i. Pursuant to 35 IAC 218.204(q)(1)(G), the Permittee shall not apply coatings by exceeding the following limits of each applied coating:

Coating	Kg/l* (lb/gal)* coatings	Kg/l (lb/gal) solids
Extreme Performance Coating (Air dried)	0.42 (3.5)	0.80 (6.67)
Extreme Performance Coating (Baked)	0.36 (3.0)	0.61 (5.06)

* The emission limitations from above are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition.

ii. Pursuant to 35 IAC 218.211(c)(1), by May 1, 2012, the Permittee shall certify to the Illinois EPA that coating operations are in compliance with applicable requirements of 35 IAC 218.204(q).

iii. Pursuant to 35 IAC 218.211(c)(2), starting May 1, 2012, the Permittee shall fulfill recordkeeping requirements for addressing compliance with appropriate limitations of 35 IAC 218.204(q).

b. Pursuant to 35 IAC 218.204(q)(2), on or after May 1, 2012, miscellaneous plastic parts and products coating operations will be subject to the newly established emission limits. Pursuant to 35 IAC 218.211(c)(1), by May 1, 2012, the Permittee shall certify to the Illinois EPA that coating operations are in compliance with applicable requirements of 35 IAC 218.204(q)(2) and pursuant to 35 IAC 218.211(c)(2), starting May 1, 2012, the Permittee shall fulfill recordkeeping requirements for addressing compliance with appropriate limitations of 35 IAC 218.204(q)(2).

Attachment 1 - List of Emission Units at This Source

Section	Emission Units	Description
4.1	Reheat Furnace	Steel rails and billets are heated in a 95.0 mmBtu/hr natural gas-fired reheat furnace equipped with ultra-low NO _x burners
4.2	Rolling Mills (3 units)	The heated steel rails are rolled, along with the billets, into posts and merchant products
4.3	Coating Lines #1, #2 and #3	Coating of signpost and merchant steel items
4.4	Rustproofing Operations	Rust inhibitor treatment is applied prior to storage of unpaid products.
4.5	Equipment and Machining Lubrication	The lubricants increase wear life of the tooling

Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
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
BACT	Best Available Control Technology
BAT	Best Available Technology
BTU	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO ₂	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EAF	Electric arc furnace
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
HP	Horsepower
hr	Hour
H ₂ S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
KW	Kilowatts
LAER	Lowest Achievable Emission Rate
lb	Pound
m	Meter
MACT	Maximum Achievable Control Technology

mm	Million
mon	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
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
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation 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
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

Attachment 3 - Contact and Reporting Addresses

<p style="text-align: center;">IEPA Compliance Section</p> <p style="text-align: center;">IEPA Stack Test Specialist</p> <p style="text-align: center;">IEPA Air Quality Planning Section</p> <p style="text-align: center;">IEPA Air Regional Field Operations Regional Office #1</p> <p style="text-align: center;">IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, IL 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, IL 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, IL 62794-9506</p> <p>Phone No.: 217/782-2113</p>
<p style="text-align: center;">USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, IL 60604</p> <p>Phone No.: 312/353-2000</p>

Attachment 4 - Example Certification by a Responsible Official

SIGNATURE BLOCK	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
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. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE