ATTACHMENT A

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE PEOPLE OF ILLINOIS,)	
Complainant,)	
v. NACME STEEL PROCESSING, LLC,)))	PCB No. 13 - 12 (Enforcement – Air)
a Delaware limited liability corporation, Respondent.)	

NOTICE OF SERVICE

To: See Attached Service List

(VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that I have today filed with the Illinois Pollution Control
Board, the <u>PEOPLE'S MOTION FOR SUMMARY JUDGMENT ON ALL COUNTS OF</u>
<u>COMPLAINT AGAINST RESPONDENT, NACME STEEL PROCESSING, LLC</u>

Respectfully submitted,

Nancy J. Tikalsky

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Environmental Bureau

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Date: May 16, 2014

THIS FILING IS SUBMITTED ON RECYCLED PAPER

SERVICE LIST

Edward V. Walsh, III ReedSmith LLP 10 South Wacker Drive Chicago, Illinois 60606-7507

Bradley P. Halloran, Hearing Officer Illinois Pollution Control Board 100 W. Randolph Street, Suite 11-500 Chicago, Illinois 60601

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE PEOPLE OF ILLINOIS,)	
Complainant,)	
v.).)	PCB No. 13 - 12 (Enforcement – Air)
NACME STEEL PROCESSING, LLC,)	(Emorcement – Air)
a Delaware limited liability corporation,)	
Respondent.)	

CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that on May 16, 2014, I served true and

correct copies of the PEOPLE'S MOTION FOR SUMMARY JUDGMENT ON ALL

COUNTS OF COMPLAINT AGAINST RESPONDENT, NACME STEEL

PROCESSING, LLC, upon the persons and by the methods as follows:

[First Class U.S. Mail]

Edward V. Walsh, III ReedSmith LLP 10 South Wacker Drive Chicago, Illinois 60606-7507 [electronically]

Bradley P. Halloran, Hearing Officer Illinois Pollution Control Board 100 W. Randolph Street, Suite 11-500 Chicago, Illinois 60601

Nancy J. Tikalsky

Assistant Attorney General

Office of the Illinois Attorney General

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69 West Washington Street, Suite 1800

Chicago, IL 60602

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Date: May 16, 2014

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 13 - 12) (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability company,	
Respondent	3

PEOPLE'S MOTION FOR SUMMARY JUDGMENT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN,
Attorney General of the State of Illinois ("Complainant" or "State" or "People"),
pursuant to Section 101.516 of the Illinois Pollution Control Board's ("Board")

Procedural Regulations, 35 Ill. Adm. Code 101.516 and Section 2-1005 of the Illinois
Code of Civil Procedure, 735 ILCS 5/2-1005 (2012), hereby moves for summary
judgment in favor of the People and against the Respondent, NACME STEEL

PROCESSING, LLC ("Respondent" or "Nacme") on the issue of liability and civil
penalties as alleged in the People's Complaint filed on September 5, 2012 ("Complaint")
(hereto attached as Exhibit A). For the reason that the pleadings, depositions, admissions
and affidavits show that there is no genuine issue as to any material fact, the Complainant
is entitled to summary judgment on liability and civil penalties as a matter of law. In
support thereof, Complainant states as follows:

I. INTRODUCTION

From at least April 16, 2002 through February 11, 2012, Respondent conducted pickling operations at its steel processing facility located at 429 West 127th Street, Chicago, Cook County, Illinois ("Facility"), a major source for air emissions, without a

Title V Clean Air Act Permit Program ("CAAPP") permit or, in the alternative, a Federally Enforceable State Operating Permit ("FESOP") in violation of Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010). In 2001, the Illinois Environmental Protection Agency ("Illinois EPA" or "Agency") issued Nacme a State Operating Permit No. 96020074 for air emissions with an expiration date of October 25, 2005 ("Nacme's SOP").

During the relevant time period, April 16, 2002 through February 11, 2012,

Nacme submitted FESOP applications and a construction application to the Agency

attesting that Nacme's Facility was a major source with a potential to emit ("PTE")

hydrochloric acid ("HCL"), a hazardous air pollutant ("HAP"), air emissions greater than State

10 tons per year ("tpy"). Each application relied on reports from one of the following

stack tests conducted at Nacme's Facility on the following dates: April 16, 2002, ("April 2002 Stack Test"), and December 21, 2006 ("December 2006 Stack Test").

October 18, 2005 was the first time Nacme submitted to the Agency a CAAPP application requesting a FESOP to conduct pickling operations at the Facility, which relied on Nacme's April 2002 Stack Test results ("2005 FESOP Application"). Nacme submitted its 2005 FESOP Application 3½ years after Nacme had obtained the results for its April 2002 Stack Test showing that the PTE HCL air emissions exceeded 10 tpy, and after the Agency determined Nacme's two prior SOP renewal applications submitted in 2005 to be incomplete for failure to provide: 1.) adequate emissions information to assess the Facility's HCL PTE, and 2.) justification for Nacme's proposed actual air emissions

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factors for the HCL ("April 2005 Notice of Incompleteness" and "September 2005 Notice of Incompleteness").

In the September 2005 Notice of Incompleteness, the Agency informed Nacme it was required to submit a CAAPP application because its PTE HCL air emissions exceeded 10 tpy for a single source during the April 2002 Stack Test, which qualified the Facility as a major source for purposes of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010). In the same notice, the Agency stated that Nacme needed to submit a construction permit application if it wanted the Agency to consider an increase in the maximum annual steel throughput process rate ("process rate") proposed in its 2005 FESOP Application because the process rate proposed in Nacme's 2005 FESOP application exceeded the previous process rates the Agency could consider for the 2005 FESOP application as follows: 1.) the process rate derives from Nacme's April 2002 Stack Test results, and 2.) the process rate the Agency permitted Nacme's SOP ("Process Modification").²

BEIL.

In its 2005 FESOP Application, Nacme proposed a FESOP which would permit the Facility to operate with a Process Modification. At that time, Nacme failed to submit a construction permit application for the Process Modification proposed in its 2005 FESOP Application. In December 2005, the Agency informed Nacme a construction permit would be required for the Agency to issue a FESOP with the Process Modification as proposed in Nacme's 2005 FESOP Application. At the same time, the Agency informed Nacme that it would need to conduct a stack test at the proposed process rate

¹ Nacme's initial SOP renewal application received by the Agency on April 12, 2005 was determined to be incomplete by the Agency in a letter dated April 13, 2005. Nacme again submitted an SOP renewal application received by the Agency on September 12, 2005 in response to the April 2005 Notice of Incompleteness, which the Agency also determined to be incomplete in a letter dated September 20, 2005. 2 Nacme's 2005 FESOP application proposed a process rate of 85.6 tph while its April 2002 Stack Test shows that the stack test was conducted at a process rate of 33.3 tph.

because the April 2002 Stack Test resulted in a process rate below the process rate proposed in its 2005 FESOP Application.

In March 2007, Nacme submitted to the Agency a change request to its 2005
FESOP Application for a proposed Process Modification that equaled the process rate
conducted during its December 2006 Stack Test ("2007 FESOP Application").³
Although Nacme submitted a Fee Determination for Construction Permit Application
with its request, Nacme failed to submit a construction permit application for the Process
Modification. Once again, the Agency informed Nacme a construction permit would be
required that included the equivalent Process Modification proposed in its 2007 FESOP
Application because it was a change in process rate from Nacme's SOR.

On February 12, 2012, Nacme submitted a construction permit application for the Process Modification it requested in its 2007 FESOP Application. On April 26, 2012, the Agency approved and issued Construction Permit – NSPS Source No. 031600FWL ("2012 Construction Permit"). A special condition in the Construction Permit authorized Nacme to operate the equipment listed in the Construction Permit at the Facility with the proposed Process Modification until the Agency takes final action on the 2012 FESOP Application.

Nacme's Answer and Affirmative Defense of Nacme Steel Processing, LLC to the Complaint of the People of the State of Illinois ("Answer")(hereto attached as Exhibit B and incorporated herein), Nacme Steel Processing, LLC.'s Response to Complainant's First Request for Admission of Facts ("Nacme's Admission of Facts") (hereto attached as Exhibit C and incorporated herein), the Deposition of Britt Wenzel ("Wenzel

³ Nacme proposed a Process Modification from the current process rate of 33.3 tph in its 2005 FESOP application to a process rate of 119.9983 tph.

Deposition") (hereto attached as Exhibit D and incorporated herein), together with the People's affidavits by Valeriy Brodsky ("IEPA Brodsky's Affidavit) (hereto attached as Exhibit E and incorporated herein) and Tom Reuter ("IEPA Reuter Affidavit")(hereto attached as Exhibit F and incorporated herein), support this motion and establish all material facts necessary to prove Nacme's liability and the People's entitlement to penalties. Accordingly, because there is no genuine issue of material fact, the People are entitled to summary judgment and civil penalties as a matter of law.

II. PROCEDURAL HISTORY

On September 5, 2012, the People filed a one-count Complaint against Nacme alleging violations of the Act, 415 ILCS 5/1 et seq. The People allege that Respondent violated Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010). Specifically, the People allege Nacme 'Operated a Major Stationary Source without a Clean Air Act Permit Program permit' from at least April 16, 2002 through February 11, 2012.

On November 2, 2012, the People received service of Nacme's Answer, which had been filed with the Board on November 1, 2012.

On November 30, 2012, the People filed with the Board its Motion to Strike and Dismiss Respondent's Affirmative Defenses. On January 8, 2013, the Hearing Officer issued an Order granting the parties an agreed motion to allow Respondent to withdraw its affirmative defenses and file amended affirmative defenses to the Complaint. On January 16, 2013, the People received service by Nacme of its Amended Affirmative Defenses to the Complaint, which had been filed with the Board on January 15, 2013. On February 8, 2013, the People filed with the Board its Motion to Strike and Dismiss

Respondent's Amended Affirmative Defenses. On March 11, 2013, Nacme filed its Response to People's Motion to Strike and Dismiss Respondent's Amended Affirmative Defenses. On March 25, 2013, People filed its Motion for Leave to File Reply Instanter and Reply Brief in Support of Motion to Strike and Dismiss Respondent's Amended Affirmative Defenses, and on April 1, 2013, Nacme filed its Objection to State's Request to File Reply Brief in Support of Motion to Strike Affirmative Defenses. On June 6, 2013 the Board issued an order allowing Nacme's Amended Affirmative Defenses on Laches and Waiver only.

III. STATEMENT OF UNDISPUTED FACTS

The Agency is an administrative agency established in the executive branch of the State government by Section 4 of the Act, 415 ILCS 5/4 (2010), and charged, *inter alia*, with the duty of enforcing the Act. [Exhibit B, Answer ¶2]

Respondent, Nacme, is and has been a Delaware corporation registered in good standing with the Illinois Secretary of State and duly authorized to do business in the State of Illinois. [Exhibit B, Answer ¶3; Exhibit C, Nacme's Admission of Facts, Facts 1 and 2].

Nacme owns and operates a steel processing facility located at 429 West 127th Street, Chicago, Cook County, Illinois. [Exhibit B, Answer ¶3; Exhibit C, Nacme's Admission of Facts, Fact 1]

At the Facility, Nacme operates a continuous coil pickling line, comprised of four (4) pickling tanks in a turbo tunnel enclosure, and a four (4) stage washer. [Exhibit B, Answer ¶4; Exhibit C, Nacme's Admission of Facts, Fact 4] Emissions from the

pickling tanks and washer are vented to a Pro-Eco four tray scrubber ("scrubber").

[Exhibit B, Answer ¶4; Exhibit C, Nacme's Admission of Facts, Fact 3]

The pickling tanks, which can be heated to approximately 190 degrees Fahrenheit, utilize HCL at various concentrations in a dissolution process to remove impurities from hot rolled steel ("pickling"). [Exhibit B, Answer ¶5; Exhibit C, Nacme's Admission of Facts, Fact 4] After pickling, the steel goes through an aqueous based four stage washer ("washing"). [Exhibit B, Answer ¶5; Exhibit C, Nacme's Admission of Facts, Fact 4]

During the pickling and washing, air emissions are captured in ducts with a TurboTunnel enclosure and transported via piping to the scrubber. [Exhibit B, Answer ¶6] Additionally, pickling and washing tanks containing the HCL are equipped with covers to minimize exposure of HCL to the atmosphere when not in use. [Exhibit B, Answer ¶6; Exhibit C, Nacme's Admission of Facts, Fact 2]

On February 8, 2001, the Agency issued Nacme's SOP for control of its air emissions at the Facility. [Exhibit B, Answer ¶7] Nacme's SOP was issued as a condition of settlement of a permit appeal PCB 01-85. [Exhibit F1, IEPA Reuter Affidavit – Nacme's SOP, page 1, ¶1] Nacme's SOP expired on October 25, 2005. [Exhibit B, Answer ¶7; Exhibit F1, IEPA Reuter Affidavit – Nacme's SOP]

Nacme's SOP permitted a process rate at the Facility of 600,000 tpy⁴ and an emission factor of 4.8 lbs of HCL per 1000 tons of steel throughput ("SOP emission factor")[Exhibit F1, IEPA Reuter affidavit – Nacme's SOP, page 1, ¶2]

On April 11, 2002, Nacme submitted an Operating Permit Revision Application with a cover letter requesting an operating permit revision and construction permit ("2002 Construction Permit Application"). [Exhibit F2, IEPA Reuter Affidavit – 2002

 $^{4 600,000 \}text{ tpy/}24 \times 365 = 69 \text{ tph.}$ [Exhibit E, IEPA Brodsky Affidavit ¶10]

Construction Permit Application] The 2002 Construction Permit Application addressed a modification to the Facility, installing a TurboTunnel enclosure, and requested an allowance to operate at a higher process rate of 750,000 tpy.⁵ [Exhibit F2, IEPA affidavit – 2002 Construction Permit Application, page NMLP 0784]

On April 12, 2002, the Agency issued the 2002 Construction Permit to Nacme for the installation of an emissions tunnel and retesting of the modified steel pickling process. [Exhibit F3, IEPA Reuter Affidavit – 2002 Construction Permit] The 2002 Construction Permit allowed Nacme to operate with an emission factor of 4.8 and a process rate of 750,000 tpy for the purposes of stack testing only, which was greater than the process rate of 600,000 tpy permitted by Nacme's SOP. [Exhibit B, Answer ¶8; Exhibit F3, IEPA Reuter Affidavit – 2002 Construction Permit, page 1, ¶1; Exhibit F1, IEPA Reuter Affidavit – Nacme's SOP, page 1, ¶2]

On April 16, 2002, Nacme conducted the April 2002 Stack Test. [Exhibit B, Answer ¶9] The April 2002 Stack Test report indicated a process rate of 33.3 tons per hour ("tph"). [Exhibit E, IEPA Brodsky Affidavit, ¶3, (referencing Exhibit F4 IEPA Reuter Affidavit - April 2002 Stack Test, page IEPA FOIA 408); Exhibit F9, IEPA Reuter Affidavit - September 2005 Notice of Incompleteness, page 1, ¶2]

The April 2002 Stack Test resulted in PTE HCL air emissions of 95 tpy, which is greater than 10 tpy. [Exhibit E, IEPA Brodsky Affidavit, ¶¶4 and 10 (referencing average HCL controlled emissions found at F4, IEPA Reuter Affidavit - April 2002 Stack Test, 2.0 Summary of Results chart, page IEPA FOIA 402, line 2 and 6.0 Test Results

^{5 750,000} tpy process rate divided by (24x365) = 85.6tph process rate. [See Exhibit E, IEPA Brodsky affidavit, ¶10]

^{6 33.3} tph process rate x (24x365) = 292,000 tpy process rate. [See Exhibit E, IEPA Brodsky affidavit, ¶10]

Summary, page IEPA FOIA 406, line 9; Exhibit F9, IEPA Reuter Affidavit - September 2005 Notice of Incompleteness, pages 1-2, ¶3)]

On May 16, 2002, the Agency denied Nacme's Operating Permit Application Revised dated April 11, 2002 ("2002 Operating Permit Denial"). [Exhibit F5, IEPA
Reuter Affidavit - 2002 Operating Permit Denial]

On April 4, 2005, the Agency received a permit renewal application for Nacme's SOP submitted by Nacme ("April 2005 SOP Renewal Application"). [Exhibit B, Answer ¶10; Exhibit F6, IEPA Reuter Affidavit - April 2005 SOP Renewal Application]

On April 13, 2005, the Agency issued a Notice of Incompleteness to Nacme's April 2005 SOP Renewal Application for failure to provide detailed calculations for the Facility's actual emissions and PTE of hazardous air pollutant, HCL, and failure to provide updated information on production rate and emissions based on its April 2002 Stack Test. [Exhibit F7, IEPA Reuter Affidavit, April 2005 Notice of Incompleteness, page 1, ¶¶1 and 2]

On September 12, 2005 the Agency received a second permit renewal application for Nacme's SOP submitted by Nacme ("September 2005 SOP Renewal Application").

