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1.0 SOURCE IDENTIFICATION

1.1 Source

Cerro Copper Products Co.
3000 Mississippi Avenue
Sauget, Illinois 62206
618/337-6000

I.D. No.: 163121AAM
Standard Industrial Classification: 3351, Rolling, Drawing and
Extruding of Copper

1.2 Owner/Parent Company

Cerro Copper Products Co.
P.O. Box 66800
St. Louis, Missouri 63166-6800

1.3 Operator

Cerro Copper Products Co.
P.O. Box 66800
St. Louis, Missouri 63166-6800

Joseph Grana, Manager of Environmental, Energy and Health Services
618/337-6000

1.4 General Source Description

Cerro Copper Products Company (Cerro) is located in Sauget, St. Clair County. The plant produces copper anodes, billets, and tubing. Major processes used include fire refining, melting, and extrusion.

Cerro purchases No. 2 grade scrap, No. 1 grade scrap, blister copper, copper cathodes, and copper billets as raw material for its fire refining anode process, which occurs in the No. 3 and No. 4 Anode Reverberatory Furnaces. In these furnaces the copper content of the metal is increased to approximately 99% by removing impurities. By blowing oxygen into the metal bath, impurities are oxidized and float to the top of the bath where they are removed as slag. The copper oxide left in the bath is reduced back to metallic copper, and the molten metal is removed "tapped" from the furnaces and cast into copper anodes, which are sold.

Internal copper scrap, blister copper, and copper cathodes are purchased and fire refined in the reverberatory Billet furnace in a similar process to the Anode Furnaces. There is also a Shaft furnace that melts only cathodes and internal scrap copper. The molten copper is transferred and held in the Skim and Hold furnaces prior to being cast. The molten copper is then cast into copper logs, which are then cut into shorter copper billets. These billets are either sold or sent to the tube mill.

The billets are used in either the extrusion press for small diameter tubing or the piercing mill for large diameter tubes. In either case, the copper billets are heated and then pierced or extruded to form a thick wall tube. This thick wall tube is then sent through either a set of draw benches or draw blocks to bring the tubing to its desired wall thickness and diameter. The tubing then passes through any number of processes, any of which can be bypassed. These processes include conveyerized degreasing, coiling, straightening, annealing, marking with solvent based ink/paint, cutting, shearing, cleaning in cold solvent degreaser, packaging, and shipping.

Administration, engineering, quality assurance testing, maintenance, raw and waste material handling activities are all present at the facility to support the production of Cerro's products.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
ACMA	Alternative Compliance Market Account
ATUs	Allotment Trading Units
BAT	Best Available Technology
Btu	British thermal unit
⁰ C	Degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
Cm	Centimeter
ERMS	Emission Reduction Market System
⁰ F	Degrees Fahrenheit
Ft ²	Feet square
ft ³	Cubic foot
gal	Gallon
Gm	Gram
HAP	Hazardous Air Pollutant
Hp	Horse power
hr	Hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
In	Inch
⁰ K	degrees Kelvin
Kg	kilo gram
KW	Kilowatts
kpa	Kilopascals
lb	Pound
MACT	Maximum Available Control Technology
mmcf	Million cubic feet
MG	Mega Gram
M	Meter
mmBtu	Million British thermal units
mmHg	Millimeters of mercury
mo	Month
MW	Mega Watts
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
OM	Organic Material
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods

ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	Pounds per square inch absolute
RMP	Risk Management Plan
scf	Standard cubic foot
SO ₂	Sulfur Dioxide
T	Ton
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
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
wt.	Weight
yr	Year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

- 2 Charcoal Burning
- 1 Material Handling - Copper
- 1 Material Handling - Slag
- 1 Material Handling -Waste refractory
- 1. Material Handling - Al₂SiO₄
- 1 Box Shop

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

- 1 BaSO₄ Spraying
- 1 Spray Cooling
- 1 Dip Tank
- 1 Al₂SiO₄ Plug Pouring
- 1 Billet Saw
- 1 Bosh Tank
- 1 Pickle Tank
- 18 Tube Cutting
- 1 Material Handling - Sand
- 1 Material Handling - Logs
- 1 Material Handling - Limestone
- 1 Material Handling - Graphite

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

Number of Activities	Activity Description	35 IAC Regulatory Citation
18	Preheaters (Natural Gas 0.25 to 0.6 mmBtu/hr)	201.210(a)(4)
35	Laundry Burners (Natural Gas 0.25 to 0.6 mmBtu/hr)	201.210(a)(4)
161	Space heaters (Natural Gas 0.03 to 0.5 mmBtu/hr)	201.210(a)(4)
1	Tool Furnace (Natural Gas 0.5 mmBtu/hr)	201.210(a)(4)
1	Building 80 Degreaser Steam Generator (Natural Gas 2.09 mmBtu/hr)	201.210(a)(4)

Number of Activities	Activity Description	35 IAC Regulatory Citation
1	Material Handling - BaSO ₄	201.210(a)(4)
1	Extrusion Press	201.210(a)(5)
12	Drawing Blocks	201.210(a)(5)
1	Piercing Mill	201.210(a)(5)
1	Mineral Spirit Tank	201.210(a)(10)
2	Soluble Oil Tanks	201.210(a)(11)
3	Drawing Oil Tanks	201.210(a)(11)
4	Hydraulic Oil Tanks	201.210(a)(11)
3	Fuel Oil Tanks	201.210(a)(11)
2	Kerosene Tanks	201.210(a)(11)
1	Used Oil Tank	201.210(a)(11)
1	Contaminated Oil Tank	201.210(a)(11)
1	Spray Paint Marking	201.210(a)(13)
9	Tube Marking	201.210(a)(14)
1	100KW Anode Natural Gas Generator	201.210(a)(15)
1	150KW Office Natural Gas Generator	201.210(a)(15)
3	Caustic Tanks	201.210(a)(18)
1	Material Handling - Al ₂ SiO ₄	201.210(a)(4)
1	Material Handling - BaSO ₄	201.210(a)(4)