[Exhibit B, Answer ¶12; Exhibit F8, IEPA Reuter Affidavit, September 2005 SOP Renewal Application]

In its September 2005 SOP Renewal Application, Nacme proposed a process rate of 750,000 tpy. [Exhibit F8, IEPA Reuter Affidavit – September 2005 State Operating Permit Renewal Application, page NMLP 0952]

In its September 2005 SOP Renewal Application, Nacme stated that the control efficiency of its scrubber was 99.90 % for particulate emissions and 99.90% for gaseous

emissions. [Exhibit F8, IEPA Reuter Affidavit - September 2005 SOP Renewal Application, NMLP 0950]

In its September 2005 SOP Renewal Application, Nacme proposed the basis of its controlled HCL air emissions to be calculated utilizing its SOP Emission Factor and its proposed 750,000 tpy process rate, instead of basing it on the most recent emission factor and process rate that resulted from the April 2002 Stack Test. [Exhibit F8, IEPA Reuter Affidavit - September 2005 SOP Renewal Application, page NMLP 0953; Exhibit F1, IEPA Reuter Affidavit - Nacme's SOP, page 1, ¶2; Exhibit F4, IEPA Reuter Affidavit - April 2002 Stack Test, pages NMLP 0402, 0406 and 0408; Exhibit E, IEPA Brodsky Affidavit, ¶¶6 and 5; and Exhibit F9, IEPA Reuter Affidavit - September 2005 Notice of Incompleteness, page 1, ¶2]

On September 20, 2005, the Agency issued a Notice of Incompleteness to Nacme's September 2005 SOP Renewal Application for Nacme's failure to substantiate the proposed permit emission factor of 4.8 lbs/10³ tons with the results from the April 2002 Stack Test; the emissions factor derived from the April 2002 Stack Test was 6.51 lbs/10³ Tons. [Exhibit F9, IEPA Reuter Affidavit - September 2005 Notice of Incompleteness, page 1, ¶2; Exhibit F4, IEPA Affidavit - April 2002 Stack Test, pages NMLP 0402, 0406 and 0408; and Exhibit E, IEPA Brodsky Affidavit, ¶5 and 6]

In the September 2005 Notice of Incompleteness, the Agency notified Nacme that it required a construction permit because Nacme's September 2005 SOP Renewal Application proposed a Process Modification when it proposed a change in process rate to 750,000 tpy from the process rate of 292,000 tpy that was the result of Nacme's April

⁷ April 2002 Stack Test resulted in a $6.51 \, \mathrm{lbs/10^3}$ tons of steel emission factor and a 33.3 tph process rate. [See Exhibit E, IEPA Brodsky Affidavit, ¶¶5 and 3]

2002 Stack Test.⁸ [Exhibit C, Nacme's Admission of Facts, Fact 9; Exhibit F9, IEPA Reuter affidavit –September 2005 Notice of Incompleteness, page 1, ¶1; Exhibit E, IEPA Brodsky Affidavit, ¶¶7 and 8]

In the September 2005 Notice of Incompleteness, the Agency notified Nacme that the Agency had determined that the estimated PTE for the HCL air emissions at the Facility was greater than 10 tpy of HCL from a single source. [Exhibit F9, IEPA Affidavit - September 2005 Notice of Incompleteness, page 1, ¶3] The Agency calculated the HCL PTE air emissions from information provided in Nacme's September 2005 SOP Renewal Application; specifically, Nacme's April 2002 Stack Test results show a PTE greater than 10 tpy of HCL from a single source. [Exhibit F9, IEPA Affidavit - September 2005 Notice of Incompleteness, page 1, ¶3; Exhibit E, IEPA Brodsky Affidavit, ¶¶4 and 10; 2005 FESOP Application, page NMLP 0291]

Accordingly, in the September 2005 Notice of Incompleteness, the Agency informed Nacme in writing that the Facility was operating as a major source and required a CAAPP permit or, alternatively, a FESOP. [Exhibit F9, IEPA Reuter Affidavit - September 2005 Notice of Incompleteness, Pages 1, ¶3]

On October 18, 2005, Nacme submitted to the Agency its 2005 FESOP

Application. [Exhibit C, Nacme's Admission of Facts, Fact 16; Exhibit F10, IEPA

Reuter Affidavit - 2005 FESOP Application] In its 2005 FESOP Application, Nacme

proposed a process rate of 750,000 tpy, which was previously permitted by its 2002

Construction Permit, but for stack testing only, and which was greater than the process

rate of 600,000 tpy permitted in Nacme's SOP or 292,000 tpy resulting from Nacme's

April 2002 Stack Test. [Exhibit C, Nacme's Admission of Facts, Fact 9; Exhibit F10,

^{8 292,000} tpy, See FN 6.

IEPA Reuter Affidavit - 2005 FESOP Application, HAP Emissions Summary, page 6-2 (NMLP 0311); Exhibit F3, IEPA Reuter Affidavit - 2002 Construction Permit, page 1, ¶1; Exhibit F1, IEPA Reuter Affidavit - Nacme's SOP, page 1, ¶2]

On December 6, 2005, the Agency issued a notice of completeness determination of Nacme's 2005 FESOP Application ("December 2005 Notice"). [Exhibit F11, IEPA Reuter Affidavit – December 2005 CAAPP Application Completion Determination] In addition, in the December 2005 Notice, the Agency informed Nacme that "notwithstanding the completeness determination, the Agency may request additional information necessary to evaluate or take final action on the FESOP application." [Exhibit F11, IEPA Reuter Affidavit – December 2005 CAAPP Application Completion Determination, page 1, ¶3]

In December 2005, the Agency informed Nacme that it could issue a FESOP with an HCL air emissions process rate no greater than 33.3 tph pursuant to its April 2002 Stack Test results but not at the HCL air emissions process rate of 85.6 tph proposed in Nacme's 2005 FESOP Application. [Exhibit E, IEPA Brodsky Affidavit, ¶7; Exhibit F14, IEPA Reuter Affidavit – 2007 FESOP Application, page NMLP 0271, ¶2] Additionally, the Agency informed Nacme that it was required to submit a construction permit before the Agency could approve the change in process rate. [IEPA Brodsky Affidavit, ¶8]

Nacme admits that the Process Modification request in its 2005 FESOP

Application and 2007 FESOP Application are modifications in its operation and that a modification in the existing operation requires a construction permit. [Wenzel Deposition, pages 22, 48, 78-79]

^{9 33.3} tph = 292,000 tpy; 85.6 tph = 750,000 tpy. [IEPA Brodsky Affidavit, ¶10]

On December 21, 2006, Nacme conducted its December 2006 Stack Test.

[Exhibit B, Answer ¶18] The test resulted in an HCL air emissions process rate of

119.9983 tph. [Exhibit F13, IEPA Reuter Affidavit – 2007 FESOP Application, page 2,

¶3; and Exhibit F12, IEPA Reuter Affidavit – December 2006 Stack Test, Test Results

Summaries page NMLP 0026]

On March 23, 2007, Nacme submitted its 2007 FESOP Application with a proposed Process Modification to operate at a process rate of 119.9983 tph, which exceeds the process rate of 69 tph of Nacme's SOP, it's most recent operating permit.

[See Exhibit C, Nacme Admission of Facts, Fact 11; Exhibit F1, IEPA Reuter Affidavit – Nacme's SOP, page 2, ¶3; Exhibit F13, IEPA Reuter Affidavit – 2007 FESOP Application, page 2, ¶3; Exhibit E, IEPA Brodsky Affidavit, ¶10]

From December 2005 through at least January 24, 2012, when Nacme met with the People in a litigation prefiling meeting, the Agency requested Nacme submit a construction permit for the Process Modification requested in its 2007 FESOP Application. [See Exhibit E, IEPA Brodsky Affidavit, ¶8]

On or about February 12, 2012, Nacme submitted a construction permit application requesting the process modification of 120 tph, which was equivalent to the Process Modification requested in its 2007 FESOP Application. [See Exhibit E, IEPA Brodsky Affidavit, ¶9]

On April 26, 2012, the Agency issued the 2012 Construction Permit for the Facility with special condition 1c authorizing Nacme to operate at the Facility with the proposed Process Modification until the Agency took final action on the 2007 FESOP Application. [Exhibit F13, IEPA Reuter Affidavit – 2007 FESOP Application]

IV. LEGAL STANDARD FOR SUMMARY JUDGMENT

Section 101.516(b) of the Board's Procedural Regulations, 35 Ill. Adm. Code 101.516(b), provides as follows:

b) If the record, including pleadings, depositions and admissions on file, together with any affidavits, shows that there is no genuine issue of material fact, and that the moving party is entitled to judgment as a matter of law, the Board will enter summary judgment.

Section 2-1005 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-1005 (2012), provides, in relevant part, as follows:

Summary Judgments

(a) For Complainant. Any time after the opposite party has appeared or after the time which he or she is required to appear has expired, a Complainant may move with or without supporting affidavits for a summary judgment in his or her favor for all or part of the relief sought.

Summary judgment is appropriate when the pleadings and depositions, together with any affidavits and other items in the record, show that there is no genuine issue of material fact and that the moving party is entitled to judgment as a matter of law. (citing Dowd & Dowd, Ltd. v. Gleason, 181 Ill. 2d 460, 693 N.E.2d 358 (1998).

The purpose of the summary judgment procedure is to aid in the expeditious resolution of a lawsuit. *Atwood v. St. Paul Fire & Marine Ins. Co.*, 363 Ill.App.3d 861, 863, 845 N.E.2d 68, 70 (2d Dist. 2006), *Olson v. Etheridge*, 177 Ill.2d 396, 404, 686 N.E.2d 563, 566 (1997). The purpose of a summary judgment proceeding is not to try an issue of fact, but to determine whether any genuine issue of material fact exists. *Happel v. Wal-Mart Stores, Inc.*, 199 Ill.2d 179, 186, 766 N.E.2d 1118, 1123 (2002). The use of summary judgment is encouraged under Illinois law. *Bolingbrook Equity I Limited*

Partnership v. Zayre of Illinois, Inc., 252 Ill.App.3d 753, 764, 624 N.E.2d 1287, 1295 (1st Dist. 1993).

A motion for summary judgment should be granted when the pleadings and affidavits reveal that there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law. *Balla v. Gambro, Inc.*, 145 Ill.2d 492, 508, 584 N.E.2d 104, 112 (1991).

In moving for summary judgment, the People rely, in part, on Respondent's admissions of certain material facts in its Answer and Response to Complainant's Requests to Admit. The Board's Procedural Regulations, 35 Ill. Adm. Code 101.516(b), and Supreme Court Rule 216 plainly allow requests for admission of any fact which is relevant, and ultimate facts fall within this broad category, *P.R.S. Int'l., Inc. v. Shred Pax Corp.*, 184 Ill.2d 224, 236, 703 N.E.2d 71, 77 (1998).

Given the proffered evidence and Respondent's material admissions, the legal and factual bases for the People's theories of liability are set forth as follows:

V. ARGUMENT-NO GENUINE ISSUE OF MATERIAL FACT

The Complaint and Answer filed in this cause, and Nacme's Response to the State's Requests to Admit, together with the People's affidavits, IEPA Brodsky's Affidavit and IEPA Reuter Affidavit, supporting this motion, establish all undisputed material facts necessary to prove Nacme violated Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010). Respondent's operations at the Facility are subject to the Act and the rules and regulations promulgated by the Board and the Agency. Accordingly, because there is no genuine issue as to any

material fact, the Complainant is entitled to summary judgment as a matter of law on Count I:

Summary Judgment as to Sections 9(b), 39.5(5)(x), and 39.5(6)(b) of the Act alleged: Nacme operated a CAAPP Facility and equipment without a CAAPP or FESOP permit

Complainant realleges and incorporates by reference into its Motion for Summary

Judgment on Count I the foregoing sections of this Complainant's Motion for Summary

Judgment entitled "Procedural History," "Statement of Undisputed Facts," and "Legal

Standard."

From at least April 16, 2002 through at least February 11, 2012, Respondent operated pickling operations at its Facility, a major source for HCL air emissions, without a Title V CAAPP permit or, in the alternative, a FESOP. In fact, by Nacme's own attestation in its 2005 FESOP Application, 2007 FESOP Application, and 2012 Construction Permit submitted to the Agency, Nacme admits that the Facility's PTE for HCL, a HAP, air emissions have been and are greater than 10 tpy and that each of the aforementioned FESOP applications relied on one of following stack test results for the Facility: April 2002 Stack Test and December 2006 Stack Test. Accordingly, Nacme's FESOP applications are admissions that its Facility was a "major source" and required a FESOP permit to operate its Facility from at least April 16, 2002, when Nacme's April 2002 Stack Test results demonstrated the PTE of HCL, a HAP, at the Facility was 10 tpy or greater, through at least February 11, 2012, when the Agency received Nacme's 2012 Construction permit.

Additionally, the facts clearly show that Nacme's SOP was not a CAAPP, or in the alternative, a FESOP, that permitted Nacme, a "major source," to conduct pickling

operations at the Facility from at least April 16, 2002 through at least February 11, 2012. In fact, when Nacme failed to submit a CAAPP application after it learned from the results of the April 2002 Stack Test that its Facility was a "major source" for HCL air emissions, Nacme was no longer permitted to conduct pickling operations at is Facility.

In Count I of the Complaint, the People seek a finding that the Respondent violated Sections 9(b), 39.5(5)(x), and 39.5(6)(b) of the Act, 415 ILCS 5/9(b), 39.5(6)(b), 39.5(5)(x), and (2010), which provide as follows:

Section 9(b) of the Act, 415 ILCS 5/9(b) (2010), provides as follows:

No person shall:

(b) Construct, install, or operate any equipment, facility, vehicle, vessel, or aircraft capable of causing or contributing to air pollution or designed to prevent air pollution, of any type designated by Board regulations, without a permit granted by the Agency, or in violation of any conditions imposed by such permit;

Section 39.5(6)(b) of the Act, 415 ILCS 5/39.5(6)(b) (2010), provides as follows:

Prohibition

After the applicable CAAPP permit or renewal application submittal date, as specified in subsection 5 of this Section, no person shall operate a CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such a source has been timely submitted to the Agency.

Section 39.5(5) of the Act, 415 ILCS 5/39.5(5) (2010), provides, in pertinent part, as follows:

Applications and Completeness.

x. ... The owner or operator of an existing source that has been excluded from the provisions of this Section under subsection 1.1 or paragraph (c) of subsection 3 of this Section and that becomes

subject to the CAAPP solely due to a change in operation at the source shall submit its complete CAAPP application consistent with this subsection at least 180 days before commencing operation in accordance with the change in operation.

Section 39.5(2) of the Act, 415 ILCS 5/39.5(2) (2010), provides, in pertinent part, as follows:

Applicability

- a. Sources subject to this Section shall include:
 - i. Any major source as defined in paragraph (c) of this subsection.
- c. For purposes of this Section the term "major source" means any source that is:
 - i. A major source under Section 112 of the Clean Air Act, which is defined as:
 - A. For pollutants other than radionuclides, any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit, in the aggregate, 10 tons per year (tpy) or more of any hazardous air pollutant which has been listed pursuant to Section 112(b) of the Clean Air Act, 25 tpy or more of any combination of such hazardous air pollutants, or such lesser quantity as USEPA may establish by rule.

Section 39.5(3) of the Act, 415 ILCS 5/39.5(3) (2010), provides, in pertinent part, as follows:

Agency Authority to Issue CAAPP Permits and Federally Enforceable State Operating Permits.

c. The Agency shall have the authority to issue a State operating permit for a source under subsection (a) of Section 39 of this Act, as amended, and regulations promulgated thereunder, which includes federally enforceable conditions limiting the "potential to emit" of the source to a level below the major source threshold for

that source as described in paragraph (c) of subsection 2 of this Section, thereby excluding the source from the CAAPP, when requested by the applicant pursuant to paragraph (u) of subsection 5 of this Section.

Section 3.315 of the Act, 415 ILCS 5/3.315 (2010), provides the following definition:

"PERSON" is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

Section 3.165 of the Act, 415 ILCS 5/3.165 (2010), provides the following definition:

"CONTAMINANT" is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

Section 3.115 of the Act, 415 ILCS 5/3.115, provides the following definition:

"AIR POLLUTION" is the presence in the atmosphere of one or more contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life, to health, or to property, or to unreasonably interfere with the enjoyment of life or property. 415 ILCS 5/3.115 (2010)

Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010), provides, in pertinent part, the following definitions:

"CAAPP" means the Clean Air Act Permit Program developed pursuant to Title V of the Clean Air Act.

"CAAPP PERMIT"... means any permit issued, renewed, amended, modified, or revised pursuant to Title V of the Clean Air Act.

"CAAPP SOURCE" means any source for which the owner or operator is required to obtain a CAAPP permit pursuant to subsection 2 of this Section.

"OWNER OR OPERATOR" means any person who owns, leases, operates, controls, or supervises a stationary source.

"POTENTIAL TO EMIT" means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by USEPA. This definition does not alter or affect the use of this term for any other purposes under the Clean Air Act, or the term "capacity factor" as used in Title IV of the Clean Air Act or the regulations promulgated thereunder.

"SOURCE" means any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and are under common control of the same person or persons under common control) and that belongs to a single major industrial grouping....

"STATIONARY SOURCE" means any building, structure, facility, or installation that emits or may emit any regulated air pollutant....

"REGULATED AIR POLLUTANT" means the following:

(5) Any pollutant subject to a standard promulgated under Section 112 or other requirements established under Section 112 of the Clean Air Act,

Section 112(a) (6) of the Clean Air Act, 42 USC 7412(a)(6), provides, in pertinent part, the following definition:

(6) Hazardous air pollutant

The term "hazardous air pollutant" means any air pollutant listed pursuant to subsection (b) of this section.

Section 112(b) (List of Pollutants) of the Clean Air Act, 42 USC 12(b)(1), provides, in pertinent part, the following:

(1) Initial list

The Congress establishes for purposes of this section a list of hazardous air pollutants as follows:

Hydrochloric acid

NACME is a "person."

Nacme was and is a limited liability company and, therefore, a "person" as that term is defined under Section 3.315 of the Act, 415 ILCS 5/3.315 (2010).

2. HCL is a "contaminant", "regulated air pollutant" and "hazardous air pollutant" whose presence in the atmosphere is "air pollution."

HCL volatilizes as a gas and particulate matter in air emissions at the Facility and is therefore, a "contaminant" as that term is defined under Section 3.165 of the Act, 415 ILCS 5/3.165 (2010). HCL is a "hazardous air pollutant" ("HAP") and a "regulated air pollutant," as those terms are defined by Section 112(b) (List of Pollutants) of the Clean Air Act, 42 USC 12(b)(1), and Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010), respectively. Accordingly, in sufficient quantities and of such characteristics and duration, HCL is injurious to human, plant, or animal life, to health, to property, and unreasonably interferes with the enjoyment of life or property, and, therefore, constitutes "air pollution" as that term is defined under Section 3.115 of the Act, 415 ILCS 5/3.115.

The operation of equipment at the Facility is capable of causing or contributing to air pollution or designed to prevent air pollution.

From April 16, 2002 through February 11, 2012, four (4) pickling tanks enclosed in a turbo tunnel enclosure, and a four (4) stage washer containing HCL, operating at the Facility have been and are equipment capable of emitting HCL emissions and causing or

contributing to air pollution. The scrubber and the TurboTunnel enclosure that capture air emissions from operations of the washing and pickling process have been and are equipment used to prevent HCL air emissions, a HAP and contaminant, from the Facility.

4. The Facility is a "source" and "stationary source" as those terms are defined in Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010), and a "major source" as that term is defined in Section 39.5(2)(c) of the Act, 415 ILCS 5/39.5(2)(c) (2010).

The Nacme Facility, which emits HCL air emissions, a HAP, and "regulated air pollutant," is a "stationary source" and "source" as those terms are defined under Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010). Beginning on at least April 16, 2002, when Nacme conducted its April 2002 Stack Test at the Facility that resulted in a change in Nacme's previously reported PTE of a single HAP, HCL, to greater than 10 tpy, through February 11, 2012, when Nacme submitted its CAAPP Construction Permit Application, the Facility was and is a "major source" as that term is defined under Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010).

5. Nacme failed to apply for and submit an application to the Agency for a CAAPP or, alternatively, a FESOP, at least 180 days before commencing operation in accordance with the change in operation at the Facility.