3.1.4 The Permittee has activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

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

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

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

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that

organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Emission Control Equipment
01	Anode Furnace #3 (Maximum Firing 72 mmBtu/hr)	Anode #3 Air Pollution Control System
	Anode Furnace #4 (Maximum Firing 72 mmBtu/hr)	Anode #4 Air Pollution Control System
	Billet Furnace (Maximum Firing 72 mmBtu/hr)	Billet Furnace Air Pollution Control System
02	Shaft Furnace (Maximum Firing 52 mmBtu/hr)	---
	Skim Furnace (Maximum Firing 3 mmBtu/hr)	---
	Holding Furnace (Maximum Firing 7.6 mmBtu/hr)	---
	Piercing Mill Furnace #2 (Maximum Firing 15.6 mmBtu/hr)	---
	Billet Heating Furnace #1 (Maximum Firing 14.2 mmBtu/hr)	---
	Billet Heating Furnace #2 (Maximum Firing 14.0 mmBtu/hr)	---
	Bright Annealing Furnace #1 (Maximum Firing 10.8 mmBtu/hr)	---
	Bright Annealing Furnace #2 (Maximum Firing 3.28 mmBtu/hr)	---
	Bright Annealing Furnace #3 (Maximum Firing 3.28 mmBtu/hr)	---
	Anode Cooling Tower	---
	Billet Cooling Tower	---
03	Detrex Degreaser Model #2D-CC-SPL	Freeboard Refrigeration Device
04	Conveyorized Degreasing	Work procedures & Equipment design
05	Building 80 Solvent Tank 4500 Gallons	Submerged Loading
06	Gasoline Storage Tank 1000 Gallons	Submerged Loading
07	Fugitive Emissions	---

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 Applicable Regulations

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

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

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

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Fugitive Particulate Matter Operating Program

- a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.2.4 Ozone Depleting Substances

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

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

5.2.5 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.6 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the

owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

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

5.2.7 Episode Action Plan

- a. The source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to Illinois EPA, Compliance Section.

5.2.8 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or

modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	253.00
Sulfur Dioxide (SO ₂)	13.00
Particulate Matter (PM)	356.00
Nitrogen Oxides (NO _x)	165.00
HAP, not included in VOM or PM	----
Total	787.00

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources

Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.5 Records for Operating Scenarios

N/A

5.6.6 Retention and Availability of Records

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01: Refining Furnaces

7.1.1 Description

Cerro has several intermediate steps in the production process. The first step is the fire refining of #2 grade copper into anodes in the anode furnaces. Cathodes and internal tube scrap is melted and cast into solid cylinders of copper, called billets, in the billet furnace.

7.1.2 List of Emission Units and Pollution Control Equipment

Description*	Emission Control Equipment	Date Furnace Constructed
Anode Furnace #3 (Maximum Firing 72 mmBtu/hr)	Anode #3 Air Pollution Control System Includes #3 Afterburner, Waste Heat Boiler, #3 Quencher, Scrubber and Demister	Prior to 1972
Anode Furnace #4 (Maximum Firing 72 mmBtu/hr)	Anode #4 Air Pollution Control System Includes #4 Afterburner, #4 Quencher, Scrubber and Demister	Prior to 1972
Billet Furnace (Maximum Firing 72 mmBtu/hr)	Billet Furnace Air Pollution Control System Includes Afterburner, Quencher, Scrubber and Demister	Prior to 1972

* Primarily fired with pipeline grade natural gas. #2 fuel oil used as a back-up fuel.

7.1.3 Applicability Provisions and Applicable Regulations

a. An "affected furnace" for the purpose of these unit-specific conditions is an emission unit described in conditions 7.1.1 and 7.1.2.

b. The affected furnace is subject to 35 IAC 212.322(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 2) [35 IAC 212.322(a)].

c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from an affected process emission source,

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

d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].

e. Malfunction and Breakdown Provisions

In the event of a malfunction or breakdown of a furnace, the Permittee is authorized to continue operation of the furnace in violation of the applicable requirement of 35 IAC 212.322, as necessary to prevent risk of injury to personnel or severe damage to equipment. This authorization is subject to the following requirements:

i. The Permittee shall repair the damaged feature(s) of the air pollution control system's fan and/or control or remove the furnace from service as soon as practicable. This shall be accomplished within 24-hours.

ii. The Permittee shall fulfill the applicable recordkeeping and reporting requirements of Conditions 7.1.9(b) and 7.1.10(a).

f. Startup Provisions

The Permittee is authorized to operate an affected furnace in violation of the applicable limit of 35 IAC 212.322 during startup pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups. This authorization is subject to the following:

i. This authorization only extends for a period of up to 6 days following initial firing of fuel during each startup event. A startup event is completed once the gas stream is being treated by the air pollution control devices associated with the affected furnace in accordance with permit Condition 7.1.5.

ii. The Permittee shall take the following measures to minimize startup emissions, the duration of startups, and minimize the frequency of startups:

A. Implementation of established startup procedures; and

B. Use of prefire castable materials in the furnace, where practicable.

iii. The Permittee shall fulfill the applicable recordkeeping requirements of Condition 7.1.9(a).

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected furnace is not subject to 35 IAC 217.121 for emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected process emission source is not by definition a fuel combustion emission unit.
- b. The affected furnace is not subject to 35 IAC 216.121, emissions of Carbon Monoxide from fuel combustion emission units, because affected process emission source is not by definition a fuel combustion emission unit.

7.1.5 Operational and Production Limits and Work Practices

- a. Only Anode #3 or Anode #4 furnace shall be operating at any one time. Simultaneous operation is allowed when one of the furnaces is in preheating mode.
- b. The differential pressure drop across the Venturi scrubber of the Anode air pollution control system shall be maintained at a nominal 40 inches of water.
- c. The variable throat quencher of the Anode #4 air pollution control system will remain in the open position during charging. At least two quencher fogging nozzles using fresh water makeup shall be activated during the charging, polling and blowing portions of the cycle.
- d. The draft on the Billet furnace shall be increased during the charging, polling and blowing portions of the cycle, to keep all doors closed as tightly as possible to reduce fugitive emissions.
- e. The differential pressure drop across the Venturi scrubber of the Billet furnace air pollution control system shall be maintained at a nominal 35 inches of water.
- f. The charge doors of the furnace will be kept closed when their use is not necessary, to reduce the discharge of uncontrolled emissions.

7.1.6 Emission Limitations

In addition to Conditions 5.2 2, 7.1.3 and the source-wide emission limitations in Condition 5.5, the sources listed below are subject to the following:

None

7.1.7 Testing Requirements

Testing requirements are in the standard conditions of Section 8.

7.1.8 Monitoring Requirements

The Permittee shall monitor the pressure drop across the Venturi scrubber, scrubber water flow, and quencher water flow.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the items required by Condition 7.1.8 for the affected furnace to demonstrate compliance with emission limits of the Conditions 5.5.1 and 7.1.3 pursuant to Section 39.5(7)(b) of the Act.

a. Records for Startup

Startup means the setting in operation of an emission unit. For this unit, startup is the time periods when fuel is fired in the furnace and the air pollution control device is not fully functioning in accordance with permit Condition 7.1.5. Once the air pollution control device is operating normally as required by permit Condition 7.1.5 the startup has concluded.

The Permittee shall maintain the following records, pursuant to Section 39.5(7)(b) of the Act, for each affected furnace subject to Condition 7.1.3(f), which at a minimum shall include:

- i. The following information for each startup of affected furnace:
 - A. Date and duration of the startup, i.e., start time and time normal operation achieved;
 - B. A detailed description of the startup, whether prefire castable materials were used in the furnace to minimize the duration of the startup; and
 - C. Whether exceedance of Condition 5.2.2 may have occurred during startup, with explanation and estimated duration (minutes).

b. Records for Malfunctions and Breakdowns of an affected furnace

The Permittee shall maintain records, pursuant to 35 IAC 201.263, of continued operation of an affected furnace subject to 35 IAC 212.322 during malfunctions

and breakdown of the control features of the affected furnace, which as a minimum, shall include:

- i. Date and duration of malfunction or breakdown;
 - ii. A detailed explanation of the malfunction or breakdown;
 - iii. An explanation why the damaged feature(s) could not be immediately repaired;
 - iv. The measures used to reduce the quantity of emissions and the duration of the event;
 - v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity; and
 - vi. The amount of release above allowable emissions during malfunction/breakdown.
- c. A maintenance and repair log for each furnace, listing each activity performed with date.

7.1.10 Reporting Requirements

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

- a. If there is a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report within 30 days after the deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the deviation and efforts to reduce emissions and future occurrences.
- b. Reporting of Malfunctions and Breakdowns for the affected furnace:

The Permittee shall provide the following notification and reports to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to 35 IAC 201.263, concerning continued operation of an affected furnace subject to Condition 7.1.3(e) during malfunction or breakdown of the control features of the furnace.

- i. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence

of noncompliance due to malfunction or breakdown.

- ii. Upon achievement of compliance, the Permittee shall give a written follow-up notice to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed or when the furnace was taken out of service.
- iii. If compliance is not achieved within 5 working days of the occurrence, the Permittee shall submit interim status reports to the Illinois EPA, Compliance Section and Regional Field Office, within 5 days of the occurrence and every 14 days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete or the affected furnace will be taken out of service.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.1.12 Compliance Procedures

- a. Compliance with the opacity limitations of Condition 5.2.2(b), the Permittee shall conduct a qualitative visible emissions observation once each day when operating to observe for the presence of abnormal visible emissions. If such observations during operation do not detect observable emissions for a period of two weeks, the frequency of observations shall be reduced to once per week when operating. If the weekly observations do not detect observable emissions for a period of two months, the frequency of observations shall be reduced to once per month when operating. If abnormal visible emissions are detected the frequency of observations shall be increased to once a day. Observations thereafter may be reduced again if visible emissions are not detected for the period outlined above.

If abnormal visible emissions are observed, the Permittee shall initiate corrective actions to eliminate the abnormal visible emissions. If the Permittee cannot eliminate the abnormal visible emissions within 24 hours, the Permittee shall

conduct a Method 9 test within three days after the qualitative observation showing abnormal emissions.

- b. Compliance with the emission limits in Condition 5.5.1 and 7.1.3 from each affected furnace shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

- i. Gaseous Emissions:

Gaseous emissions generated by the furnace burner are not controlled by the air pollution control system, even though they pass through the control system.

Natural Gas:

Pollutant	Emission Factor (lbs/10 ⁶ scf)
NO _x	100
VOM	5.5
SO ₂	0.6

The emission factors for natural gas fired units are from Tables 1.4-1 and 1.4-2, AP-42 Fifth Edition, Volume 1, Supplement D, July, 1998.

Emissions (ton/yr) = (natural gas usage, mmcf/yr) x (the applicable emission factor, lb/mmcf) x (ton/2000 lb)

#2 Oil:

Pollutant	Emission Factor (lbs/1,000 gal)
NO _x	20
VOM	0.34
SO ₂	0.7

The emission factors for #2 oil fired units are from Tables 1.3-1 and 1.3-3, AP-42 Fifth Edition, Volume 1, Supplement D, March, 1998.

Emissions (ton/yr) = (oil usage, gal/yr) x (the applicable emission factor, lb/1000 gal) x (ton/2000 lb)

- ii. PM Emissions:

Anode Furnace #3		
Operation Mode	Controlled PM Emission lb/hr	
	Typical	Maximum
Charging	8.2	10.0
Melting	6.8	9.2
Oxidation	8.7	13.8
Reduction	6.3	12.4
Tapping	4.9	7.7
Start-Up	1.1	31.2
Malfunction	28.9	57.3

Anode Furnace #4		
Operation Mode	Controlled PM Emission lb/hr	
	Typical	Maximum
Charging	8.7	11.8
Melting	6.9	9.2
Oxidation	8.7	13.8
Reduction	6.3	12.4
Tapping	6.1	13.4
Start-Up	1.1	36.9
Malfunction	31.2	57.3

Billet Furnace		
Operation Mode	Controlled PM Emission lb/hr	
	Typical	Maximum
Charging	6.8	11.5
Melting	7.1	7.1
Oxidation	5.4	5.6
Reduction	14.3	15.9
Tapping	4.3	9.7
Start-Up	1.1	36.0
Malfunction	27.6	66.4

The emission rates are derived from stack test results provided in the permit application.

7.2 Unit 02: Process Emission Sources

7.2.1 Description

Anode Cooling Tower:

Contact cooling water is circulated from Anode furnaces and casting operations to cooling tower.

Shaft Furnace:

High grade scrap copper is melted for casting into logs.

Skim Furnace:

Oxidized metal is removed (skimmed) from this furnace.

Holding Furnace:

The furnace is used for short term holding of molten copper when previously cast billets are being removed from the molds.