As a major source since at least April 16, 2002, Nacme was required to apply for and submit an application to the Agency for a CAAPP or, alternatively, a FESOP, at least 180 days before commencing operation in accordance with the change in PTE of its HCL emissions at the Facility. The Illinois EPA received Nacme's initial complete application for a FESOP on October 18, 2005, more than 3 years and 6 months after the Facility became a major source.

6. Nacme operated a CAAPP source without a CAAPP permit or timely submitting a complete CAAPP permit application for a major source to the Agency.

From at least April 16, 2002 through at least February 11, 2012, Nacme continued operating the Facility without a CAAPP or FESOP permit issued by the Agency. On December 6, 2005, the Agency responded to Nacme's 2005 FESOP Application with a request for additional information; specifically, the Agency requested Nacme to submit a construction permit application for the Process Modification it proposed in its 2005 FESOP Application. The plain language of the Section 201.102 of the Illinois Pollution Control Board's Regulations, 35 Ill. Adm. Code 201.102, states that increasing output is a Modification:

"Modification": any physical change in, or change in the method of operations of, an emission source or of air pollution control equipment which increases the amount of any specified air contaminant emitted by such source or equipment or which results in the emission of any specified air contaminant not previously emitted. It shall be presumed that an increase in the use of raw materials, the time of operation or the rate of production will change the amount of any specified air contaminant emitted. Emphasis added.

Nacme admits that it intentionally did not provide the construction permit application as requested by the Agency because Nacme claims that a construction permit is not required for its FESOP applications. Yet, Nacme admits that the Process Modification is a modification and that modifications require a construction permit application. Thus, a construction permit is plainly required by law for the Agency to permit an increase in the maximum annual steel throughput permitted in Nacme's SOP, its most recent permit at the time of Nacme proposed the Process Modification it its 2005 FESOP Application and 2007 FESOP Application. Nevertheless, Nacme failed to submit a construction permit for over 6 years, even after several notifications from the Agency of its noncompliance

and the need to submit a construction permit application to obtain a FESOP with the Process Modification Nacme proposed.

By operating a major source without timely submitting an application within at least 180 days before commencing operation as a major source, and by operating a "major source" without a CAAPP permit, Nacme violated Section 39.5(5)(x) of the Act, 415 ILCS 5/39.5(5)(x) (2010), and, thereby, violated Sections 39.5(6)(b) and 9(b) of the Act, 415 ILCS 5/39.5(6)(b) and 9(b) (2010).

VI. RELIEF REQUESTED

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, prays for the entry of summary judgment in its favor and against NACME STEEL PROCESSING, LLC on Count I of the Complaint for the reason that the pleadings, judicial admissions on file, and affidavits show that there is no genuine issue as to any material fact and that the People are entitled to summary judgment as a matter of law. Specifically, Complainant seeks an order:

- 1. Finding that Nacme violated Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010);
- 2. Ordering Nacme to cease and desist from any further violation of Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010);
- 3. Assessing against Nacme a civil penalty of One Hundred Thousand dollars (\$100,000.00);
- 4. Ordering Nacme to pay all costs of this action, including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

Granting such other relief as this Board deems appropriate and just.

VI. REMEDY

Section 2(b) of the Act, 415 ILCS 5/2(b)(2010), provides:

It is the purpose of this Act, as more specifically described in later sections, to establish a unified, state-wide program supplemented by private remedies, to restore, protect and enhance the quality of the environment, and to assure that adverse effects upon the environment are fully considered and borne by those who cause them. (emphasis added)

Impact on the Public Resulting from Respondent's Alleged Non-Compliance

Section 33(c) of the Act, 415 ILCS 5/33(c) (2006), provides as follows:

In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:

- the character and degree of injury to, or interference with the protection of the health, general welfare and physical property of the people;
- the social and economic value of the pollution source;
- the suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area involved;
- the technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source; and
- 5. any subsequent compliance.

In response to these factors, the Complainant states the following:

The impact to the public resulting from Respondent's failure to timely
apply for a CAAPP when it knew or should have known it was a "major soure" in
connection with the pickling operations at its Facility resulted in the threat of air pollution

of HCL air emissions, a HAP, which threatened human health and the environment.

Accordingly, the Illinois EPA's information gathering responsibilities were hindered by the Respondent's violations thereby threatening human health and the environment.

- 2. There is social and economic benefit to the facility.
- 3. Operation of the facility is suitable for the area in which it occurs.
- 4. Submitting a timely FESOP application prior to becoming a major source by changing operations at the site is both technically practicable and economically reasonable.
- 5. Respondent has subsequently complied with the Act and the Board regulations.

A civil penalty should be assessed against Nacme because of the potentially severe impact the threat of exposure to HCL air emissions, a HAP, had on human health and the environment.

Explanation of Civil Penalties Requested

Section 2(b) of the Act, 415 ILCS 5/2(b) (2006), provides:

It is the purpose of this Act, as more specifically described in later sections, to establish a unified, state-wide program supplemented by private remedies, to restore, protect and enhance the quality of the environment, and to assure that adverse effects upon the environment are fully considered and borne by those who cause them. (Emphasis added.)

The principal reason for penalties for violations of the Act is to aid in enforcement. Punitive considerations are secondary. *Tri-County Landfill Company v. Illinois Pollution Control Board*, 41 Ill.App.3d 249, 353 N.E.2d 316, 325 (2nd Dist. 1976). The Board does grant motions for summary judgment and rules on civil penalties without sending the case to hearing. *See e.g. People v. Zachary Isaac et al*, PCB 11-58

(Sept. 20, 2012); see also People v. Byrom Ward et al, PCB 10-72 (July 7, 2011 and Nov. 17, 2011) (no hearing was held, but parties were asked to brief the issue of civil penalties), People v. Roxana Landfill, Inc., PCB 12-123 slip op at 5 (May 3, 2012); People v. Ogoco, Inc., PCB 06-16 (Sept. 21, 2006); People v. Steve's Concrete & Excavating, PCB 08-87 (Mar. 5, 2009); People v. Payne Rogers & Black Gold International, PCB 00-127 (Aug. 9, 2001).

Section 42(a) of the Act, 415 ILCS 5/42(a) (2010), provides in pertinent part, as follows:

a) Except as provided in this Section, any person that violates any provision of this Act or any regulation adopted by the Board, or any permit or term or condition thereof, or that violates any order of the Board pursuant to this Act, shall be liable for a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues;

Section 42 of the Act provides guidance for calculating civil penalties for violations of the Act. The statutory maximums provided in the Act have been used as "a natural or logical benchmark from which to begin considering factors in aggravation and mitigation of the penalty amounts." *Illinois EPA v. Allen Barry*, Individually and d/b/a Allen Barry Livestock, 1990 WL 271319, 48 (Slip Op. May 10, 1990, PCB. 88-71).

Assuming for the sake of civil penalties calculation that the Respondent's violations of the statutory provisions alleged in the Complaint were committed from October 26, 2005 through January 31, 2012, the maximum statutory civil penalties that Section 42 of the Act, 415 ILCS 5/42 (2010) authorizes for these violations is \$69,120,000.00. The statutory maximum is calculated as follows:

Count I

1 violation of Section 39.5(5)(x) of the Act Duration of 2299 days 10/26/2005-2/11/2012		\$50,000.00 \$22,990,000.00
1 violation of Section 39.5(6)(b) of the Act Duration of 2299 days 10/26/2005-2/11/2012		\$50,000.00 \$22,990,000.00
1 violation of Section 9(b) Duration of 2299 days 10/26/2005-2/11/2012		\$50,000.00 \$22,990,000.00
	Total	\$69,120,000.00

Assuming for the sake of civil penalties calculation that the Respondent's violations of the statutory provisions alleged in the Complaint were committed from April 16, 2002 through February 11, 2012, the maximum statutory civil penalties that Section 42 of the Act, 415 ILCS 5/42 (2010) authorizes for these violations is \$107,730,000.00. The statutory maximum is calculated as follows:

Count I

	Total	\$107,730,000.00
1 violation of Section 9(b) Duration of 3586 days 4/16/2002-2/11/2012		\$50,000.00 \$35,860,000.00
1 violation of Section 39.5(6)(b) of the Act Duration of 3586 days 4/16/2002-2/11/2012		\$50,000.00 \$35,860,000.00
1 violation of Section 39.5(5)(x) of the Act Duration of 3586 days 4/16/2002-2/11/2012		\$50,000.00 \$35,860,000.00

Consideration of Section 42(H) Factors

Section 42(h) of the Act, 415 ILCS 5/42(h) (2010), provides:

In determining the appropriate civil penalty to be imposed under ..., the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

- 1. the duration and gravity of the violation;
- the presence or absence of due diligence on the part of Nacme in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;
- any economic benefits accrued by Nacme because of delay in compliance with requirements, in which case the economic benefits shall be determined by the lowest cost alternative for achieving compliance;
- the amount of monetary penalty which will serve to deter further violations by Nacme to otherwise aid in enhancing voluntary compliance with this Act by the violator and other persons similarly subject to the Act;
- the number, proximity in time, and gravity of previously adjudicated violations of this Act by the violator.
- whether Nacme voluntarily self-disclosed, in accordance with Subsection (i) of this Section, the non-compliance to the Agency; and
- 7. whether Nacme has agreed to undertake a "supplemental environmental project," which means an environmentally beneficial project that Nacme agrees to undertake in settlement of an enforcement action brought under this Act, but which Nacme is not otherwise legally required to perform.

In response to these factors, the Complainant states as follows:

1. The duration of the violations that are the subject of the Complaint are alleged by the People to have occurred at a minimum of a nearly ten year period from at least April 16, 2002 through February 11, 2012. The gravity of the alleged violation is egregious because of the length of time Nacme operated without the requisite CAAPP, despite the fact that it was a "major source" for air emissions of HCL as determined during its April 2002 Stack Test, and the several requests to Nacme from the Agency during this time period to provide a construction permit to the Agency so it could approve

and issue a FESOP based on Nacme's proposed Process Modifications in its FESOP applications.

On December 6, 2005, the Agency responded to Nacme's 2005 FESOP

Application with a request for additional information; specifically, that Nacme submit a construction permit application for the Process Modification it was requesting in its 2005 FESOP Application. The plain language of the Act states that increasing of steel throughput is a modification. Nacme admits that it intentionally did not provide the construction permit application as requested by the Agency, even though the plain language of the law is clear for Nacme's proposed Process Modification. Nacme failed to submit a construction permit application for over 6 years after several notifications from the Agency of its noncompliance.

In addition, the April 2002 Stack Test conducted at Nacme's Facility demonstrated that PTE HCL air emissions were greater than 10 tpy, qualifying the Facility as a "major source" that required a CAAPP to operate. At no time before October 18, 2005, did Nacme submit a CAAPP application to operate its Facility.

2. For the aforesaid reasons in subsection 1 of this section, Nacme failed to demonstrate diligence toward returning to compliance after failing to submit a CAAPP application 3 ½ years after its April 2002 Stack Test resulted in PTE HCL air emission exceeding 10 tpy and, failing to submit a construction permit from October 2005 through January 2012, despite several requests by the Agency to submit a construction permit application. In fact Nacme outright refused to submit a construction permit application until it was notified of an impending lawsuit against the Respondent for noncompliance with the CAAPP.

- There was no economic benefit resulting from the violations of the Complaint.
- 4. Although the maximum civil penalties is at least \$107,730,000.00, the People believe that \$100,000, less than .001% of the statutory maximum, is appropriate for the type of operations and the violations alleged in the Complaint and will serve to deter further violations by Nacme and other persons similarly subject to the Act and the Board Regulations, and otherwise aid in enhancing voluntary compliance with the Act and the Board Regulations.
- To Complainant's knowledge, Nacme has had no previously adjudicated violations of the Act.
- 6. There was no self-disclosure by Respondent. In fact, Nacme intentionally chose not to comply with the Agency's repeated requests for a construction permit application required to issue the permit with the process rate Nacme proposed in its 2005 FESOP Application. Additionally, Nacme knew or should have known its PTE HCL air emissions during its April 2002 Stack Test exceeded 10 tpy and was negligent in applying for a CAAPP permit at that time.
- a supplemental environmental program is not relevant where settlement is not being proffered.

These aggravating and mitigating factors provide guidance to the Board in determining the appropriate amount of a civil penalty in an environmental enforcement case. Accordingly, the People bring these factors to the Board's attention and request a civil penalty of \$100,000.

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board grant its Motion for Summary Judgment against Nacme on Count I by finding Nacme violated Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010), award a civil penalty of \$100,000, and take such other action as the Board believes to be appropriate and just.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS by LISA MADIGAN Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief Environmental Enforcement/Asbestos Litigation Division

ELIZABETH WALLACE, Chief Environmental Bureau Assistant Attorney General

BY:

Nancy J. Tikalsky

Assistant Attorney General Environmental Bureau North 69 W. Washington, Suite 1800 Chicago, Illinois 60602

(312) 814-0608

Dated: May 16, 2014

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
Complainant,)	
v.)))	PCB No. 13 - 12 (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,))	(
Respondent.)	

EXHIBIT A

COMPLAINT

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 13-) (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,)))
Respondent.)

NOTICE OF ELECTRONIC FILING

TO: Edward V. Walsh, III
ReedSmith LLP
10 South Wacker Drive
Chicago, Illinois 60606-7507

PLEASE TAKE NOTICE that today, September 5, 2012, I have filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following Complaint a true and correct copy of which is attached and hereby served upon you.

Pursuant to 35 Ill. Adm. Code 103.204(f), I am required to state that failure to file an answer to this Complaint within 60 days may have severe consequences. Failure to answer will mean that all allegations in the Complaint will be taken as if admitted for purposes of this proceeding. If you have any questions about this procedure, you should contact the hearing officer assigned to this proceeding, the Clerk's Office or an attorney.

CERTIFICATE OF SERVICE

I, Nancy J. Tikalsky, an Assistant Attorney General, do certify that a true and correct copy of the Complaint and Notice of Filing were sent by certified mail with return receipt requested to the persons listed on the Notice of Filing on September 5, 2012.

BY:

VANCALI

NOTIFICATION

YOU ARE HEREBY NOTIFIED that financing may be available through the Illinois Environmental Facilities Financing Act (20 ILCS 3515/1 et seq.) to correct the alleged pollution.

THIS FILING IS SUBMITTED ON RECYCLED PAPER

PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois

BY:

Assistant Attorney Genera

Assistant Attorney General Environmental Bureau

69 W. Washington St., Suite 1800

Chicago, Illinois 60602

(312) 814-8567

Date: September 5, 2012

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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)	
)	PCB No. 13- (Enforcement – Air)
)	(Emoreoment 1111)
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)	
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COMPLAINT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, on her own motion and at the request of the Illinois Environmental Protection Agency ("Illinois EPA"), complains of Respondent, Nacme Steel Processing, LLC ("Nacme"), as follows:

COUNT I

OPERATING A MAJOR STATIONARY SOURCE WITHOUT A CAAPP PERMIT

- 1. This count is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, on her own motion and at the request of the Illinois EPA, pursuant to Section 31 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(2010).
- 2. The Illinois EPA is an agency of the State of Illinois created by the Illinois General Assembly in Section 4 of the Act, 415 ILCS 5/4 (2010), and charged, *inter alia*, with the duty of enforcing the Act.
- 3. At all times relevant to this complaint, Respondent has been and is a Delaware limited liability corporation in good standing and duly authorized to do

business in the State of Illinois. Nacme owns and operates a steel processing facility located at 429 West 127th Street, Chicago, Cook County, Illinois ("Facility").

- 4. At the Facility, Nacme operates a ninety (90) ton per hour continuous coil pickling line, comprised of four (4) pickling tanks enclosed in a turbo tunnel enclosure, and a four (4) stage washer. Emissions from the tanks and washers are vented to a Pro-Eco four tray scrubber ("scrubber").
- 5. The pickling tanks, which are heated to approximately 190 degrees Fahrenheit, utilize hydrochloric acid ("HCL") at various concentrations in a dissolution process to remove impurities from hot rolled steel ("pickling"). After pickling, the steel goes through an aqueous based four stage washer ("washing").
- 6. During the pickling and washing, air emissions are captured in ducts and transported via piping to the scrubber. Additionally, pickling and washing tanks containing the HCL are equipped with covers to minimize exposure of HCL to the atmosphere when not in use.
- 7. On February 8, 2001, the Illinois EPA issued Nacme State Operating
 Permit No. 96020074 ("SOP") for control of its air emissions at the Facility. The SOP
 expired on October 25, 2005.
- 8. On April 12, 2002, the Illinois EPA issued revised construction permit No. 01040081 to Nacme for the installation of an emissions tunnel which required retesting of the modified steel pickling process and allowed Nacme to operate its steel pickling process with a rate greater than that allowed by the SOP for the purposes of stack testing only.

- 9. On April 16, 2002, Nacme conducted a stack test at its Facility ("April 2002 stack test"). The April 2002 stack test was based on a maximum steel process rate lower than the permitted steel process rate of Nacme's SOP and resulted in emissions greater than allowed by its SOP.
- 10. On April 4, 2005, Nacme submitted its SOP renewal application to the Illinois EPA ("April 2005 SOP renewal application").
- On April 13, 2005, the Illinois EPA issued a Notice of Incompleteness to Nacme's April 2005 SOP renewal application for failure to provide a potential to emit ("PTE") calculation for HCL and to demonstrate eligibility for a state operating permit.
- 12. On September 12, 2005, Nacme submitted a second application for renewal of its SOP ("September 2005 SOP renewal application").
- 13. On September 20, 2005, the Illinois EPA issued a Notice of Incompleteness ("September 2005 Notice") to Nacme's September 2005 SOP renewal application for Nacme's failure to substantiate the requested permit limits with any stack testing results.
- 14. Additionally, Nacme was notified in the September 2005 Notice that it required a construction permit because its September 2005 SOP renewal application requested a modification consisting of an increase in the maximum steel process rate allowed by its SOP.
- 15. Finally, the Illinois EPA notified Nacme in its September 2005 Notice that Illinois EPA had determined that the estimated PTE for the HCL emissions at the Facility based on information provided in Nacme's September 2005 SOP renewal application was greater than 10 tons per year ("tpy") of HCL from a single source. Accordingly, Illinois

EPA informed Nacme in writing that it required a Clean Air Act Permit Program ("CAAPP") permit or, alternatively, a Federally Enforceable State Operating Permit ("FESOP").