Billet Cooling Tower:

Contact cooling water is circulated from Billet furnace and casting operations to cooling tower.

Piercing Mill Furnace #2:

Copper billets are heated for piercing.

Billet Heating Furnaces:

Copper billets are heated for extrusion.

Bright Annealing Furnaces:

The furnaces are used for heat treating copper tubing to obtain desirable physical characteristics in an inert atmosphere.

7.2.2 List of Emission Units and Pollution Control Equipment

Description	Date Constructed
Shaft Furnace (Maximum Firing 52 mmBtu/hr)	Prior to 1972
Skim Furnace (Maximum Firing 3 mmBtu/hr)	Prior to 1972
Holding Furnace (Maximum Firing 7.6 mmBtu/hr)	Prior to 1972
Piercing Mill Furnace #2 (Maximum Firing 15.6 mmBtu/hr)	Prior to 1972

Description	Date Constructed
Billet Heating Furnace #1 (Maximum Firing 14.2 mmBtu/hr)	1992
Billet Heating Furnace #2 (Maximum Firing 14.0 mmBtu/hr)	Prior to 1972
Bright Annealing Furnace #1 (Maximum Firing 10.8 mmBtu/hr)	Prior to 1972
Bright Annealing Furnace #2 (Maximum Firing 3.28 mmBtu/hr)	1995
Bright Annealing Furnace #3 (Maximum Firing 3.28 mmBtu/hr)	1995
Anode Cooling Tower	Prior to 1972
Billet Cooling Tower	Prior to 1972

7.2.3 Applicability Provisions and Applicable Regulations

a. An "affected process emission source" for the purpose of these unit-specific conditions is an emission unit described in conditions 7.2.1 and 7.2.2.

b. The affected process emission source is subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

c. The affected process emission source is subject to 35 IAC 212.322(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 2) [35 IAC 212.322(a)].

d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from an affected process emission source, except as provided in Sections 219.302, 219.303,

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

- e. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected process emission source is not subject to 35 IAC 217.121 for emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected process emission source is not by definition a fuel combustion emission unit.
- b. The affected process emission source is not subject to 35 IAC 216.121, emissions of Carbon Monoxide from fuel combustion emission units, because affected process emission source is not by definition a fuel combustion emission unit.

7.2.5 Operational and Production Limits and Work Practices

None

7.2.6 Emission Limitations

In addition to Conditions 5.2 2, 7.2.3 and the source-wide emission limitations in Condition 5.5, the sources listed below are subject to the following:

Emission limits are not set for the Billet Heating Furnace #1, Bright Annealing Furnace #2 and Bright Annealing Furnace #3 as potential to emit in the absence of permit limit is less than the significant and major source thresholds for any pollutant pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD).

7.2.7 Testing Requirements

Testing requirements are in the standard conditions of Section 8.

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the items required by Condition 7.2.6 for the affected process emission source to demonstrate compliance with emission limits of the Conditions 5.5.1 and 7.2.6 pursuant to Section 39.5(7)(b) of the Act.

7.2.10 Reporting Requirements

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

- a. If there is a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report within 30 days after the deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the deviation and efforts to reduce emissions and future occurrences.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.2.12 Compliance Procedures

- a. Compliance with the opacity limitations of Condition 5.2.2, the Permittee shall conduct a qualitative visible emissions observation once each day when operating to observe for the presence of abnormal visible emissions.

If such observations during operation do not detect observable emissions from affected process emission sources except shaft furnace, for a period of two weeks, the frequency of observations shall be reduced to once per week when operating. If the weekly observations do not detect observable emissions for a period of two months, the frequency of observations shall be reduced to once per month when operating. If abnormal visible emissions are detected the frequency of observations shall be increased to once a day. Observations thereafter may be reduced again if visible emissions are not detected for the period outlined above.

If abnormal visible emissions are observed, the Permittee shall initiate corrective actions to eliminate the abnormal visible emissions. If the Permittee cannot eliminate the abnormal visible emissions within 24 hours, the Permittee shall conduct a Method 9 test within three days after the qualitative observation showing abnormal emissions.

- b. Compliance with the emission limits in Condition 5.5.1 and 7.2.3 from an affected shaft furnace shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

Pollutant	Emission Rate lb/hr	
	Maximum	Typical
NO _x	8.63	3.54
PM	12.58	8.86
VOM	1.60	1.23
SO ₂	1.97	1.40

- c. Compliance with the emission limits in Condition 5.5.1 and 7.2.3 from furnaces other than shaft furnace shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

Pollutant	Emission Factor lbs/10 ⁶ scf
NO _x	100
PM	7.6
VOM	5.5
SO ₂	0.6

The emission factors for natural gas fired units are from Tables 1.4-1 and 1.4-2, AP-42 Fifth Edition, Volume 1, Supplement D, March, 1998.

$$\text{Emissions (ton/yr)} = (\text{natural gas usage, mscf/yr}) \times (\text{the applicable emission factor, lb/mscf}) \times (\text{ton}/2000 \text{ lb})$$

- d. Compliance with the emission limits in Condition 5.5.1 and 7.2.6 from the cooling tower shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission rates and formulas listed below:

Description	Emission Rate lb/hr
Anode Cooling Tower	PM 0.74
Billet Cooling Tower	PM 0.74

The emission rates are from the application.

$$\text{Emissions (ton/yr)} = \text{Hours of operation hrs/yr} \times \text{emission rate lb/hr} \times \text{ton}/2000 \text{ lb}$$

7.3 Unit 03: Building 80 Degreaser

7.3.1 Description

The source operates the degreaser (solvent cleaning machine) for removal of oil and grease from copper tubing by immersion in a solvent bath. It is an immersion batch cold cleaning machine (40 CFR 63.461 Definitions). Trichloroethylene that is classified as both VOM and HAP is currently used as the cleaning solvent. Emissions of VOM and HAP are the result of solvent evaporation

7.3.2 List of Emission Units and Pollution Control Equipment

Description	Emission Control	Date Constructed
Detrex Degreaser Model #2D-CC-SPL	Freeboard Refrigeration Device	October 1996

7.3.3 Applicable Regulations

- a. An "affected building 80 degreaser" for the purpose of these unit specific conditions, is each piece of equipment as listed in condition 7.3.2.
- b. The affected building 80 degreaser is subject to the NESHAP for Halogenated Solvent Cleaning, 40 CFR 63 Subparts A and T, because it uses Trichloroethylene in a total concentration greater than 5 percent by weight, as a cleaning agent.
- c. Pursuant to 40 CFR 63.462(a)(2), each owner or operator of an immersion batch cold solvent cleaning machine shall employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ratio of 0.75 or greater.
- d. Pursuant to 35 IAC 219.182(b), no person shall operate a cold cleaning degreaser unless:
 - i. The degreaser is equipped with a cover, which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counterweights or a powered system if:
 - A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F) [35 IAC 219.182(b)(1)(A)];
 - B. The solvent is agitated [35 IAC 219.182(b)(1)(B)]; or

- C. The solvent is heated above ambient room temperature [35 IAC 219.182(b)(1)(C)].
- ii. The degreaser is equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:
 - A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38° C (100° F) [35 IAC 219.182(b)(2)(A)]; or
 - B. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external [35 IAC 219.182(b)(2)(B)].
- iii. The degreaser is equipped with A freeboard height of over 91 cm (36 in), because the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) [35 IAC 219.182(b)(3)(A)];
- iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser [35 IAC 219.182(b)(4)]; and
- v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray [35 IAC 219.182(b)(5)].

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected building 80 degreaser is not subject to 35 IAC 219.301, because Trichloroethylene is not photochemically reactive material by 35 IAC 211.4690 definitions.

7.3.5 Operational and Production Limits and Work Practices

- a. Pursuant to 35 IAC 219.182(a), No person shall operate a cold cleaning degreaser unless:
 - i. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
 - ii. The cover of the degreaser is closed when parts are not being handled; and

- iii. Parts are drained until dripping ceases.

7.3.6 Emission Limitations

In addition to Condition 5.2.2, and the source-wide emission limitations in Condition 5.5 and 7.3.3, the affected building 80 degreaser is subject to the following:

- a. Trichloroethylene usage and emissions shall not exceed the following limits:

Solvent Usage		VOM Emissions	
(Tons/Mo)	(Tons/Yr)	(Tons/Mo)	(Tons/Yr)
24	100	20	84

These limits are based upon maximum solvent usage, operating hours and material balance as indicated in the permit application [T1].

- b. 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 [T1].
- c. Construction permit#96080020 was issued based upon replacement of an existing batch cold cleaning machine with the new machine without any increase in emissions above those previously allowed [T1].

The above limitations were established in construction permit #96080020, pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. These limits ensure that the construction and/or modification addressed in the aforementioned permit do not constitute a new major source or major modification pursuant to these rules.

7.3.7 Testing Requirements

- a. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the vapor pressure of the cleaning solvent, the exhaust ventilation rates, and the performance of any control devices shall be determine according to the methods specified in Condition 7.3.7(b).
- b. The following test methods shall be used to demonstrate compliance with 35 IAC 219 Subpart E:
 - i. Vapor pressures shall be determined by using the procedure specified in 35 IAC 219.110 [35 IAC 219.186(a)];

- ii. Exhaust ventilation rates shall be determined by using the procedures specified in 35 IAC 219.105(f)(3) [35 IAC 219.186(b)]; and
- iii. The performance of control devices shall be determined by using the procedures specified in 35 IAC 219.105(f) [35 IAC 219.186(c)].

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

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

- a. Records of the testing of the affected cold cleaning tank pursuant to Condition 7.3.7, which include the following [Section 39.5(7)(e) of the Act]:
 - i. The date, place and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.
- b. Cleaning solvent usage, lb/mo and lb/yr; and
- c. Records of monthly and annual aggregate VOM and HAP emissions from the affected cold cleaning tank shall be maintained, based on solvent consumption and the applicable emission factors and formulas, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected cold cleaning tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports

shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

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

Substitution or replacement of the cleaning solvent as long as the following conditions are met:

- a. VOM and HAP emissions do not exceed the limit specified in Condition 5.5 and 7.3.6.

7.3.12 Compliance Procedures

- a. For determination of compliance with the limits of this permit, solvent emissions shall be determined by the following equation:

$$U = V - (W \times P)$$

Where:

U = Solvent emissions for compliance determinations (gallons)

V = Virgin solvent^a added to the degreasers (gallons), as determined by daily addition log sheets.

W = Waste solvent^b removed from the degreasers and sent off-site for reclamation or disposal, as determined by monthly manifests.

P = Percent concentration of solvent in waste, as determined by analysis/testing^c.

^a For purposes of this permit, virgin solvent is defined as unused solvent.

^b For purpose of this permit, waste solvent is defined as used solvent.

^c The percent concentration of solvent in waste (P) shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste,

Physical/Chemical Methods (SW-846), Test Method 8260.

- b. Compliance with the organic material emission limits shall be calculated using the solvent density as specified in the Material Safety Data Sheet, and the solvent usage (U) per month, as follows:

Emission = Solvent Usage (gallon/month) x Solvent Density (lb/gallon)

- c. i. Cerro will comply with Condition 7.3.3(d)(i) by using a mechanically aided cover because the solvent is heated above ambient room temperature.
- ii. Cerro will comply with Condition 7.3.3(d)(ii) by using the internal drainage device that is integral to the Building 80 Degreaser.
- iii. Cerro will comply with Condition 7.3.3(d)(iii) with a freeboard greater than 36 inches because the Building 80 Degreaser solvent vapor pressure is greater than 32 mmHg.
- iv. Cerro will comply with Condition 7.3.3(d)(v) by not using any solvent spray with the Building 80 Degreaser.

7.4 Unit 04: Tube Mill ConveyORIZED Degreasing

7.4.1 Description

Copper billets are made into tubing shells using an extrusion press. These shells are further shaped into final copper tubing using drawing blocks and drawing benches. Drawing oils are used to lubricate the copper tubing shell so the final thickness and diameter of the copper tubing can be obtained without undue stress on the tubing. Before the tubing can be sold the drawing oil is removed and the tubing is marked.