- 16. On October 25, 2005, Nacme submitted to the Illinois EPA a CAAPP application with a request for a FESOP ("2005 FESOP application"). In its 2005 FESOP application, Nacme requested a maximum steel process rate greater than the maximum steel process rate allowed by Nacme's SOP.
- 17. On December 6, 2005, the Illinois EPA issued a notice of completeness determination of Nacme's FESOP application ("December 2005 Notice"). In addition, in the December 2005 Notice, the Illinois EPA informed Nacme that "notwithstanding the completeness determination, the Agency may request additional information necessary to evaluate or take final action on the FESOP application."
- 18. On December 21, 2006, Nacme conducted another stack test ("December 2006 stack test"). The test was conducted with a maximum steel process rate greater than the maximum steel process rate allowed by its SOP. Results of the test were reported to the Illinois EPA on February 2, 2007.
- 19. As of February 1, 2012, or a date better known to Respondents, Nacme has failed to submit a construction permit application for process modifications as an amendment to either its 2005 FESOP application or its 2007 FESOP application.

20. Section 9(b) of the Act, 415 ILCS 5/9(b) (2010), provides as follows:

No person shall:

- (b) Construct, install, or operate any equipment, facility, vehicle, vessel, or aircraft capable of causing or contributing to air pollution or designed to prevent air pollution, of any type designated by Board regulations, without a permit granted by the Agency, or in violation of any conditions imposed by such permit;
- 21. Section 3.315 of the Act, 415 ILCS 5/3.315 (2010), provides the following definition:

"Person" is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

- 22. Respondent is a "person" as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2010).
- 23. Section 3.165 of the Act, 415 ILCS 5/3.165 (2010), provides the following definition:

"CONTAMINANT" is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

24. HCL is a "contaminant" as that term is defined in Section 3.165 of the Act, 415 ILCS 5/3.165 (2010).

25. Section 3.115 of the Act, 415 ILCS 5/3.115 (2010), provides the following definition:

"AIR POLLUTION" is the presence in the atmosphere of one or more contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life, to health, or to property, or to unreasonably interfere with the enjoyment of life or property.

- 26. Because the Facility emits, or is capable of emitting, HCL, a contaminant, to the atmosphere, it is capable of causing or contributing to "air pollution" as that term is defined in Section 3.115 of the Act, 415 ILCS 5/3.115 (2010).
- 27. Section 39.5(6)(b) of the Act, 415 ILCS 5/39.5(6)(b) (2010), provides as follows:

Prohibition

After the applicable CAAPP permit or renewal application submittal date, as specified in subsection 5 of this Section, no person shall operate a CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such a source has been timely submitted to the Agency.

28. Section 39.5(5) of the Act, 415 ILCS 5/39.5(5) (2010), provides, in pertinent part, as follows:

Applications and Completeness.

x. ... The owner or operator of an existing source that has been excluded from the provisions of this Section under subsection 1.1 or paragraph (c) of subsection 3 of this Section and that becomes subject to the CAAPP solely due to a change in operation at the source shall submit its complete CAAPP application consistent with this subsection at least 180 days before commencing operation in accordance with the change in operation.

29. Section 39.5(2) of the Act, 415 ILCS 5/39.5(2) (2010), provides, in pertinent part, as follows:

Applicability

- a. Sources subject to this Section shall include:
 - i. Any major source as defined in paragraph (c) of this subsection.
- c. For purposes of this Section the term "major source" means any source that is:
 - i. A major source under Section 112 of the Clean Air Act, which is defined as:
 - A. For pollutants other than radionuclides, any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit, in the aggregate, 10 tons per year (tpy) or more of any hazardous air pollutant which has been listed pursuant to Section 112(b) of the Clean Air Act, 25 tpy or more of any combination of such hazardous air pollutants, or such lesser quantity as USEPA may establish by rule.
- 30. Section 39.5(3) of the Act, 415 ILCS 5/39.5(3) (2010), provides, in pertinent part, as follows:

Agency Authority to Issue CAAPP Permits and Federally Enforceable State Operating Permits.

c. The Agency shall have the authority to issue a State operating permit for a source under subsection (a) of Section 39 of this Act, as amended, and regulations promulgated thereunder, which includes federally enforceable conditions limiting the "potential to emit" of the source to a level below the major source threshold for that source as described in paragraph (c) of subsection 2 of this Section, thereby excluding the source from the CAAPP, when requested by the applicant pursuant to paragraph (u) of subsection 5 of this Section.

31. Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010), provides, in pertinent part, the following definitions:

"CAAPP" means the Clean Air Act Permit Program developed pursuant to Title V of the Clean Air Act.

"CAAPP PERMIT"... means any permit issued, renewed, amended, modified, or revised pursuant to Title V of the Clean Air Act.

"CAAPP SOURCE" means any source for which the owner or operator is required to obtain a CAAPP permit pursuant to subsection 2 of this Section.

"OWNER OR OPERATOR" means any person who owns, leases, operates, controls, or supervises a stationary source.

"POTENTIAL TO EMIT" means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by USEPA. This definition does not alter or affect the use of this term for any other purposes under the Clean Air Act, or the term "capacity factor" as used in Title IV of the Clean Air Act or the regulations promulgated thereunder.

"SOURCE" means any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and are under common control of the same person or persons under common control) and that belongs to a single major industrial grouping....

"STATIONARY SOURCE" means any building, structure, facility, or installation that emits or may emit any regulated air pollutant

"REGULATED AIR POLLUTANT" means the following:

(5) Any pollutant subject to a standard promulgated under Section 112 or other requirements established under Section 112 of the Clean Air Act,

32. Section 112(a) (6) of the Clean Air Act, 42 USC 7412(a)(6), provides, in pertinent part, the following definition:

(6) Hazardous air pollutant

The term "hazardous air pollutant" means any air pollutant listed pursuant to subsection (b) of this section.

33. Section 112(b) (List of Pollutants) of the Clean Air Act, 42 USC 12(b)(1), provides, in pertinent part, the following:

(1) Initial list

The Congress establishes for purposes of this section a list of hazardous air pollutants as follows:

Hydrochloric acid

- 34. HCL is a "hazardous air pollutant" ("HAP") and a "regulated air pollutant", as those terms are defined by Section 112(b) (List of Pollutants) of the Clean Air Act, 42 USC 12(b)(1), and Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010), respectively.
- 35. The Facility is a "source" and "stationary source," as those terms are defined in Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010).
- 36. Beginning on at least April 16, 2002, or on a date best known to Nacme, Nacme had changed its operations resulting in a PTE of a single HAP, HCL, of greater than 10 tpy, the major source threshold. Accordingly, the Facility is a "major source" as that term is defined in Section 39.5(2)(c) of the Act, 415 ILCS 5/39.5(2)(c) (2010).
- 37. As a major source since at least April 16, 2002, or a date better known to Nacme, Nacme was required to apply for and submit an application to the Illinois EPA for a CAAPP or, alternatively, a FESOP, at least 180 days before commencing operation

in accordance with the change in operation at the Facility. By operating a major source without timely submitting an application within at least 180 days before commencing operation as a major source, Nacme violated Section 39.5(5)(x) of the Act, 415 ILCS 5/39.5(5)(x) (2010), and, thereby, violated Sections 39.5(6)(b) and 9(b) of the Act, 415 ILCS5/39.5(6)(b) and 9(b) (2010).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against the Respondent, NACME STEEL PROCESSING, LLC:

- 1. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;
- 2. Finding that Respondent violated Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010);
- 3. Ordering the Respondent to cease and desist from any further violations of Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010);
- 4. Ordering Nacme to immediately undertake the necessary corrective action that will result in a final and permanent abatement of violations of Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010), including but not limited to securing a CAAPP or FESOP permit from the Illinois EPA that appropriately reflects the operations and emissions at the Facility;

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- 5. Assessing against Nacme a civil penalty, pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2010), of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act, with an additional penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;
- 6. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees, against Respondent; and
 - 7. Granting such other relief as the Board deems appropriate and just.

PEOPLE OF THE STATE OF ILLINOIS, LISA MADIGAN, Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief Environmental Enforcement/ Asbestos Litigation Division

By:

ELIZABETH WALLACE, Chief

Environmental Bureau Assistant Attorney General

Of Counsel:

Nancy J. Tikalsky Assistant Attorney General Environmental Bureau 69 W. Washington St., Suite 1800 Chicago, Illinois 60602 (312) 814-8567

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
Complainant,)	
v.	,	PCB No. 13 - 12 (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,))	(Enforcement 7 m)
Respondent.)	

EXHIBIT B

ANSWER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
Complainant,)	
v.	PCB No. 12 (Enforcement -	Air)
NACME STEEL PROCESSING, LLC,) (Emolection	- 1111)
a Delaware limited liability corporation,)	
Respondent.)	

NOTICE OF ELECTRONIC FILING

To: Nancy J. Tikalsky
Assistant Attorney General
Environmental Bureau
69 W. Washington St., Suite 1800
Chicago, Illinois 814-8567

John T. Therriault, Assistant Clerk Illinois Pollution Control Board 100 West Randolph Street, Suite 11-500 Chicago, Illinois 60601

Bradley P. Halloran, Hearing Officer Illinois Control Board 100 West Randolph Street, Suite 11-500 Chicago, Illinois 60601

PLEASE TAKE NOTICE that today, November 1, 2012, I have filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following Answer and Affirmative Defense of NACME Steel Processing, LLC, to the Complaint of the People of the State of Illinois, a true and correct copy of which is attached and hereby served upon you.

Dated: November 1, 2012

Respectfully submitted,

NACME STEEL PROCESSING, L.L.C.,

Respondent

Bv:

One of Its Attorneys

Edward V. Walsh, III ReedSmith, LLP 10 South Wacker Drive Suite 4000 Chicago, Illinois 60606 (312) 207-1000

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,	}
v. NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,) PCB No. 12) (Enforcement – Air)
Respondent.	}

ANSWER AND AFFIRMATIVE DEFENSE OF NACME STEEL PROCESSING, LLC, TO THE COMPLAINT OF THE PEOPLE OF THE STATE OF ILLINOIS

NACME STEEL PROCESSING, LLC, ("NACME") for and as its answer to the Complaint of the PEOPLE OF THE STATE OF ILLINOIS states as follows:

COUNTI

OPERATING A MAJOR STATIONARY SOURCE WITHOUT A CAAPP PERMIT

1. This count is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, on her own motion and at the request of the Illinois EPA, pursuant to Section 31 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(2010).

ANSWER: NACME admits the State has brought a complaint on behalf of the People of the State of Illinois at the request of the Illinois Environmental Protection Agency ("IEPA").

NACME is without knowledge of the truth of the remaining allegations contained in paragraph 1 and on that basis denies such allegations. NACME further denies that the State is entitled to its requested relief.

2. The Illinois EPA is an agency of the State of Illinois created by the Illinois General Assembly in Section 4 of the Act, 415 ILCS 5/4 (2010), and charged, *inter alia*, with the duty of enforcing the Act.

ANSWER: NACME admits that the IEPA is an administrative agency of the State of Illinois.

NACME denies that the State is entitled to its requested relief and is without knowledge of the truth of the remaining allegations contained in paragraph 2, and on that basis denies such allegations.

3. At all times relevant to this complaint, Respondent has been and is a Delaware limited liability corporation in good standing and duly authorized to do business in the State of Illinois. Nacme owns and operates a steel processing facility located at 429 West 127th Street, Chicago, Cook County, Illinois ("Facility").

ANSWER: Admitted.

4. At the Facility, Nacme operates a ninety (90) ton per hour continuous coil pickling line, comprised of four (4) pickling tanks enclosed in a turbo tunnel enclosure, and a four (4) stage washer. Emissions from the tanks and washers are vented to a Pro-Eco four tray scrubber ("scrubber").

ANSWER: NACME admits that a continuous coil pickling line at its Facility has the capacity to operate at 90 tons per hour. NAMCE admits the remaining allegations of paragraph 4.

5. The pickling tanks, which are heated to approximately 190 degrees Fahrenheit, utilize hydrochloric acid ("HCL") at various concentrations in a dissolution process to remove impurities from hot rolled steel .("pickling"). After pickling, the steel goes through an aqueous based four stage washer ("washing").

ANSWER: NACME admits that the pickling tanks are at times heated to approximately 190 degrees Fahrenheit. NACME admits the remaining allegations contained in paragraph 5.

6. During the pickling and washing, air emissions are captured in ducts and transported via piping to the scrubber. Additionally, pickling and washing tanks containing the HCL are equipped with covers to minimize exposure of HCL to the atmosphere when not in use.

ANSWER: Admitted.

7. On February 8, 2001, the Illinois EPA issued Nacme State Operating Permit No. 96020074 ("SOP") for control of its air emissions at the Facility. The SOP expired on October 25, 2005.

ANSWER: NACME admits that the IEPA issued to NACME a "State Operating Permit-Revised" number 96020074 with an "issued" date of February 8, 2001. NACME admits that the permit bears an "Expiration Date" of October 25, 2005. NACME denies that the permit expired on October 25, 2005. NACME further answers that the permit, which the State has failed to attach to its Complaint, speaks for itself and denies all allegations inconsistent therewith.

8. On April 12, 2002, the Illinois EPA issued revised construction permit No. 01040081 to Nacme for the installation of an emissions tunnel which required retesting of the modified steel pickling process and allowed Nacme to operate its steel pickling process with a rate greater than that allowed by the SOP for the purposes of stack testing only.

ANSWER: NACME admits that the IEPA issued to NACME a "Construction Permit-Revised", number 01040081 and bearing a "Date Issued" of April 12, 2002. NACME further answers that the referenced permit, which the State has failed to attach to its Complaint, speaks for itself and denies all allegations inconsistent therewith.

9. On April 16, 2002, Nacme conducted a stack test at its Facility ("April 2002 stack test"). The April 2002 stack test was based on a maximum steel process rate lower than the permitted steel process rate of Nacme's SOP and resulted in emissions greater than allowed by its SOP.

ANSWER: NACME admits that it conducted a stack test at its Facility as reported in a written "Gaseous Emissions Test" dated April 16, 2002 provided to IEPA. NACME further answers that the report speaks for itself and NACME denies all allegations inconsistent therewith.

10. On April 4, 2005, Nacme submitted its SOP renewal application to the Illinois EPA ("April 2005 SOP renewal application").

ANSWER: NACME admits that by letter dated March 23, 2005 it submitted to IEPA an APC 205A form for renewal of its state operating permit.

11. On April 13, 2005, the Illinois EPA issued a Notice of Incompleteness to Nacme's April 2005 SOP renewal application for failure to provide a potential to emit ("PTE") calculation for HCL and to demonstrate eligibility for a state operating permit.

ANSWER: NACME is without knowledge of the truth of the allegations contained in paragraph 11, further answering that the document upon which the State bases its allegations is not attached to the State's Complaint. On this basis NACME denies the allegations contained in paragraph 11.

12. On September 12, 2005, Nacme submitted a second application for renewal of its SOP ("September 2005 SOP renewal application").

ANSWER: NACME admits that on or about September 12, 2005, it submitted an application for renewal of its SOP.

13. On September 20, 2005, the Illinois EPA issued a Notice of Incompleteness ("September 2005 Notice") to Nacme's September 2005 SOP renewal application for Nacme's failure to substantiate the requested permit limits with any stack testing results.

ANSWER: IEPA's September 20, 2005 notice, which the State has failed to attach to its Complaint, speaks for itself and NACME denies all allegations inconsistent therewith.

14. Additionally, Nacme was notified in the September 2005 Notice that it required a construction permit because its September 2005 SOP renewal application requested a modification consisting of an increase in the maximum steel process rate allowed by its SOP.

ANSWER: IEPA's September 20, 2005 notice, which the State has failed to attach to its

Complaint, speaks for itself and NACME denies all allegations inconsistent therewith. NACME

further denies that an increase "in the maximum steel process rate allowed by its SOP" constitutes a "modification" that required the submittal of a construction permit.

15. Finally, the Illinois EPA notified Nacme in its September 2005 Notice that Illinois EPA had determined that the estimated PTE for the HCL emissions at the Facility based on information provided in Nacme's September 2005 SOP renewal application was greater than 10 tons per year ("tpy") of HCL from a single source. Accordingly, Illinois EPA informed Nacme in writing that it required a Clean Air Act Permit Program ("CAAPP") permit or, alternatively, a Federally Enforceable State Operating Permit ("FESOP").

ANSWER: IEPA's September 20, 2005 notice, which the State has failed to attach to its Complaint, speaks for itself and NACME denies all allegations inconsistent therewith, further stating that the information submitted to IEPA in the September 2005 SOP renewal application was known to IEPA long before that time.

16. On October 25, 2005, Nacme submitted to the Illinois EPA a CAAPP application with a request for a FESOP ("2005 FESOP application"). In its 2005 FESOP application, Nacme requested a maximum steel process rate greater than the maximum steel process rate allowed by Nacme's SOP.

ANSWER: NACME admits that by letter dated October 18, 2005 NACME submitted a FESOP application. NACME further answers that the application, which the State has failed to attach to its Complaint, speaks for itself and denies all allegations inconsistent therewith.

17. On December 6, 2005, the Illinois EPA issued a notice of completeness determination of Nacme's FESOP application ("December 2005 Notice"). In addition, in the December 2005 Notice, the Illinois EPA informed Nacme that "notwithstanding the completeness determination, the Agency may request additional information necessary to evaluate or take final action on the FESOP application."

ANSWER: NACME admits that IEPA issued a December 6, 2005 notice. The State has failed to attach the notice to its Complaint and the notice in any event speaks for itself and NACME denies all allegations inconsistent therewith.

18. On December 21, 2006, Nacme conducted another stack test ("December 2006 stack test"). The test was conducted with a maximum steel process rate greater than the maximum steel process rate allowed by its SOP. Results of the test were reported to the Illinois EPA on February 2, 2007.

ANSWER: NACME admits that it conducted a stack test on or about December 21, 2006 further answering that the process rate used was known to and approved by IEPA ahead of time. The December 2006 stack test report, which the State has failed to attach to its Complaint, speaks for itself and NACME denies all allegations inconsistent therewith.

19. As of February 1, 2012, or a date better known to Respondents, Nacme has failed to submit a construction permit application for process modifications as an amendment to either its 2005 FESOP application or its 2007 FESOP application.

ANSWER: NACME denies that it undertook "process modifications" and on this basis denies that it was required to apply for a construction permit.

20. Section 9(b) of the Act, 415 ILCS 5/9(b) (2010), provides as follows:

No person shall:

(b) Construct, install, or operate any equipment, facility, vehicle, vessel, or aircraft capable of causing or contributing to air pollution or designed to prevent air pollution, of any type designated by Board regulations, without a permit granted by the Agency, or in violation of any conditions imposed by such permit;

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

21. Section 3.315 of the Act, 415 ILCS 5/3.315 (2010), provides the following definition:

"Person" is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

22. Respondent is a "person" as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2010).

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

23. Section 3.165 of the Act, 415 ILCS 5/3.165 (2010), provides the following definition:

"CONTAMINANT" is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

24. HCL is a "contaminant" as that term is defined in Section 3.165 of the Act, 415 ILCS 5/3.165 (2010).

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

25. Section 3.115 of the Act, 415 ILCS 5/3.115 (2010), provides the following definition:

"AIR POLLUTION" is the presence in the atmosphere of one or more contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life, to health, or to property, or to unreasonably interfere with the enjoyment of life or property.