From the time these emission units were installed (pre-1972) until 1993, Cerro poured 1,1,1-trichloroethylene over the tubing by pumping the cleaning solvent from a 55-gallon drum. This effectively cleaned the tubing, but with the passage of the Halogenated Solvent MACT, Cerro sought a more environmentally friendly method. Cerro constructed a specialized cleaning box to both clean the copper tubing in preparation for marking with inks and as a pollution prevention technique. Copper tubes are conveyed through cleaning boxes, which vary in size with the copper tubing. A metal lid is used to close the metal cleaning box. The solvents used in the cleaning process are pumped via positive pressure from a 55-gallon drums (for kerosene or stodard solvent) or plastic reservoirs (for propanol) located near the cleaning box through tubes and to the cleaning box. In the cleaning box a solid stream of solvent soaks felt pads. Cerro uses kerosene, propanol, and stodard solvent as cleaning agents.

The cleaning box has two openings, one on either side. The size of these openings depends upon the diameter of the copper tubes. Clearance for the copper tubing through these openings is a few millimeters.

Once the copper tubing enters the box it passes through felt pad(s), which have been soaked with solvent. The pads thoroughly coat the tubing with solvent. Immediately after the felt pad(s), is a rubber squeegee, which removes the solvents and oils. There are typically a series of felt pads and rubber squeegees. The excess cleaning agents are drained once enough of the agent is collected.

7.4.2 List of Emission Units and Pollution Control Equipment

Description	Date Constructed
#8 Coiler	Pre 1972
#1 Coiler	Pre 1972
#5 Coiler	Pre 1972
#4 Coiler	Pre 1972
#2 Coiler	Pre 1972

Description	Date Constructed
#6 Coiler	January, 96
#3 Coiler	Pre 1972
#7 Coiler	January, 96
#1B Straightener	Pre 1972
#1 Schumag	
#2 Schumag	
#3 Schumag	
#6 Straightener	Pre 1972
#4 Straightener	Pre 1972
#3 Straightener	Pre 1972
Bldg. 80 #1 Straightener	Pre 1972
Bldg. 80 #2 Straightener	January, 98
#5 Straightener	Pre 1972
#1 Shearer	Pre 1972
#2B Straightener	Pre 1972

7.4.3 Applicable Regulations

- a. An "affected conveyORIZED degreasing" for the purpose of these unit specific conditions, is each piece of equipment as listed in condition 7.4.2.
- b. No person shall operate a conveyORIZED degreaser unless 219.184(a):
 - i. The degreaser is equipped with a drying tunnel, rotating (tumbling) basket or other equipment sufficient to prevent cleaned parts from carrying out solvent liquid or vapor;
 - ii. The degreaser is equipped with the following switches:
 - A. One which shuts off the sump heat source if the amount of condenser coolant is not sufficient to maintain the designed vapor level;
 - B. One which shuts off the spray pump or the conveyor if the vapor level drops more than 10 cm (4 in) below the bottom condenser coil; and
 - C. One which shuts off the sump heat when the vapor level exceeds the design level.
 - iii. The degreaser is equipped with openings for entrances and exits that silhouette workloads so that the average clearance between the parts and the edge of the degreaser opening is less than 10 cm (4 in) or less than 10 percent of the width of the opening;

- iv. The degreaser is equipped with downtime covers for closing off entrances and exits when the degreaser is shut down; and
- v. The degreaser is equipped with one of the following control devices, if the air/vapor interface is larger than 2.0 square meters (21.6 ft²):
 - A. A carbon adsorption system with ventilation greater than or equal to 15 cubic meters per minute per square meter (50 cubic feet per minute per square foot) of air/vapor area when downtime covers are open, and exhausting less than 25 ppm of solvent by volume averaged over a complete adsorption cycle; or
 - B. Any other equipment or system of equivalent emission control as approved by the Illinois EPA, and further processed consistent with Section 219.108 of this Part. Such equipment or system may include a refrigerated chiller.

7.4.4 Non-Applicability of Regulations of Concern

None

7.4.5 Operational and Production Limits and Work Practices

- a. Pursuant to 35 IAC 219.184(a), No person shall operate a conveyORIZED degreaser unless:
 - i. Exhaust ventilation exceeding 20 cubic meters per minute per square meter (65 cubic feet per minute per square foot) of area of loading and unloading opening is not used, unless necessary to meet the requirements of the Occupational Safety and Health Act (29 U.S.C. Section 651 et seq.);
 - ii. Solvent carry out emissions are minimized by:
 - A. Racking parts for best drainage; and
 - B. Maintaining the vertical conveyor speed at less than 3.3 m/min (11 ft/min).
 - iii. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;

- iv. Solvent leaks are repaired immediately;
- v. Water is not visually detectable in solvent exiting from the water separator; and
- vi. Downtime covers are placed over entrances and exits of conveyORIZED degreasers immediately after the conveyors and exhausts are shut down and not removed until just before start-up.

7.4.6 Emission Limitations

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

- a. Non photochemically reactive solvent usage and emissions from the affected conveyORIZED degreasing shall not exceed the following limits:

Solvent Usage		VOM Emissions	
(Tons/Mo)	(Tons/Yr)	(Tons/Mo)	(Tons/Yr)
24	176	24	176

These limits are based upon maximum solvent usage, operating hours and material balance as indicated in the permit application [T1N].

- b. 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 [T1N].
- c. This permit is issued based upon replacement of an existing conveyORIZED degreasing with the new without any increase in emissions [T1N].

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the affected conveyORIZED degreasing below the levels that would trigger the applicability of the rule, consistent with the information provided in the CAAPP application [T1N].

7.4.7 Testing Requirements

- a. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the vapor pressure

of the cleaning solvent shall be determined according to the methods specified in Condition 7.4.7(b).

- b. The following test methods shall be used to demonstrate compliance with 35 IAC 218 Subpart E:
 - i. Vapor pressures shall be determined by using the procedure specified in 35 IAC 219.110 [35 IAC 219.186(a)];

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

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

- a. Records of the testing of the affected conveyORIZED degreasing pursuant to Condition 7.4.7, which include the following [Section 39.5(7)(e) of the Act]:
 - i. The date, place and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.
- b. Cleaning solvent usage, lb/mo and lb/yr; and
- c. Records of monthly and annual aggregate VOM emissions from the affected conveyORIZED degreasing shall be maintained, based on solvent consumption and the applicable emission factors and formulas, with supporting calculations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected conveyORIZED degreasing with the permit requirements as

follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

None

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

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

Substitution or replacement of the cleaning solvent as long as the following conditions are met:

- a. VOM emissions do not exceed the limit specified in Condition 5.5.