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

26. Because the Facility emits, or is capable of emitting, HCL, a contaminant, to the atmosphere, it is capable of causing or contributing to "air pollution" as that term is defined in Section 3.115 of the Act, 415 ILCS 5/3.115 (2010).

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

27. Section 39.5(6) (b) of the Act, 415 ILCS 5/39.5(6) (b) (2010), provides as follows:

Prohibition

After the applicable CAAPP permit or renewal application submittal date, as specified in subsection 5 of this Section, no person shall operate a CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such a source has been timely submitted to the Agency.

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

28. Section 39.5(5) of the Act, 415 ILCS 5/39.5 (5) (2010), provides, in pertinent part, as follows:

Applications and Completeness.

x. ... The owner or operator of an existing source that has been excluded from the provisions of this Section under subsection 1.1 or paragraph (c) of subsection 3 of this Section and that becomes subject to the CAAPP solely due to a change in operation at the source shall submit its complete CAAPP application consistent with this subsection at least 180 days before commencing operation in accordance with the change in operation.

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

29. Section 39.5(2) of the Act, 415 ILCS 5/39.5(2) (2010), provides, in pertinent part, as follows:

Applicability

a. Sources subject to this Section shall include:

- i. Any major source as defined in paragraph (c) of this subsection.
- c. For purposes of this Section the term "major source" means any source that is:
 - i. A major source under Section 112 of the Clean Air Act, which is defined as:

A. For pollutants other than radionuclides, any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit, in the aggregate, 10 tons per year (tpy) or more of any hazardous air pollutant which has been listed pursuant to Section 112 (b) of the Clean Air Act, 25 tpy or more of any combination of such hazardous air pollutants, or such lesser quantity as USEPA may establish by rule.

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

30. Section 39.5(3) of the Act, 415 ILCS 5/39.5 (3) (2010), provides, in pertinent part, as follows:

Agency Authority to Issue CAAPP Permits and Federally Enforceable State Operating Permits.

c. The Agency shall have the authority to issue a State operating permit for a source under subsection (a) of Section 39 of this Act, as amended, and regulations promulgated thereunder, which includes federally enforceable conditions limiting the "potential to emit" of the source to a level below the major source threshold for that source as described in paragraph (c) of subsection 2 of this Section, thereby excluding the source from the CAAPP, when requested by the applicant pursuant to paragraph (u) of subsection 5 of this Section.

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

31. Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010), provides, in pertinent part, the following definitions:

"CAAPP" means the Clean Air Act Permit Program developed pursuant to Title V of the Clean Air Act.

"CAAPP PERMIT"... means any permit issued, renewed, amended, modified, or revised pursuant to Title V of the Clean Air Act.

"CAAPP SOURCE" means any source for which the owner or operator is required to obtain a CAAPP permit pursuant to subsection 2 of this Section.

"OWNER OR OPERATOR" means any person who owns, leases, operates, controls, or supervises a stationary source.

"POTENTIAL TO EMIT" means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by USEPA. This definition does not alter or affect the use of this term for any other purposes under the Clean Air Act, or the term "capacity factor" as used in Title IV of the Clean Air Act or the regulations promulgated thereunder.

"SOURCE" means any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and are under common control of the same person or persons under common control) and that belongs to a single major industrial grouping....

"STATIONARY SOURCE" means any building, structure, facility, or installation that emits or may emit any regulated air pollutant.

"REGULATED AIR POLLUTANT" means the following:

(5) Any pollutant subject to a standard promulgated under Section 112 or other requirements established under Section 112 of the Clean Air Act,

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

- 32. Section 112(a) (6) of the Clean Air Act, 42 USC 7412 (a) (6), provides, in pertinent part, the following definition:
 - (6) Hazardous air pollutant

The term "hazardous air pollutant" means any air pollutant listed pursuant to subsection (b) of this section.

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

33. Section 112 (b) (List of Pollutants) of the Clean Air Act, 42 USC 12 (b) (1), provides, in pertinent part, the following:

(1) Initial list

The Congress establishes for purposes of this section a list of hazardous air pollutants as follows:

Hydrochloric acid

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

34. HCL is a "hazardous air pollutant" ("HAP") and a "regulated air pollutant", as those terms are defined by Section 112 (b) (List of Pollutants) of the Clean Air Act, 42 USC 12 (b) (1), and Section 39.5 (1) of the Act, 415 ILCS 5/39.5(1) (2010), respectively.

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

35. The Facility is a "source" and "stationary source," as those terms are defined in Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010).

ANSWER: NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.

36. Beginning on at least April 16, 2002, or on a date best known to Nacme, Nacme had changed its operations resulting in a PTE of a single HAP, HCL, of greater than 10 tpy, the major source threshold. Accordingly, the Facility is a "major source" as that term is defined in Section 39.5(2) (c) of the Act, 415 ILCS 5/39.5(2) (c) (2010).

ANSWER: Denied.

37. As a major source since at least April 16, 2002, or a date better known to Nacme, Nacme was required to apply for and submit an application to the Illinois EPA for a CAAPP or, alternatively, a FESOP, at least 180 days before commencing operation in accordance with the change in operation at the Facility. By operating a major source without timely submitting an application within at least 180 days before commencing operation as a major source, Nacme violated Section 39.5(5) (x) of the Act, 415 ILCS 5/39.5(5) (x) (2010), and, thereby, violated Sections 39.5 (6) (b) and 9(b) of the Act, 415 ILCS 5/39.5 (6) (b) and 9(b) (2010).

ANSWER: NACME denies that it made any change in operation at the Facility as alleged.

NACME denies the balance of paragraph 37 as stating a legal conclusion to which no response is required.

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against the Respondent, NACME STEEL PROCESSING, LLC:

- 1. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;
- 2. Finding that Respondent violated Sections 39.5(5) (x), 39.5(6) (b), and 9(b) of the Act, 415 ILCS 5/39.5(5) (x), 39.5 (6) (b), and 9(b) (2010);
- 3. Ordering the Respondent to cease and desist from any further violations of Sections 39.5(5) (x), 39.5(6) (b), and 9 (b) of the Act, 415 ILCS 5/39.5 (5) (x), 39.5 (6) (b), and 9(b) (2010);
- 4. Ordering Nacme to immediately undertake the necessary corrective action that will result in a final and permanent abatement of violations of Sections 39.5(5) (x), 39.5(6) (b), and 9 (b) of the Act, 415 ILCS 5/39.5 (5) (x), 39.5(6) (b), and 9 (b) (2010), including but not limited to securing a CAAPP or FESOP permit from the Illinois EPA that appropriately reflects the operations and emissions at the Facility;
- 5. Assessing against Nacme a civil penalty, pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2010), of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act, with an additional penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;
- 6. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees, against Respondent; and
 - Granting such other relief as the Board deems appropriate and just.

WHEREFORE:

NACME requests that Complainant's complaint be dismissed with prejudice and that NACME be awarded its costs.

AFFIRMATIVE DEFENSES

Having fully answered the Complaint, NACME offers the following defenses in further response thereto:

First Defense (Valid Permit)

The State's Complaint fails to state a claim upon which relief can be granted because, among other things, at all times NACME held a valid state operating permit limiting its emissions to below major source thresholds and which, under applicable precedent, is federally enforceable.

Second Defense (Lack of Jurisdiction)

The IEPA did not issue and serve a violation notice upon NACME within 180 days after it became aware of the alleged violation as required by Section 31(a)(1) of the Illinois Environmental Protection Act. The State's allegation that the complaint is filed on its own motion is belied by the State's letter dated January 5, 2012 which states in relevant part: "The Illinois Environmental Protection Agency ("Illinois EPA") referred the above-referenced matter to the Office of the Attorney General for the initiation of an enforcement action". (See Exhibit A attached hereto) As a result, the Board lacks jurisdiction to hear the State's complaint.

Third Defense (Laches)

The State's Complaint is barred by the doctrine of laches because the IEPA has known for years, at least since 2000, of the facts underlying its claim, and has been in regular communication with NACME during that time, but failed without cause to act until now.

Fourth Defense (Waiver)

The State's claims have been waived, in whole or in part, because the IEPA knew or should have known of its purported enforcement rights against NACME, but relinquished those rights by failing to take action timely.

Fifth Defense (Estoppel)

The State's claims are barred, in whole or in part, by the doctrine of estoppel because the Agency regularly communicated with NACME, including thru numerous permit applications, stack tests and during inspections, and knew or should have known of the alleged violation, yet did not inform NACME that is was allegedly violating applicable requirements. Consequently, the IEPA impliedly authorized NACME's operations.

Sixth Defense (No Economic Benefit)

The alleged violation provided no economic benefit to NACME which always operated under and within the limitations of a valid state operating permit, thus no penalties as asserted are applicable.

Seventh Defense (No Harm to Environment)

The alleged violation caused no harm or threat of harm to the environment as NACME has always operated under and within the limitations of a valid state operating permit, thus no penalties as asserted are applicable.

Eighth Defense (No Aid to Enforcement of the Act)

The alleged violation did not impair the IEPA's administration of its air permit program because NACME has always held a valid state operating permit, thus no penalties as asserted would aid in enforcement of the Act.

Ninth Affirmative Defense (No Potential to Emit)

NACME's facility has no potential to emit pollutants above the threshold for major source status as alleged by the IEPA because NACME's facility has a scrubber that is integral to the facility process that controls emissions to below major threshold status.

Respectfully submitted

NACME STEEL PROCESSING, LLC,

Defendant

One of Its Attorneys

Edward V. Walsh, III REED SMITH LLP 10 South Wacker Drive Chicago, Illinois 60606-7507 (312) 207-1000 * * * * * PCB 2013-012 * * * *

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached ANSWER AND AFFIRMATIVE

DEFENSE OF NACME STEEL PROCESSING, LLC, TO THE COMPLAINT OF THE

PEOPLE OF THE STATE OF ILLINOIS, by U.S. Regular Mail, upon the following persons:

Nancy J. Tikalsky Assistant Attorney General Office of the Illinois Attorney General Environmental Bureau 69 West Washington Street, Suite 1800 Chicago, Illinois 60602

John T. Therriault, Assistant Clerk Illinois Pollution Control Board 100 West Randolph Street, Suite 11-500 Chicago, Illinois 60601

Bradley P. Halloran, Hearing Officer Illinois Pollution Control Board 100 West Randolph Street, Suite 11-500 Chicago, Illinois 60601

By:

Edward V. Walsh, III

Date: November 1, 2012

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 13 - 12 (Enforcement – Air)
NACME STEEL PROCESSING, LLC,)
a Delaware limited liability corporation,)
Respondent.)

EXHIBIT C

NACME'S ADMISSION OF FACTS



MAR 2 0 2013

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,	ENVIRONMENTAL
Complainant,	
v. NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,	PCB No. 2013 – 12 (Enforcement – Air)
Respondent.	

NACME STEEL PROCESSING, INC'S RESPONSE TO COMPLAINANT'S FIRST REQUEST FOR ADMISSION OF FACTS

Pursuant to applicable Board rules and Illinois Supreme Court Rules, Respondent NACME STEEL PROCESSING, Inc, ("NACME") states its objections and responses to the, PEOPLE OF THE STATE OF ILLINOIS' (the "State"), First Request for Admission of Facts, ("Requests"), as follows:

GENERAL OBJECTIONS

- 1. NACME objects to the Requests insofar as they purport to seek information which is protected from discovery by the attorney-client privilege and other applicable privileges protecting information from discovery.
- 2. NACME does not concede the relevancy of any information sought or disclosed in responding to the Requests.
- 3. NACME objects to the instructions and definitions in the Requests insofar as they require NACME to undertake investigation or produce information beyond what is required under Board rules.
 - No answer by NACME should be construed as a waiver of any objection.

REQUEST FOR ADMISSION OF FACTS

FACT NO. 1 From 2000 through January 31, 2012, NACME operated the Facility that processed steel.

RESPONSE: NACME denies this Request as to the period of on or about September 10, 2001 to on or about April 2, 2002. NACME admits the balance of the Request.

FACT NO. 2 From 2000 through January 31, 2012, operations at the Facility emitted HCL.

RESPONSE: NACME denies this Request as to the period of on or about September 10, 2001 to on or about April 2, 2002. NACME objects to the use of the undefined term "emitted". Subject to, and without waiving this specific and its general objections, NACME admits the balance of the Request.

FACT NO. 3 From 2000 through January 31, 2012, Emission Units at the Facility included a Pro-Eco four tray scrubber.

RESPONSE: NACME objects to the State's characterization of NACME's Pro-Eco four tray scrubber as an "Emission Unit" within the meaning included in the State's "Definitions". Subject to, and without waiving this specific and its general objections, NACME admits the Request.

FACT NO. 4 From 2000 through January 31, 2012, operations at the Facility include a continuous coil pickling line that had the capacity to operate at 90 tons per hour.

RESPONSE: NACME denies this Request as to the period of on or about September 10, 2001 to on or about April 2, 2002. NACME admits that its pickling line was capable of processing 90 tons of steel per hour during the balance of the stated time period.

FACT NO. 5 From 2000 through January 31, 2012, operations at the Facility include pickling tanks that have been heated to a maximum of 190 degrees Fahrenheit.

RESPONSE: NACME denies this Request as to the period of on or about September 10, 2001 to on or about April 2, 2002. NACME objects to the confusing form of the Request and subject to, and without waiving this specific and its general objections, NACME admits that the acid solution contained within the pickling tanks has been heated to 190 degrees Fahrenheit during

the stated time period.

FACT NO. 6 Based on the April 2002 stack test, operations at the Facility had the PTE greater than 10 tons per year of HCL emission.

RESPONSE: Denied.

FACT NO. 7 Respondent received a written correspondence titled 'Notice of Incompleteness' from the Illinois EPA dated April 13, 2005.

RESPONSE: Admitted.

FACT NO. 8 Respondent received a written correspondence titled 'Notice of Incompleteness' from the Illinois EPA dated September 20, 2005.

RESPONSE: Admitted.

<u>FACT NO. 9</u> Respondent's October 2005 FESOP application, requested an increase in the maximum steel process rate greater than was allowed by its SOP.

RESPONSE: Admitted.

FACT NO. 10 Based on the December 2006 stack test, operations at the Facility had the PTE greater than 10 tons per year of HCL emission.

RESPONSE: Denied.

<u>FACT NO. 11</u> Respondent's March 2007 FESOP application, requested an increase in the maximum steel process rate greater than was allowed by its SOP.

RESPONSE: NACME objects to the Request because it is premised on a characterization by the State and on an unproven fact upon which the State bears the burden of proof, that NACME made a "FESOP application" in March 2007. Subject to, and without waiving this specific and its general objections, NACME admits the Request.

FACT NO. 12 From January 2006 through February 1, 2012, NACME had not submitted a construction permit with its FESOP application as requested by the Illinois EPA in communications to NACME.

RESPONSE: Denied.

FACT NO. 13 Based on the April 2011 stack test, operations at the Facility had the potential to emit greater than 10 tons per year of HCL emission.

RESPONSE: D

Denied.

FACT NO. 14 NACME constructed a Turbo Tunnel enclosure for its Emission Unit at the Facility in 2002.

RESPONSE: NACME objects to the confusing form of the question, i.e. that NACME constructed a Turbo Tunnel "for its Emission Unit". Subject to and without waiving this or its general objections, NACME admits that it constructed a Turbo Tunnel enclosure at its Facility in 2002.

Respectfully submitted,

NACME STEEL PROCESSING, L.L.C.,

Respondent

By:

One of Its Attorneys

Edward V. Walsh, III Reed Smith, LLP 10 South Wacker Drive Suite 4000 Chicago, Illinois 60606 (312) 207-1000

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached NACME STEEL

PROCESSING L.L.C.'S RESPONSE TO COMPLAINANT'S FIRST REQUEST FOR

ADMISSION OF FACTS, by Email and U.S. Regular Mail, upon the following person:

Nancy J. Tikalsky Assistant Attorney General Office of the Illinois Attorney General Environmental Bureau 69 West Washington Street, Suite 1800 Chicago, Illinois 60602

Date: March 19, 2013

NACME STEEL PROCESSING, L.L.C.,

Respondent

By:

Edward V. Walsh, III

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,))) PCB No. 2013 – 12
ν.) (Enforcement – Air))
NACME STEEL PROCESSING, LLC,)
Respondent.)

VERIFICATION

1, JOHN DuBROCK, being duly sworn, state that I am the General Manager of NACME Steel Processing, LLC's ("NACME") facility located at 429 West 127th Street, Chicago, Illinois. I have reviewed NACME's Response to Complainant's First Request for Admission of Facts and state that the responses set forth therein are true and accurate to the best of my knowledge and belief.

John DuBrock

Subscribed and sworn to before me, a notary public in and for said County and State, this day of March, 2013.

Motary Public

My Commission Expires: 2.5.14

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
Complainant,)	
v.) PCB No. 13 - 12	٠-٧
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,) (Enforcement – Ai)	IJ
Respondent.)	

EXHIBIT D

WENZEL DEPOSITION

Transcript of the Testimony of **BRITT E. WENZEL**

Date: October 17, 2013

Case: PEOPLE OF THE STATE OF ILLINOIS VS. NACME PROCESSING, LLC

TOOMEY REPORTING

Phone: 312-853-0648

Fax: 312-853-9705

Email: toomeyrep@sbcglobal.net

Internet: http://www.toomeyreporting.com/

BRITT E. WENZEL October 17, 2013

Page 1

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
PEOPLE OF THE STATE) OF ILLINOIS,) Complainant,)
-vs-) PCB No. 2013-12
) (Enforcement - Air
NACME STEEL PROCESSING,)
LLC, A DELAWARE LIMITED)
LIABILITY CORPORATION,) Respondent.)
Respondent.
Discovery deposition of BRITT E.
WENZEL, taken before NANCY K. SPEARE, C.S.R. and
Notary Public, pursuant to the Illinois Pollution
Control Board rules and all other applicable
rules pertaining to the taking of depositions fo
the purpose of discovery, at 69 West Washington

There were present at the taking of this deposition the following counsel:

1:30 p.m. on the 17th day of October, A.D. 2013.

Street, Chicago, Illinois, commencing at

BRITT E. WENZEL October 17, 2013

2 (Pages 2 to 5)

		Page 2		Page 4
1	OFFICE OF THE ATTORNEY G	ENERAL	1	BRITT E. WENZEL,
	ENVIRONMENTAL BUREAU by		2	called as a witness herein, having been first
2	MS. NANCY J. TIKALSKY and MR. CHRISTOPHER J. GRANT		3	duly sworn, was examined upon oral
3	69 West Washington Street		4	interrogatories and testified as follows:
4	Suite 1800 Chicago, Illinois 60602		5	EXAMINATION
5	(312) 814-8567,		6	by Ms. Tikalsky:
5	on behalf of the Complainant;		7	Q This is the discovery deposition of Britt
6	REED SMITH, LLP by		8	Wenzel in the matter of People versus NACME Stee
7	MR. EDWARD V. WALSH, III		9	Processing, LLC, being taken pursuant to due
8	10 South Wacker Drive 40th floor		10	notice given, the Illinois Pollution Control
	Chicago, Illinois 60606-7507		11	Board rules, the Illinois Supreme Court rules,
9	(312) 207-1000, on behalf of the Respondent;		12	and the Illinois rules of Civil Procedure.
11	MR. DAVID G. SUSLÉR 1965 Pratt Boulevard		13	Exhibit 1 is the notice of deposition,
12	Elk Grove Village, IL 60007		14	and that's all that happens with that one.
13	(847) 806-7273,		15	I'm going to ask you some questions to
13	on behalf of National Material,		16	find out what you know about the facts
14	L.P.; MS. MAUREEN WOZNIAK (via	phone)	17	A Okay.
	1021 North Grand Avenue East	To-to-	18	Q that gives rise to this lawsuit, okay.
16	P.O. Box 19276 Springfield, Illinois 62794-9276		19	If you would state your name and spell
17	(217) 782-5544,		20	it for the record.
18	on behalf of Illinois EPA.		21	A Sure, my name is Britt Ervine Wenzel,
20			22	B-R-I-T-T, E-R-V-I-N-E, W-E-N-Z-E-L.
21			23	Q Just to go through some basics here: You
23			24	need to speak your answers because the court
		Page 3		Page 9
1	DEPOSITION	OF	1	reporter can't interpret sign language and nods
1	BRITT E. WEI		2	and things like that. One person needs to speak
2	Taken: October 1		3	at a time because she can't document both of us
4	raken. October r	7, 2013	4	if we talk at the same time, and I'll remain
5	EXAMINATION BY	PAGE	1150	cognizant of that too. Sometimes you get in
6	Ms. Tikalsky	4	6	conversation and try to understand how things
	IVIS. I IKAISKY	7	7	work you can get carried away. So she'll remind
1			100	그 보고 가는 생활을 다 통증 없는 그 사람이 모두에 있어요. 이번 가게 되는 것 같은 사람들이 되어 그는 그리지 않는 것 같다.
7			8	us Right?
8			8	us Right? THE COURT REPORTER: Um-hum.
8	FYHIRITS		9	THE COURT REPORTER: Um-hum.
8 9 10	EXHIBITS	PAGE	9	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a
8 9 10 11		PAGE	9 10 11	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you
8 9 10 11	Exhibit No. 1	44	9 10 11 12	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you don't understand a question, let me know; and
8 9 10 11 12	Exhibit No. 1 Exhibit No. 2	44 43	9 10 11 12 13	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you don't understand a question, let me know; and I'll rephrase it, come at it a different way.
8 9 10 11 12 13	Exhibit No. 1 Exhibit No. 2 Exhibit No. 3	44 43 49	9 10 11 12 13 14	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you don't understand a question, let me know; and I'll rephrase it, come at it a different way. And if you in an earlier answer you realize later
8 9 10 11 12 13 14 15	Exhibit No. 1 Exhibit No. 2 Exhibit No. 3 Exhibit No. 4	44 43 49 50	9 10 11 12 13 14 15	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you don't understand a question, let me know; and I'll rephrase it, come at it a different way. And if you in an earlier answer you realize later on was not as accurate as it should have been you
8 9 10 11 12 13 14 15	Exhibit No. 1 Exhibit No. 2 Exhibit No. 3 Exhibit No. 4 Exhibit No. 5	44 43 49 50 53	9 10 11 12 13 14 15 16	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you don't understand a question, let me know; and I'll rephrase it, come at it a different way. And if you in an earlier answer you realize later on was not as accurate as it should have been you are free to change your answer. Just let me know
8 9 10 11 12 13 14 15 16	Exhibit No. 1 Exhibit No. 2 Exhibit No. 3 Exhibit No. 4 Exhibit No. 5 Exhibit No. 6	44 43 49 50 53 59	9 10 11 12 13 14 15 16 17	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you don't understand a question, let me know; and I'll rephrase it, come at it a different way. And if you in an earlier answer you realize later on was not as accurate as it should have been you are free to change your answer. Just let me know and I'll let you change it because sometimes as
8 9 10 11 12 13 14 15 16 17	Exhibit No. 1 Exhibit No. 2 Exhibit No. 3 Exhibit No. 4 Exhibit No. 5 Exhibit No. 6 Exhibit No. 7	44 43 49 50 53 59 60	9 10 11 12 13 14 15 16 17 18	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you don't understand a question, let me know; and I'll rephrase it, come at it a different way. And if you in an earlier answer you realize later on was not as accurate as it should have been yo are free to change your answer. Just let me know and I'll let you change it because sometimes as we your recall comes into play as we have a
8 9 10 11 12 13 14 15 16 17 18	Exhibit No. 1 Exhibit No. 2 Exhibit No. 3 Exhibit No. 4 Exhibit No. 5 Exhibit No. 6 Exhibit No. 7 Exhibit No. 8	44 43 49 50 53 59 60 65	9 10 11 12 13 14 15 16 17 18 19	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you don't understand a question, let me know; and I'll rephrase it, come at it a different way. And if you in an earlier answer you realize later on was not as accurate as it should have been yo are free to change your answer. Just let me know and I'll let you change it because sometimes as we your recall comes into play as we have a conversation and looking at documents and thing
8 9 10 11 12 13 14 15 16 17 18 19 20	Exhibit No. 1 Exhibit No. 2 Exhibit No. 3 Exhibit No. 4 Exhibit No. 5 Exhibit No. 6 Exhibit No. 7 Exhibit No. 8 Exhibit No. 9	44 43 49 50 53 59 60 65 67	9 10 11 12 13 14 15 16 17 18 19 20	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you don't understand a question, let me know; and I'll rephrase it, come at it a different way. And if you in an earlier answer you realize later on was not as accurate as it should have been yo are free to change your answer. Just let me know and I'll let you change it because sometimes as we your recall comes into play as we have a conversation and looking at documents and thing like that, okay. So if you don't know or don't
8 9 10 11 12 13 14 15 16 17 18 19 20 21	Exhibit No. 1 Exhibit No. 2 Exhibit No. 3 Exhibit No. 4 Exhibit No. 5 Exhibit No. 6 Exhibit No. 7 Exhibit No. 8 Exhibit No. 9 Exhibit No. 10	44 43 49 50 53 59 60 65 67 71	9 10 11 12 13 14 15 16 17 18 19 20 21	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you don't understand a question, let me know; and I'll rephrase it, come at it a different way. And if you in an earlier answer you realize later on was not as accurate as it should have been yo are free to change your answer. Just let me know and I'll let you change it because sometimes as we — your recall comes into play as we have a conversation and looking at documents and thing like that, okay. So if you don't know or don't remember information to answer just say so. If
8 9 10 11 12 13 14 15 16 17 18 19 20	Exhibit No. 1 Exhibit No. 2 Exhibit No. 3 Exhibit No. 4 Exhibit No. 5 Exhibit No. 6 Exhibit No. 7 Exhibit No. 8 Exhibit No. 9	44 43 49 50 53 59 60 65 67	9 10 11 12 13 14 15 16 17 18 19 20	THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you don't understand a question, let me know; and I'll rephrase it, come at it a different way. And if you in an earlier answer you realize later on was not as accurate as it should have been yo are free to change your answer. Just let me know and I'll let you change it because sometimes as we your recall comes into play as we have a conversation and looking at documents and thing like that, okay. So if you don't know or don't

3 (Pages 6 to 9)

		Page 6		Page 8
1	vour a	bility that you have, okay.	1	response and some of the documents that we had
2		A deposition is the equivalent of	2	submitted to the agency, air permits, some of the
3		ony in court, so you understand that that's	3	past air permits, also some of the exhibits.
4	import	그런 그리고 가는 아이들이 아이들에서 가는 사람들이 살아 하셨다면 하는데 하는데 하는데 하는데 하는데 하는데 되었다.	4	Q Which exhibits?
5		Are there any physical issues that	5	A The air permits, stuff like that where it
6		prevent you from remembering things or	6	was part of the exhibits.
7		the truth?	7	Q Exhibits of today's deposition or earlier
8	A	Total Control of the	8	depositions that Mr. Walsh took?
9		You haven't had there's no medication,	9	A Today's.
10		ohol, or drugs	10	Q I want to start out going through a
11	A	N. N. J.	11	little bit of your background, education. Where
12		- that would inhibit those issues?	12	did you go to school post high school?
13	Okay.		13	A Northern Illinois University.
14		At the end the court reporter types	14	Q Okay, and did you get a degree?
15		she's recording everything and your	15	A Yes, in biological sciences.
16		el will likely reserve the right to review	16	Q And what type of degree, bachelor of
17		you can make changes. The changes are	17	science?
18		ng errors, things like that. You can't	18	A Biological.
		ly change an answer when you review it	19	Q Biological
19			20	A Science.
20		on, the transcript. So you, if you need to	21	O science?
21		e an answer you need to do it during the	22	A Yes.
22		ition, okay.	23	Q So that doesn't relate to a B.S. or a
23		Have you ever been deposed before?	24	B.A.?
24	A	Once.	24	
		Page 7		Page
1		And how long ago?	1	A A B.S.
2	A	Over a decade ago.	2	Q Any post college?
2 3 4	Q	Okay, and was it in your capacity of	3	A Yes, University of Wisconsin, I took
4	work	?	4	courses for environmental auditing. So I became
5		Yes.	5	a certified environmental auditor and registered
6	Q	And what type of deposition was it?	6	environmental manager. And that would have been
7	A	It was more related to a property	7	in the mid-nineties.
8	tran	saction.	8	I also had training through the U.S.
9	Q	Okay, so it wasn't related to air	9	Fish and Wildlife Service with regards to
10	A	No, it was not.	10	wildlife habitat management and wetland
11	Q	pollution or an issuance of a permit	11	delineations and the U.S. Department of
12	or ar	ything like that? Okay.	12	Agriculture in soil sciences.
13		Did anyone help you prepare for your	13	Q The courses as the environmental auditor
14	depo	sition today?	14	and registered environmental manager, what types
15		Yes.	15	of coursework, what kinds of information
16	Q	And who was that?	16	A Sure. Well, basically, went over federal
17	A	Mr. Walsh.	17	regulations, you know, went through everything
18	Q	Anyone else?	18	from waste management to, you know, air
19	A	No.	19	permitting and how to audit plants, facilities
20	Ö	Did you review any documents in	20	for compliance with those types of regulations,
21		aration for your deposition today?	21	even got into polychlorinated biphenyl
Street Street	A	그녀도 그 아이들이 그리고 빠져면서 다른 아이들이 되었다면 이 이렇게 되었다면 하다.	22	regulations and TSCA, Toxic Substance Control
	-			
22 23	Q	And what documents?	23	Act, import and export of chemicals.

4 (Pages 10 to 13)

	Page 10		Page 12
1	And was there any other like training	1	they just changed the position title.
	in relation to NESHAPS, toxic air?	2	Q And how long were you manager?
3	A I am an ERMS account officer, Emission	3	A Approximately, six years.
	Reduction Market System, E-R-M-S. Basically, I	4	Q And did you hold any other positions?
	received training through the Illinois EPA on	5	A Senior project manager.
	that.	6	Q And how long did you do that?
7	Q And when was that?	7	A Approximately, two, three years. Project
8	A Mid-nineties. I apologize, I don't know	8	manager before that, and I don't recall how long
9	the exact date.	9	I was a project manager for that. And then I
10	Q When did you graduate from Northern	10	believe I started out as a staff technician.
11	Illinois University?	11	Q When did you begin working with at
12	A 1988.	12	Mostardi Platt?
13	Q Professional certifications, licenses	13	A 1993.
14	the registered environmental manager is that a	14	Q So with NACME how long have you been
15	national or	15	contracted with NACME to provide the
16	A Yes, it's a national license. I'm no	16	environmental
17	longer up to date on that.	17	A Since, approximately, mid-2000.
18	Q Okay, and environmental auditor was that	18	Q And is that just you, not Mostardi Platt,
19	a certificated license?	19	that you've been involved
20	A It's a license, and I still haven't kept	20	A No, it would have been other individuals
21	that up to date either.	21	that would have performed work per NACME.
22	Q Any other current licenses?	22	Q Okay, but you would not necessarily have
23	A No.	23	been aware of that work or you've reviewed the
24	Q Certifications?	24	files prior to
	Page 11		Page 13
1	A No.	1	MR. WALSH: I'd object to form.
2	Q Do you belong to any professional	2	MS. TIKALSKY: Q You can go ahead and
	organizations?	3	answer. Do you understand it?
4	A No.	4	THE WITNESS: A Can you rephrase it?
5	Q Then moving onto your current occupation,	5	Q Sure. Did you review the file, the NACME
	what is it that you currently do, your title?	6	file, prior to the participating in work for
7	A I'm director of the Environmental Health	7	them?
8	and Safety for Mostardi Platt. I manage the	8	MR. WALSH: Same objection.
9	Environmental Health and Safety Compliance Group	9	THE WITNESS: A I'm not sure I understand
10	of 12 professionals.	10	what you mean.
11	Q And how long have you had that position?	11	MS. TIKALSKY: Q How long has Mostardi
12	A Approximately, two years.	12	Platt provided services for NACME?
13	Q And what did you do before that?	13	A As far as I'm aware that is about the
14	A I was a manager of the Environmental	14	same time, mid-2000.
15	Health and Safety Group. It is, essentially, the	15	Q And what position did you hold when you
16	same position, just with a different title.	16	were providing services to NACME, which one
17	Q Reorganization?	17	the positions did you start with?
18	A Pardon me?	18	A Project manager, possibly senior project
19	Q Reorganization it's the same; just new	19	manager, possibly senior project
20	title?	20	Q And at Mostardi Platt what do you do for
21	A Yeah, we just started — we consolidate,	21	그는 그렇게 하다면 그 이미를 하는데
22	you know, different groups a little bit; and so	22	them as the project senior project manager.
23	more people would have came underneath me that	23	A I would, basically, oversee some
24	would report to me or I'd be their supervisor, so	24	projects, be the act as a project manager for
2.4	would report to me of 1 a be their supervisor, so	24	some of the projects, and that is pretty much

BRITT E. WENZEL October 17, 2013

5 (Pages 14 to 17)

	Page 14		Page 16
1	what I did.	1	Q Do you have does Mostardi Platt have
2	Q What types of projects?	2	like a contract that they execute with NACME or
3	A It can be anything from waste management	3	National Material?
	consulting, performing compliance audits, doing	4	A We, typically, operate on a time and
	air permitting projects, spill planning, could	5	materials basis. I don't believe we've entered
	have been waste water permitting, about the full	6	into a formal liaison going consultations
7	gambit of the environmental stuff.	7	contract.
8	I also get involved in health and	8	Q Would it be fair to say that it's as
9	safety, so it might have been indoor air quality	9	needed?
10	type of monitoring or safety reviews and audits;	10	A Correct.
11	and I participated in the violation negotiations	11	Q So if NACME or a company or NACME
12	for my clients, response activities, agency	12	would receive something from the Illinois EPA and
13	liaison.	13	just send it to you, anticipating that you would
14	Q Anything else?	14	just
15	A I think that sums it up.	15	A Well, in some instances
16	Q So you have experience working with the	16	Q Um-hum.
17	Illinois EPA?	17	A you know, I don't know if they send me
18	A Yes.	18	everything.
19	Q What positions did you hold before you	19	Q Um-hum.
20	started at Mostardi Platt?	20	A You know, I just get involved when
21	A I was a staff technician for Rust	21	they've indicated that they need assistance.
22	Environment and Infrastructure.	22	Q Okay, so if there was just some kind of
23	O What did that involve?	23	letter from the Illinois EPA out of the blue they
24	A I performed compliance audits and	24	would not necessarily just send it right to you?
1	developed environmental management systems for	1	MR. WALSH: Object for lack of foundation.
2	waste disposal facilities.	2	MS. TIKALSKY: Q You can answer.
3	I also did wetland delineation.	3	THE WITNESS: A I don't know the answer to
4	Q Anything related to air?	4	that question.
5	A Some, minor. I got involved in more of	5	Q If you know, if when you do work for
6	the air quality on the exposure side.	6	Mostardi for NACME whether it's NACME that hir
7	Q Can you give me examples?	7	you or National Material?
8	A For a hazardous waste landfill, you know,	8	A Well, I have contact with the NACME
9	I would have been involved in projects that were	9	personnel. That's about all I can answer that.
10	determining whether there was any pollutants in	10	Q Have you published any articles,
11	the ambient air that could impact the local	11	professional articles or
12	population or people.	12	A Yes, I've published proactively managing
13	Q So with Mostardi Platt, just to return to	13	environmental compliance; and I gave a
14	that, in the air work that you've done what types	14	presentation at the Air and Waste Management
15	of air permits facilities I guess I better say	15	Association a number of years ago. I don't
16	what type of facilities have you worked with?	16	recall exactly when. That was done in Nashville,
17	A Printing, steel pickling, candy	17	Tennessee.
18	manufacturing, flavor, plating, bakeries,	18	Q Do you recall where your publication was
19	welding, metal fabricating, landfills - I'm sure	19	published and the year?
20	there's more.	20	A I'm not positively sure but I want to -
21	Q Right "Plating" like coating?	21	1998. I'm not positive of that.
22	A Yeah, hard chrome plating or copper	22	Q Do you know what publication?
23	plating, metal coating operations - bag	23	A It was Air and Waste Management
24	manufacturers.	24	Association. So it was their annual conference.