7.4.12 Compliance Procedures

- a. For determination of compliance with the limits of this permit, solvent emissions shall be determined by the following equation:

$$U = V - (W \times P)$$

Where:

U = Solvent emissions for compliance determinations (gallons)

V = Virgin solvent^a added to the degreasers (gallons), as determined by monthly addition log sheets.

W = Waste solvent^b removed from the degreasers and sent off-site for reclamation or disposal, as determined by monthly manifests.

P = Percent concentration of solvent in waste, as determined by analysis/testing^c.

^a For purposes of this permit, virgin solvent is defined as unused solvent.

^b For purpose of this permit, waste solvent is defined as used solvent.

c The percent concentration of solvent in waste (P) shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

- b. Compliance with the organic material emission limits shall be calculated using the solvent density as specified in the Material Safety Data Sheet, and the solvent usage (U) per month, as follows:

Emission = Solvent Usage (gallon/month) x Solvent Density (lb/gallon)

- c. i. Cerro will comply with Condition 7.4.3(b)(i). by using other equipment sufficient to prevent cleaned parts from carrying out solvent. There is no drying tunnel or rotating (tumbling) basket on any of the affected equipment. The other equipment is the series of felt and rubber pads described in Condition 7.4.1.
- ii. Cerro complies with Condition 7.4.3(b)(ii), which requires equipment switches for sump heat source and spray pump. There is no sump heat source; therefore, there can be no sump heat source switch. There is a spray pump, but the equipment does not have any condenser coils; therefore, no switch is required to turn the pump off if the vapor level drops below 4 inches from the bottom of the condenser coils.
- iii. Cerro complies with Condition 7.4.3(b)(v), which requires a control device if the air/vapor interface is greater than 2.0 square meters. None of the conveyORIZED degreasing operations have an air/vapor interface greater than 2.0 square meters; therefore, no control device is required.
- iv. Cerro complies with Condition 7.4.5(a)(ii)(B), which requires a vertical conveyor speed less than 11 ft/minute. The conveyor does not have a vertical component removing parts from either a liquid or vapor solvent bath. This zero vertical speed is less than 11 ft/min requirement.
- v. Cerro complies with Condition 7.4.5(a)(vi), which requires covers be placed over entrances and exits of degreasers by removing solvent from the cleaning boxes and storing it closed drums when the degreasers are not operating.

7.5 Unit 05: Building 80 Solvent Tank

7.5.1 Description

The Building 80 solvent tank is used for storing solvent for degreasing purpose.

7.5.2 List of Emission Equipment and Pollution Control Equipment

Description	Emission Control	Date Constructed
Building 80 Solvent Tank 4500 Gallons	Submerged Loading	1997

7.5.3 Applicability Provisions

- a. The "affected storage tank", for the purpose of these unit-specific conditions is an emission unit described in conditions 7.5.1 and 7.5.2.
- b. No person shall cause or allow the loading of any organic material in any stationary tank having a storage capacity of greater than 946 liter (250 gallon), unless such tank is equipped with a permanent submerged loading pipe [35 IAC 219.122(b)]. Except as provided in the following exemptions: If the tank is a pressure tank then the limitations of 35 IAC 219.122(b) shall not apply [35 IAC 219.121(a)] or if no odor nuisance exists then the limitation of 35 IAC 219.122(b) shall only apply when the tank is used to store a volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F [35 IAC 219.122(c)].

7.5.4 Non-Applicability of Regulations of Concern

- a. The affected storage tank is not subject to the requirements of 35 IAC 219.121, because the tank is less than 40,000 gal.
- b. The affected storage tank is not subject to the requirements of 35 IAC 219.122(a), because the tank is less than 40,000 gal.

7.5.5 Operational and Production Limits and Work Practices

The affected storage tank shall be equipped and operated with a submerged loading pipe for submerged fill.

7.5.6 Emission Limitations

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

None

Emission limits are not set for the affected storage tank, as potential to emit in the absence of permit limit is less than the significant and major source thresholds for any pollutant pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD).

7.5.7 Testing Requirements

None

7.5.8 Inspection and Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected tank to demonstrate compliance with Condition 7.5.5 and 7.5.6 pursuant to Section 39.5(7) of the Act:

- a. Design information for the tank showing the presence of a submerged loading pipe or submerged fill;
- b. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe;
- c. The throughput of the affected storage tanks, gal/yr; and
- d. The annual VOM emissions from the affected storage tanks based on the material stored, the tank throughput, and the applicable emission factors and formulas with supporting calculations.

7.5.10 Reporting Requirements

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

- a. Any loading of gasoline or other VOL into an affected tank that is not in compliance with Condition 7.5.5, e.g., an inoperative or no "submerged loading pipe or submerged fill" within five days of becoming aware of the noncompliance status. This notification shall include a description of the event, the cause for the noncompliance, actions taken to correct the noncompliance and the steps taken to avoid future noncompliance.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

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

- a. Changes to components related to either the "submerged loading pipe or submerged fill", including addition of new components and repair and replacement of components; and
- b. Changes in the material stored in a tank provided the tank continue to comply with the Conditions of Section 7.5.5 of this permit.

7.5.12 Compliance Procedures

Compliance with the emission limits in condition 5.5 and 7.5.6 shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

For the purpose of estimating VOM emissions from the affected storage tank, the current version 4.09 of the TANKS program is acceptable, or any subsequent program submitted by the Permittee and accepted by Illinois EPA.

7.6 Unit 06: Gasoline Storage Tank

7.6.1 Description

The tank is used for storing gasoline.

7.6.2 List of Emission Equipment and Pollution Control Equipment

Description	Emission Control	Date Constructed
Gasoline Storage Tank 1000 Gallons	Submerged Loading	1992

7.6.3 Applicability Provisions

- a. The "affected storage tank", for the purpose of these unit-specific conditions is an emission unit described in conditions 7.6.1 and 7.6.2.
- b. No person shall cause or allow the loading of any organic material in any stationary tank having a storage capacity of greater than 946 liter (250 gallon), unless such tank is equipped with a permanent submerged loading pipe [35 IAC 219.122(b)]. Except as provided in the following exemptions: If the tank is a pressure tank then the limitations of 35 IAC 219.122(b) shall not apply [35 IAC 219.121(a)] or if no odor nuisance exists then the limitation of 35 IAC 219.122(b) shall only apply when the tank is used to store a volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70⁰ F [35 IAC 219.122(c)].
- c. No person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary tank at gasoline dispensing operation, unless such tank is equipped with a submerged loading pipe [35 IAC 219.583(a)(1)].

7.6.4 Non-Applicability of Regulations of Concern

- a. The affected storage tank is not subject to the requirements of 35 IAC 219.121, because the tank is less than 40,000 gal.
- b. The affected storage tank is not subject to the requirements of 35 IAC 219.122(a), because the tank is less than 40,000 gal.

7.6.5 Operational and Production Limits and Work Practices

Each affected storage tank is subject to the applicable provisions of Condition 7.6.3. The affected storage tank

shall be equipped and operated with a submerged loading pipe for submerged fill.

7.6.6 Emission Limitations

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

None

Emission limits are not set for the affected storage tank, as potential to emit in the absence of permit limit is less than the significant and major source thresholds for any pollutant pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD).

7.6.7 Testing Requirements

None

7.6.8 Inspection and Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected tank to demonstrate compliance with Condition 7.6.5 and 7.6.6 pursuant to Section 39.5(7) of the Act:

- a. Design information for the tank showing the presence of a submerged loading pipe or submerged fill;
- b. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe;
- c. The throughput of the affected storage tanks, gal/yr; and
- d. The annual VOM emissions from the affected storage tanks based on the material stored, the tank throughput, and the applicable emission factors and formulas with supporting calculations.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected

storage tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Any loading of gasoline or other VOL into an affected tanks that is not in compliance with Condition 7.6.5, e.g., an inoperative or no "submerged loading pipe or submerged fill" within five days of becoming aware of the noncompliance status. This notification shall include a description of the event, the cause for the noncompliance, actions taken to correct the noncompliance and the steps taken to avoid future noncompliance.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

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

- a. Changes to components related to either the "submerged loading pipe or submerged fill", including addition of new components and repair and replacement of components; and
- b. Changes in the material stored in a tank provided the tank continue to comply with the Conditions of Section 7.6.5 of this permit.

7.6.12 Compliance Procedures

Compliance with the emission limits in condition 5.5 and 7.6.6 shall be based on the recordkeeping requirements in Condition 7.6.9 and the emission factors and formulas listed below:

For the purpose of estimating VOM emissions from the affected storage tank, the current version 4.09 of the TANKS program is acceptable, or any subsequent program submitted by the Permittee and accepted by Illinois EPA.

7.7 Unit 07 - Fugitive Emissions

7.7.1 Description

Fugitive emissions are defined as those emissions, which would not reasonably pass through a stack, vent or other functionally equivalent opening.

7.7.2 List of Emission Units

Vehicular Mile Traveled (VMT) on Paved Roads
Vehicular Mile Traveled (VMT) on Unpaved Roads
Furnace Heel Burning

7.7.3 Applicability Provisions and Applicable Regulations

- a. The "affected fugitive emission sources" for the purpose of these unit-specific conditions, are emission sources described in Conditions 7.7.1 and 7.7.2.

7.7.4 Non-Applicability of Regulations of Concern

- a. The affected fugitive emission sources of PM are not subject to the requirements of 35 IAC 212.321, Emissions of Particulate Matter from Process Emission Units, because due to the unique nature of this process, such rules cannot reasonably be applied.

7.7.5 Operational and Production Limits and Work Practices

None

7.7.6 Emission Limitations

In addition to Condition 5.2.2 and the source-wide emission limitations in Condition 5.5, the fugitive emission sources are subject to the following:

None

7.7.7 Testing Requirements

None

7.7.8 Inspection Requirements

None

7.7.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected fugitive emission sources to demonstrate

compliance with Conditions 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Paved and unpaved roads (VMT/yr); and
- b. Furnace heel cutting (Number of burn bars/yr).

7.7.10 Reporting Requirements

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

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.7.12 Compliance Procedures

Compliance with the limits in Conditions 5.5.1 shall be based on the recordkeeping requirements in Condition 7.7.9 and the emission factors listed below:

- a. PM Emissions from Vehicular Mile Traveled (VMT) on roads:

Uncontrolled PM Emission Factors		
	Paved lb/VMT	Unpaved lb/VMT
Semi Truck	18.04	13.06
Spotter	18.04	11.52
Lift Truck	1.23	1.76
Flat	3.47	5.71
Dump Truck	5.10	3.41

- b. PM Emissions from furnace heel burning:

The PM emission rate for heel burning is based upon the number of bars used. The maximum and typical emission factors are 14.47 lbs/bar and 13.02 lbs/bar, respectively. The maximum and typical bar usage is 20 bars/hour and 12 bars per hour, respectively. The maximum and typical emission rates are 292 pounds per hour and 157 pounds per hour, respectively.

The above emission factors and rates are from the application.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after July 19, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

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

- a. The changes do not violate applicable requirements;

- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air

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

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

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section
Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office
Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234
 - iii. Illinois EPA - Air Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506
 - iv. USEPA Region 5 - Air Branch
USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance

certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements

underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

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

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

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

Where:

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

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

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	Lb/hr
A	1.214	2.54
B	0.534	0.534

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

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	Lb/hr
A	11.42	24.8
B	0.16	0.16

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

Metric		English	
P	E	P	E
Mg/hr	kg/hr	ton/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.2	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

Where:

P = Process weight rate in Mg/hr or T/hr; and
E = Allowable emission rate in Kg/hr or lbs/hr

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

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

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation [35 IAC 212.322(b)]:

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

Where:

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

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

	Metric	English
P	Mg/hr	ton/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67

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

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

- c. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972

P	Metric	English	E
	E	P	
Mg/hr	kg/hr	T/hr	lbs/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.	8.7	10.00	19.20
13.	11.1	15.00	25.20
18.	13.8	20.00	30.50
23.	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

Where:

P = Process weight rate in Mg/hr or T/hr; and
E = Allowable emission rate in Kg/hr or lbs/hr

10.3 Attachment 3 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.4 Attachment 4 - Guidance on Revising This Permit

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

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

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

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
 - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.
2. Minor Permit Modification
 - Do not violate any applicable requirement;

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

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

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

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

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

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

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

10.6 Attachment 6 - Guidance on Renewing This Permit

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

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

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

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

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

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

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

Mail renewal applications to:

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