6 (Pages 18 to 21)

	Page 18		Page 20
1	Q All right. I'm going to move on and just	1	admissions will be or how you
2	talk about some of the Illinois the Illinois	2	A Sure
3	air permitting process. Can you just tell me	3	O address that?
4	from your your knowledge explain the general	4	A Sure. I'm sorry, I didn't mean to
5	process that you go through when you apply for a	5	
6	air permit for a company.	6	interrupt you. It can be a mass balance
7	A Are you including just the paperwork	7	equation; it can be through established emission factors; it can be through actual measurement of
8	filing or	8	an emissions from a source.
9	Q From the from the first step that	9	Q You talk about measurement of a source.
10	you're notified that they need, a company is	10	What exactly are you referring to?
11	thinking they need an air permit	11	A Well, stack testing.
12	A Sure	12	Q And then emissions factors?
13	Q and they come to	13	A Yes, there's established AP 42 emission
14	A Well, first I question them on what their	14	
15	proposed activities are to, first of all,	15	factors for various types of operations that's
16	- *** (1) *** (1) ** (16	established by the, you know, the database
17	determine what they're proposing is even subject	17	maintained by the US EPA, AP 42. There's also a fire database that has
18	to permitting requirements, in other words, is it	18	
19	a regulated pollutant; and then after we clear that we discuss, you know, what their anticipated	19	other emission factors that are available.
20	에 있는 사람들은 아니라 나를 가는 아니는 사람들이 되었다. 그 아니라	20	Q And then mass balance, you said formula?
21	realm of current uses are, the process and what the raw materials are and what's in the raw	21	A Yes, you know, what goes in. Typically,
22	그리아 아이들은 아이들은 아이들은 아니는 아이들은 아이들이 아이들은 아이들은 아이들은 아이들은 아이들은 아이들은	22	that is used when you have coatings or inks or
23	materials. We discuss the types of process rates	23	something like that, solvents in them where
24	and the activities they want to perform, you know, with their objective, what are they going	24	you're drying the entire liquid substrate, so you know that everything's being emitted to the
	Page 19		Page 21
1	to produce from that; and then, if they already	1	
2	have a permit, I typically contact the permit	2	atmosphere so you can accurately count the emissions.
3	engineer as listed on the permit to discuss the	3	
4	proposed project with them and, you know, and	4	Q Do you get involved with any
5	kind of gain a little bit of understanding of how	5	recommendations of emissions equipment or a unit?
6	they want the application process, you know, will	6	A Somewhat. But what I typically do is
7	work for them, with regards to applying for a	7	there's companies that are, you know, design an sell those, so I have resources and contacts
8	permit. And I typically request a – complete a	8	
9	그렇게 되어 면접 하다 아이들은 얼룩하다면서 얼룩하다면 하나지만 하는 얼마를 하게 하지만 나는	9	where I would point my client into the direction
10	construction permit application based upon my conversations with how the permit engineer would	10	where they they're the experts of this equipment, contact them to discuss that.
11	suggest that we proceed forward. I like to do	11	(B. 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
12	that because I like to make the Illinois EPA	12	Q With stack tests can you tell me is it
13	aware of what we're doing with regards to that;	13	necessarily required to do a stack test in order
14	and then we would, basically, complete the	14	to determine emissions, actual emissions type -
15	application and submit it to the agency.		A Can you rephrase that a little bit?
16	Q And you talk about a construction permit,	15	MR. WALSH: I'm going to object to form.
17	하다 귀 하는 것은 가능한 급하다 보다는 계획으로 하나 보다면 하나 있다면 한 것 같아.	16 17	MR. GRANT: He beat you to it.
18	submitting a construction permit. Is that the application you're talking about?		MS. TIKALSKY: Q When would you use a stactest for?
19		18	
20	A Yeah. There's also times when you're	19	THE WITNESS: A Well, if I did not it
21	also submitting operating permit applications.	20	depends on the circumstances, of course, and all
	It depends on the specific project that we're	21	the little nuances in a project; but, generally,
22	involved in.	22	if mass balance equations didn't work and
23	Q With the air permit what can you	23	emission factors were not available or if the
24	explain the process of determining what the	24	factors that were available were what I consider

7 (Pages 22 to 25)

	Page 22		Page 24
	conservative or exceedingly high and did not	1	their current operating permit would they need a
2	really match what the actual emissions from a	2	construction permit for that?
	process are.	3	MR. WALSH: Object to form.
4	Q And when you complete an application for	4	THE WITNESS: A I'm not sure I understand
5	a construction permit what would be the purpose	5	the question.
	for applying for a construction permit?	6	MS. TIKALSKY: Q Okay. Well, let's say
7	A Well, if you have a source of regulated	7	there's they have an operating permit, they
8	pollutants you're required to obtain a	8	have a limit of how much material they can
9	construction permit, unless there's a specific	9	throughput. Is that a reasonable assumption
10	exemption for that source. So prior to	10	about an operating permit limit might be this
11	construction of that source you would need to	11	material throughput?
12	apply and obtain a construction permit from the	12	MR. WALSH: Same objection.
13	Illinois EPA.	13	THE WITNESS: A I'm still I
14	Q What other reasons would a construction	14	MS. TIKALSKY: Q Okay
15	permit be necessary?	15	A I still, I still don't
16	A If if you wanted to modify your	16	Q So operating permits
17	existing source.	17	A Okay.
18	Q What are some examples of modification?	18	Q what limitations are set in an
19	A You could add an additional unit to a	19	operating permit?
20	printing press, you could maybe add an emission	20	A Well, it could be a number of different
21	control unit, you could increase or want to	21	things.
22	increase your throughput.	22	Q And what would that be?
23	THE COURT REPORTER: "Your" what, I'm sorry?	23	A It could be material throughput,
24	THE WITNESS: Your throughput, material	24	operating hours, emissions, levels and rates.
	Page 23		Page 25
1	throughput. It would depend on the, you know,	1	Q So it's throughput, they have a limit of
2	situation.	2	how much throughput?
3	MS. TIKALSKY: Q Is there anything else that	3	A Not all permits.
4	you might need a construction permit too?	4	Q Right, but this operating permit does?
5	THE WITNESS: A Not that I can think of	5	A What
6	right now.	6	Q If it does.
7	Q Does a company need a construction permit	7	A operating permit?
В	to do a stack test?	8	MR. WALSH: Object to form.
9	A CONTRACTOR OF THE CONTRACTOR	9	THE WITNESS: Which
17.15	A No.	10	
10	Q Are there situations in which they would	11	MS. TIKALSKY: Q Okay, an operating permi
11	need a construction permit to do a stack test?	12	has a limit on a throughput, material throughput,
12	A No, not that I'm aware of.		they have a limit?
13	Q So if they were going to increase what	13	THE WITNESS: A Some do; some don't.
14	their current permit allows for throughput of	14	Q Right. If they do have a limit and they
15	material	15	want to operate higher than that limit
16	THE COURT REPORTER: I'm sorry, I coughed and	16	A Okay.
17	couldn't hear "to increase what their current	17	Q okay how would they go about
18	permit"	18	getting a permit to allow them to do that?
19	MS. TIKALSKY: Material throughput they	19	A If they wanted to increase? I apologize,
20	and if that part's the stack test.	20	still I'm not sure I quite understand your
21	THE WITNESS: A Can you rephrase that? I'm	21	question.
22	a little mixed up.	22	Q Okay. If their operating permit has a
23	Q So they want to do a stack test to show	23	throughput limit and they want to increase that
24	emissions based on an increased throughput of	24	throughput limit, what do they need to do?

8 (Pages 26 to 29)

	Page 26		Page 28
1	A They would typically need to, if they	1	A I said it's one of the options.
2	want to increase it, apply to obtain an increase	2	Q Okay, thank you.
3	if the permit has a limitation in it.	3	When when a construction permit is
4	Q Okay, so they just what would they do,	4	submitted do you have any involvement
5	do an application for an operating permit,	5	implementing that permit? Would you have
6	application for a construction permit, what would	6	involvement?
7	they need to do?	7	MR. WALSH: Object to form.
8	A Well, you do a construction permit	8	THE WITNESS: A What do you mean by
9	application or a permit modification request.	9	"implementing"?
10	Q Okay.	10	MS. TIKALSKY: Q Well, when a company gets
11	A I've seen the agency approach it two	11	a construction permit what do they do?
12	different ways.	12	MR. WALSH: Same objection.
13	Q All right. And what would the	13	THE WITNESS: A Well, they would start
14	construction permit, what would be the purpose of	14	constructing their source
15	that?	15	MS. TIKALSKY: Q And would you have any
16	A What would be purpose of a construction	16	involvement
17	permit application?	17	A under normal circumstances.
18	Q Right.	18	No, I typically do not get involved in
19	A I'm not sure - I guess it would be to	19	their construction activities on-site.
20	request an increase in your throughputs.	20	Q When a company has an operating permit
21	Q And what's required in the construction	21	and they want to make some revisions to it what's
22	permit to make that request?	22	the process with the Illinois air permit?
23	A Nothing's required in the construction	23	
24	permit to make the request. It's in the	24	A Well, what's the process that I would I use?
	Page 27		Page 29
1	regulations.	1	Q Yes.
2	Q Okay, so if so how would you determine	2	A The first thing I always do is contact
3	what their emissions would be in a situation like	3	the permit engineer to discuss the process with
4	that?	4	him. Then we typically file for a modification
5	A It all depends on the situation. You	5	request or a construction permit application,
6	could use emission factors. You could use	6	depending on how the permit engineer responds to
7	regulatory limits. You could use mass balance	7	questions about the permit.
8	equation. There's a number of different ways.	8	Q What form does the modification request
9	Q Is it possible you would do a stack test?	9	take?
10	MR. WALSH: Object to the form.	10	A Well, it's - you're filling out the
11	THE WITNESS: A In some instances. It	11	paperwork, the forms.
12	depends on the situation you were in and whether	12	Q It's not just a letter that requests
13	other ways to calculate emissions are available.	13	
	MS. TIKALSKY: Q So stack test isn't an	14	A No, typically, you're filling out forms also with a paperwork exercise.
14	the state of the s		Q For air permits what types of air permits
14 15		1 15	O TOT All DETINIS WHAT TVDES OF AIR DERMITE
15	option?	15	could you tell me eviet with the Till
15 16	option? A Could you please say that again.	16	could you tell me exist with the Illinois
15 16 17	option? A Could you please say that again. Q So, in response, you're stating a stack	16 17	could you tell me exist with the Illinois MR. WALSH: Object to form.
15 16 17 18	option? A Could you please say that again. Q So, in response, you're stating a stack test is not an option	16 17 18	could you tell me exist with the Illinois MR. WALSH: Object to form. THE WITNESS: A What do you mean, exist
15 16 17 18 19	option? A Could you please say that again. Q So, in response, you're stating a stack test is not an option MR. WALSH: Object, mischaracterizes his	16 17 18 19	could you tell me exist with the Illinois MR. WALSH: Object to form. THE WITNESS: A What do you mean, exist with the Illinois EPA
15 16 17 18 19 20	option? A Could you please say that again. Q So, in response, you're stating a stack test is not an option MR. WALSH: Object, mischaracterizes his testimony.	16 17 18 19 20	could you tell me exist with the Illinois MR. WALSH: Object to form. THE WITNESS: A What do you mean, exist with the Illinois EPA MS. TIKALSKY: Q Yeah, the Illinois
15 16 17 18 19 20 21	option? A Could you please say that again. Q So, in response, you're stating a stack test is not an option MR. WALSH: Object, mischaracterizes his testimony. MS. TIKALSKY: Q for the material	16 17 18 19 20 21	could you tell me exist with the Illinois MR. WALSH: Object to form. THE WITNESS: A What do you mean, exist with the Illinois EPA MS. TIKALSKY: Q Yeah, the Illinois Environmental Protection Act, what types of
15	option? A Could you please say that again. Q So, in response, you're stating a stack test is not an option MR. WALSH: Object, mischaracterizes his testimony.	16 17 18 19 20	could you tell me exist with the Illinois MR. WALSH: Object to form. THE WITNESS: A What do you mean, exist with the Illinois EPA MS. TIKALSKY: Q Yeah, the Illinois

9 (Pages 30 to 33)

	Page 30		Page 32
1	there's Federally Enforceable State Operating	1	Q Would you say controlled emissions?
2	Permits, or FESOPs, and there's Title Five	2	A In some instances.
3	permits.	3	Q And uncontrolled emissions?
4	Q And would you Title Five permits also	4	A And others, potentially.
5	referred to cap permits?	5	Q Are you aware of the term potential to
6	A I've seen it used in that sense.	6	emit?
7	Q And is a Federally Enforceable State	7	A Yes.
8	Operating Permit what application do you fill	8	Q Okay, is that a form of emissions?
9	out?	9	A The potential to emit? I'm not sure I
10	A Well, I've seen it done numerous ways.	10	understand the question.
11	There's certain forms that you can use. I've	11	Q Is that a potential to emit, a facility's
12	done it both ways using standard APC forms or the	12	potential to emit what does that mean?
13	cap forms.	13	A It means, basically, the potential of an
14	Q What's a standard APC form?	14	emission source to comit pollutants at its
15	A It's just a form that requests company	15	maximum capacity and design. Limitations on
16	information, process information; it could be	16	operating hours or throughput capacity can be
17	another form that requests process information;	17	incorporated of potential to emit if they're
18	it could be, you know, a form - there's that APC	18	federally enforceable.
19	form that requires you to provide ownership	19	Q What does that mean, "federally
20	information.	20	enforceable"?
21	Q And what's your understanding about the	21	A To my understanding it's having
22	Federally Enforceable State Operating Permit	22	limitations on your operations in a permit.
23	program, is that I guess just to talk about	23	Q And when you say the maximum is that
24	that is that under the Title Five program?	24	seven days a week, 24 hours a day, 52 weeks a
	Page 31		Page 33
1	A Well, I look as at it as under the entire	1	year?
2	permitting program.	2	A Not necessarily.
3	Q Well, I You said there were several	3	Q Can it be?
4	different kinds of permits, the construction	4	A It can be, but in many instances it's
5	permit, the lifetime operating permit, sometimes	5	not.
6	operating permits, then there's the Title Five	6	Q Okay, and what do you have to show do
7	and there's the FESOP. So I would consider that	7	you have to show the Illinois EPA something to
8	the entire I would consider that all the	8	show that it's not?
9	permitting programs; but there are subsets.	9	A For initial permitting I find that they
	MR. WALSH: Okay, I'm going to object to	10	require you to have that; but subsequent
10		11	permitting after the determination has been made
10 11	that. You're testifying. I also object to the	7.4	
11	that. You're testifying. I also object to the extent it calls for a legal conclusion.	12	typically, I've done permit applications that are
	extent it calls for a legal conclusion. THE WITNESS: A I guess I'm not a	1 - CYE 1	typically, I've done permit applications that are not provided potential to emit calculations and
11 12	extent it calls for a legal conclusion.	12	typically, I've done permit applications that are not provided potential to emit calculations and just proposed emissions.
11 12 13	extent it calls for a legal conclusion. THE WITNESS: A I guess I'm not a lawyer I don't get into the legal aspects of	12 13	typically, I've done permit applications that are not provided potential to emit calculations and just proposed emissions. Q When you do lifetime operating permit
11 12 13 14	extent it calls for a legal conclusion. THE WITNESS: A I guess I'm not a lawyer I don't get into the legal aspects of all of that.	12 13 14	typically, I've done permit applications that are not provided potential to emit calculations and just proposed emissions.
11 12 13 14 15	extent it calls for a legal conclusion. THE WITNESS: A I guess I'm not a lawyer I don't get into the legal aspects of all of that. MS. TIKALSKY: Q For a Federally	12 13 14 15	typically, I've done permit applications that are not provided potential to emit calculations and just proposed emissions. Q When you do lifetime operating permit applications do you provide a potential to emit calculation?
11 12 13 14 15	extent it calls for a legal conclusion. THE WITNESS: A I guess I'm not a lawyer I don't get into the legal aspects of all of that. MS. TIKALSKY: Q For a Federally Enforceable State Operating Permit what kind of	12 13 14 15 16	typically, I've done permit applications that are not provided potential to emit calculations and just proposed emissions. Q When you do lifetime operating permit applications do you provide a potential to emit calculation? A For the initial permitting, yes.
11 12 13 14 15 16	extent it calls for a legal conclusion. THE WITNESS: A I guess I'm not a lawyer I don't get into the legal aspects of all of that. MS. TIKALSKY: Q For a Federally Enforceable State Operating Permit what kind of documentation for emissions control is required?	12 13 14 15 16 17	typically, I've done permit applications that are not provided potential to emit calculations and just proposed emissions. Q When you do lifetime operating permit applications do you provide a potential to emit calculation? A For the initial permitting, yes. Q Are there any other well, with the
11 12 13 14 15 16 17 18	extent it calls for a legal conclusion. THE WITNESS: A I guess I'm not a lawyer I don't get into the legal aspects of all of that. MS. TIKALSKY: Q For a Federally Enforceable State Operating Permit what kind of documentation for emissions control is required? A	12 13 14 15 16 17 18	typically, I've done permit applications that are not provided potential to emit calculations and just proposed emissions. Q When you do lifetime operating permit applications do you provide a potential to emit calculation? A For the initial permitting, yes.
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10 (Pages 34 to 37)

	Page 34		Page 3
1	calculation for that revision?	1	the process.
2	A I think a lot of it would depend on	2	A And can you just please rephrase it for
3	well, if it's a new piece of equipment or a new	3	me?
4	emission unit you should would provide that;	4	Q Well, where - a situation where the
5	but if it's just something that's not going to	5	emissions unit is integral to the process.
6	involve, you know, changes in raw materials or	6	A You mean the control device is integral
7	something, you've already permitted that and -	7	to the process?
8	that unit, so I've worked it both ways where the	8	Q Yes, the control device.
9	permit engineers have not requested or required	9	A Yes, it could potential to emit can be
10	me to submit a potential to emit calculations.	10	calculated after control in certain instances
11	Q So, for an example, if the materials	11	where it's integral to the operation of the
12	throughput was, that was something that they	12	equipment.
13	wanted to revise, that was is that an example	13	Q So that could be the actual emissions as
14	of something where you might not have to provide	14	well?
15	the PTE calculations?	15	A Yes,
16	A Well, I guess it, in my understanding, it	16	MR. WALSH: Can we take a short break?
17	depends on the type of what you're doing. If	17	MR. GRANT: Sure.
18	it's not going to result in additional emissions	18	(WHEREUPON, a short break was held)
19	or if you've already established your potential	19	MS. TIKALSKY: Q Just to move directly into
20	to emit in the process in previous permitting you	20	your, some of the work you've done for NACME, yo
21	may not provide that that time. That's why I try	21	stated that about mid-2000 is when you began and
22	to work with the permit engineers pretty closely	22	Mostardi Platt began working with
23	in all my permitting processes to make sure I	23	THE WITNESS: A Yeah, I'm not sure Mostardi
24	provide them exactly what they need to process	24	Platt per se But me.
	Page 35		Page 3
1	the permit.	1	Q Okay, what kinds of services have you
2	Q And when we, just to clarify, when we	2	provided NACME?
3	talk about potential to emit that's uncontrolled	3	A Sure, spill planning, air permitting,
4	emissions?	4	hazardous waste management, all of the reporting
5	A Not always.	5	associated reporting activities, determination of
6	Q When is it a situation when it's not	6	whether they're subject to storm water
7	uncontrolled?	7	permitting, and so general environmental
8	A Well, if you have a control device that's	8	compliance. We've also got involved somewhat or
	integral to the enquetion of the process the st.	9	the safety aspect with regards to personal
9	integral to the operation of the process then the	-	the salety depect with regards to personal
9 10	potential to emit can be calculated after	10	protective equipment and those kind of
9 10 11		1 2	
9 10 11 12	potential to emit can be calculated after	10	protective equipment and those kind of
9 10 11 12 13	potential to emit can be calculated after control.	10 11	protective equipment and those kind of activities. Q Anything else?
9 10 11 12 13	potential to emit can be calculated after control. Q What determines if a unit is integral,	10 11 12	protective equipment and those kind of activities. Q Anything else? A I did work with the initial violation,
9 10 11 12 13 14	potential to emit can be calculated after control. Q What determines if a unit is integral, emissions unit is integral to the project?	10 11 12 13	protective equipment and those kind of activities. Q Anything else? A I did work with the initial violation, 2000 violation notice; and that was more in the
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9 10 11 12 13 14 15	potential to emit can be calculated after control. Q What determines if a unit is integral, emissions unit is integral to the project? MR. WALSH: I'm going to object. It calls for a legal conclusion.	10 11 12 13 14 15	protective equipment and those kind of activities. Q Anything else? A I did work with the initial violation, 2000 violation notice; and that was more in the capacity of responding to requests for information.
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9 10 11 12 13 14	potential to emit can be calculated after control. Q What determines if a unit is integral, emissions unit is integral to the project? MR. WALSH: I'm going to object. It calls for a legal conclusion. THE WITNESS: A Yeah, I'm not I think it varies, depending on different circumstances and the use, the type of process, and the type of control device. It's every case is different. MS. TIKALSKY: Q So in a situation like you just described would actual emissions be the same	10 11 12 13 14 15 16 17 18 19 20 21	protective equipment and those kind of activities. Q Anything else? A I did work with the initial violation, 2000 violation notice; and that was more in the capacity of responding to requests for information. Q And that was the Illinois EPA that had requested information? A Correct. Q And what was the initial violation?

11 (Pages 38 to 41)

	Page 38	170	Page 4
1	Q The support facility you're referencing	1	inspections, have you ever been present?
2	that relationship with NACME?	2	A Unfortunately, no.
3	A Yes, I believe that was it.	3	Q And when they Sometimes I know when
4	Q With air do you set up any of the stack	4	they do stack tests you notify Illinois EPA. Is
5	tests?	5	that something you do?
6	A What do you mean "set up"?	6	A It depends, sometimes I do and sometimes
7	Q Do you organize?	7	I don't. It's conducted by the client, and
8	A We have a group within our company that	8	that's really a call of the client.
9	that's what they do, and they pretty much set up	9	Q When they do stack tests are you present
10	the stack testing programs and perform the stack	10	at the facility?
11	testing.	11	A Sometimes I am; sometimes I'm not.
12	Q And have they done that for NACME?	12	In the instance of NACME, no, I have
13	A Yes.	13	not been.
14	Q Do you know what years they've done?	14	Q When you talk about air do you have
15	A I know we've done one in 2002, 2006, 2011	15	you completed applications for NACME, is that
16	for determining emissions rates, how the exhaust	16	what you said?
17	stack. We have done diagnostic-type testing to	17	A I'm not sure what you mean there.
18	just ensure that the scrubber was operating	18	Q For the air applications, for the air
19	properly, the emission control device recently,	19	permit applications have you completed them for
20	relatively recently, I believe it was 2012.	20	NACME?
21	Q So there's different kinds of stack	21	A For construction or operating or
22	tests?	22	Q Any kind.
23	A Yes.	23	A I've done the FESOP renewal I worked on
24	Q And the difference between is the	24	with Mr. Brodsky. I've done construction permi
	Page 39		Page 4
1 .	purpose?	1	requests for them.
2			
	A Correct.	2	
3		2	Q Do you remember which construction perm
3 4	Q Are there different procedures that also go in, fall into place?	2 3 4	Q Do you remember which construction perm request?
	Q Are there different procedures that also	3 4	Q Do you remember which construction permit request? A I know I did an initial one back or I
4	Q Are there different procedures that also go in, fall into place? A Yes, there are.	3 4 5	Q Do you remember which construction permirequest? A I know I did an initial one back or I shouldn't say an initial one in 2000, and I
4 5	Q Are there different procedures that also go in, fall into place? A Yes, there are. Q Were you aware of one in 2013 in April?	3 4 5 6	Q Do you remember which construction perm request? A I know I did an initial one back — or I shouldn't say an initial — one in 2000, and I — for 2005.
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12 (Pages 42 to 45)

	Page 42		Page 44
1	Q In 2000 when you did the construction	1	MR, WALSH: Are we calling this Exhibit 2?
2	permit do you remember doing a PTE calculation?	2	THE WITNESS: Yes.
3	A At that time I do not believe I did.	3	MR. WALSH: Okay, thank you.
4	Q What about the renewal application in	4	MS. TIKALSKY: Q - February 11th, 2012.
5	2005?	5	MR. WALSH: Okay, and I'll just state for the
6	A I believe I did at that time.	6	record that this is not a complete copy of the
7	Q I'm going provide the 2012 construction	7	2012 document.
8	permit application, particular pages on this	8	MS. TIKALSKY: Q Do you recognize this
9	you want to	9	document?
10	THE COURT REPORTER: Do you want me to mark	10	THE WITNESS: A Yes.
11	this?	11	(Mr. Grant handed a document to reporter)
12	MS. TIKALSKY: 2, right?	12	THE COURT REPORTER: I'll mark this one now
13	THE COURT REPORTER: Exhibit 2?	13	1.
14	MS. TIKALSKY: Yeah. Because Exhibit 1 was	14	MS. TIKALSKY: Thank you.
15	the notice of	15	(document marked as requested)
16	THE COURT REPORTER: Okay, because I don't	16	MS. TIKALSKY: Q Turn to page, application
17	have anything marked.	17	page 32. Is there - H-C-L is hydrochloride
18	MR. WALSH: Oh, previously marked exhibit	18	MR. WALSH: I'm sorry, where are you, Nancy?
19	MS. TIKALSKY: Oh, previously marked I	19	MS. TIKALSKY: At Section page 32.
20	think this should be Number 1 for this	20	MR. WALSH: Page 32. Okay, thank you.
21	deposition.	21	MS. TIKALSKY: Okay.
22	MR. GRANT: If you want, I'll go print it	22	Q In the left column near the bottom it
23	out, another copy of the	23	says "other, specify" and it says "HCL"?
24	MS. TIKALSKY: Yeah, would you. Thanks.	24	THE WITNESS: A Yes.
-	Page 43		Page 45
1	MR. WALSH: I'm sorry, I'm confused now.	1	Q What does HCL mean?
2	What are you saying?	2	A Hydrochloric.
3	MR. GRANT: Well, there's two notices, one	3	Q Acid?
4	for his	4	A Yes.
5	MR. WALSH: Yeah.	5	O And there's numbers in the columns.
6	MR. GRANT: and one for John's.	6	Pounds per hour, what does that reflect?
7	MR. WALSH: Yeah.	7	A That reflects the hourly emission rate.
8	MR. GRANT: And so Number 1 in John's dep was	В	Q Is that actual emission rate?
9	that notice for his deposition because the	9	A In this instance?
10	second one for him, that I can just print out, I	10	Q Yes.
11	mean it's	11	A It's yes.
12	MR. WALSH: And make it Exhibit 1 you mean?	12	Q Is that of controlled
13	MR. GRANT: Yeah, right.	13	A After controlled.
14	MR. WALSH: Yeah, that's fine. I don't care	14	Q after it's been through the control?
15	how you do it. I just want the record to be	15	A After control.
16	MS. TIKALSKY: It's right here if you want a	16	Q Okay, and so the number reflected is
17	copy of it.	17	.0004, is that correct?
18	MR. GRANT: Sure.	18	A Yes.
19		19	Q And then in the second column next to it
20	그는 그는 이렇게 하면서 그러워도 가면 없게 한다는 사람들이 가지 않는데 그 나는 사람들이 하다고 있었다. 그리네 구나를 다 보지나 모였다. 기를	20	there's number .44 tons per year?
21		21	A Yes.
22	"	22	Q And that also reflects the actual
23	40 - ^ 12 - 18 19 19 12 - 17 18 18 18 19 19 19 19 19 19 19 19 19 19 19 19 19	23	emission rate after control?
	Construction Permit Application	24	A Not necessarily. That's a de minimis

13 (Pages 46 to 49)

	Page 46		Page 48
1	level, the .44.	1	minus
2	Q Okay, can you explain that?	2	A Yes.
3	A Typically, emissions less than that level	3	Q 0.99?
4	the agency doesn't really get down to those -	4	A Yes.
5	below those levels. So in a lot of the air	5	Q Is that a mathematical
6	permits that I review that have been issued they,	6	A Well, no, it's basically you're just
7	basically, put it at that limit when they're	7	divide - yeah, it's a mathematical equation.
8	listing limitations in permits.	8	You're just, basically - one represents 100%
9	Q So this is limits you anticipate in your	9	control,
10	permit?	10	Q Right.
11	A Yes.	11	A You're subtracting the 99% control; and
12	Q And then I'd like you to turn to page,	12	you're, basically, using that remainder to
13	application page 35. It has very tiny writing.	13	calculate the potential emissions based upon the
	At the top it says "Exhibit 260-1, HCL Pickling	14	emission rate.
	Line Emission Calculations". Do you see that?	15	Q So potential to emit after control?
16	A Yes.	16	A No, that's before control.
17	Q And then there's like an open bar that	17	Q Well, if your control efficiency is 99%,
18	says, "operating conditions, process data"?	18	you go 100% minus 99% point 0
19	A Yes.	19	A No, you're dividing by 0.1. You're not
20	Q Do you see that? And then below that	20	multiplying it.
21	there's another open bar, it says "potential to	21	Q But isn't 0.1 the controlled emissions
22	emit"?	22	rate?
23	A Yes.	23	A Yes, that's why you're dividing it to
24	Q Okay, what does that mean in particular	24	back-calculate the uncontrolled emissions rate.
	Page 47	-	Page 49
1	for this document?	1	
2	A That means potential emissions prior to	2	If I was going to calculate the controlled emissions rate I would multiply it.
3	control.	3	Q Okay, thank you.
4	Q It says Can you explain just below	4	Maybe you can keep them near him in
5	that what the that's the formula or	5	case he needs to use them again.
6	calculations that you're using?	6	This is to be marked Exhibit 3.
7		7	[기계 : 10 M : 10
8	A Yes, it is, basically, taking – using	8	(document marked as requested)
9	the 2006 stack test results of the .0004 pounds	9	MS. TIKALSKY: Q What I've handed you is
10	an hour, that is converted into pounds of HCL	10	dated March 30th, 2005, Application for Renewa
	emissions for ton of steel throughput, and that's		of Federally Enforceable State Operating Permit.
11	divided by the control efficiency or anticipated	11	Do you recognize this document?
12	control efficiency of the oxidite or the	12	THE WITNESS: A Yes.
13	scrubber, and then you multiply that by the	13	MR. WALSH: Again, I'll note for the record
14	maximum number of tons of steel that can be	14	it's not a complete document.
15	through put through the process.	15	MS. TIKALSKY: Q It says "renewal" for the
16	Q And what is your control efficiency?	16	Federally Enforceable State Operating Permit.
17	A I'm sorry?	17	Was your current permit a federal re-enforceable
18	Q What is the control efficiency you	18	state operating permit?
19	said the .99	19	MR. WALSH: Object to form.
20	A It's assumed to be	20	THE WITNESS: A It had limitations,
21	Q one minus	21	restricted emissions from the site.
22	A Yeah assumed to be 99% control. It's	22	Q Do lifetime operating permits have
23	not measured during the stack test.	23	restrictions on emissions?
24	Q Okay, do you see that there's a paren one	24	MR. WALSH: Same objection.

14 (Pages 50 to 53)

	Page 50		Page 52
1	THE WITNESS: A Not all the time.	1	Q Earlier you explained that there are
2	MS. TIKALSKY: Q Can they?	2	different kinds of operating permits, there's
3	A In some instances.	3	lifetime operating permits. Is this a lifetime
4	MS. TIKALSKY: I'd like to mark this Exhibit	4	operating permit?
5	Number 4.	5	A It does not look like one.
6	(document marked as requested)	6	Q And then operating permits, which this
7	MS. TIKALSKY: Q I'm showing you what is	7	one has an expiration date?
8	called Operating Permit - Revised, issued	8	A It's consistent with both different types
9	February 8th, 2001. Do you recognize this	9	of permits I've seen, such as a FESOP or an
10	document?	10	operating permit. I can't really say which one.
11	THE WITNESS: A Yes.	11	It could be either,
12	Q Can you tell me what kind what this	12	Q Did you review this document when you did
13	document is?	13	the renewal for the
14	A It's a permit, an air permit.	14	A I don't recall.
15	Q For who?	15	Q FESOP
16	A NACME Steel Processing it says.	16	And item number two on this document,
17	Q Okay. And do you note the expiration	17	the operation and hydrogen chloride HDL emissions
18	date?	18	from the pickling line shall not exceed the
19	A Yes.	19	following limits, it has steel throughput,
20	Q What does it say?	20	emission factor, and HCL emission. Do you see
21	A October 25th, 2005.	21	that?
22	Q Okay. And does this document have	22	A Yes.
23	emission limitations?	23	Q Could you state what the HCL emissions
24	A Yes.	24	factor is?
	Page 51		Page 53
1	Q Is this the Title Five document?	1	MR. WALSH: Object to form.
2	MR. WALSH: I'm going to object. The	2	THE WITNESS: A What do you mean state wha
3	document speaks for itself.	3	it is?
4	THE WITNESS: A I don't know.	4	MS. TIKALSKY: Q Could you read it?
5	MS. TIKALSKY: Q When you look at it does	5	A It says the emission factor is 4.8 pounds
6	it appear to be a Title Five document?	6	per thousand tons.
7	MR. WALSH: Object to form.	7	Q And then the HCL emission, the third
8	THE WITNESS: A With limitations on it,	8	column, tons per year?
9	yes, it appears to be a type of permit that would	9	A 1.4.
10	be issued as a FESOP.	10	Q And is that after control?
11	MS. TIKALSKY: Q I'll have you turn to	11	A It would have to be.
12	page - it says way at the lower right corner	12	MS. TIKALSKY: Okay, I'm marking Exhibit 5.
13	"NMLP 1251". At the stop it says "Standard	13	(document marked as requested)
14	Conditions for Operating Permit".	14	MS. TIKALSKY: Q I'm showing you what is
15	A Yes.	15	titled the Air Emissions Source Operating Permit
16	Q Is it possible that this is a state	16	Revision Application dated April 11th, 2002. Do
17	operating permit?	17	you recognize this document?
18	MR. WALSH: Object to form.	18	THE WITNESS: A I'm not finished reviewing
	THE WITNESS: A I'm not sure what I	19	it.
19		20	Yes.
19 20	understand what the question is. Is it an air		
19 20 21	permit, yes. Is it an operating permit, yes.	21	Q We'll make a qualification. I'm not sure
19 20 21 22	permit, yes. Is it an operating permit, yes. MS. TIKALSKY: Q An operating permit for	21 22	if it's the entire document or not. It's a good
19 20 21	permit, yes. Is it an operating permit, yes.	21	

15 (Pages 54 to 57)

	Page 54		Page 56
1	at you see the item numbers are numbered	1	permitted emission factor, no control?
2	number 12?	2	A Are you talking about the February 2001
3	A Um-hum.	3	operating permit; is that what we just looked at
4	Q Would you look at number 12.	4	Q I was just trying to understand these
5	A Yes.	5	numbers
6	Q Is that what's used for this application	6	A Sure -
7	in determining the maximum operating time of	7	Q 4.8 pounds HCL per ton of steel
8	emission source?	8	processed.
9	MR. WALSH: I'm going to object. The	9	A That is the factor on this February 2001
10	document speaks for itself. You're	10	permit you showed me. It does not indicate
11	mischaracterizing the question.	11	whether this factor is before or after control.
12	THE WITNESS: A It appears so, based upon	12	Q Right. And on this calculation sheet
13	the calculation.	13	there is, parenthesis, it says, "(no control)"
14	MS. TIKALSKY: Q Okay. And it's based on	14	and in parenthesis it says "(scrubber control)"?
15	24 hours a day, seven days a week, 52 weeks a	15	A Correct.
16	year, is that correct?	16	Q Could you explain what each of those
17	A Yes.	17	mean?
18	Q On page 11, under the number 11 where it	18	A Sure. The - after - no control, that
19	says "efficiency of scrubber"	19	emission factor, it appears that basically is
20	A Yes.	20	taking that 4.8 pounds again, it looks like a
21	Q - is gaseous what would be the HCL	21	typo to me - a thousand tons of steel processed,
22	factor?	22	okay, and saying that's uncontrolled emission
23	A That would be particulate.	23	rate. You would take a factor of 99% control
24	Q What would the gaseous be for?	24	over that, it's going to reduce emissions to the
	Page 55		Page 57
1	A That could be just you've got moisture	1	.0048.
2	and other types of air flow.	2	Q On that last line it says HCL pounds per
3	Q And it states 99.90%?	3	hour
4	A That's what it states.	4	A Yes.
5	Q And then if you would turn to what is	5	Q 3600 pounds per year. Where does the
6	IEPA FOIA 0385 page at the bottom on the right	6	"3600" come from?
7	side of the page, It says the emission	7	A That comes from multiplying the emission
8	calculation.	8	factor by 750,000 tons of steel.
9	A Yes.	9	Q And the results is .41 pounds of HCL per
	Q It says "4.8 pounds of HCL per ton steel	10	hour?
10	processed". What does that mean?		
	processed. What does that mean?	11	A Yes, based upon 8.760 hours year of
11	A Basically, to me looking at it it looks	11 12	A Yes, based upon 8,760 hours year of operation.
11 12		12	operation.
11 12 13	A Basically, to me looking at it it looks		operation. Q And how does that calculate in tons per
11 12 13 14	A Basically, to me looking at it it looks like a typo. Should be for per thousand tons processed. If you look above, the permit	12 13 14	operation. Q And how does that calculate in tons per year?
11 12 13 14 15	A Basically, to me looking at it it looks like a typo. Should be for per thousand tons processed. If you look above, the permit emission factor, meaning that 4.8 pounds of HCL	12 13 14 15	operation. Q And how does that calculate in tons per year? A Well, basically, you can just turn it
11 12 13 14 15	A Basically, to me looking at it it looks like a typo. Should be for per thousand tons processed. If you look above, the permit	12 13 14 15 16	operation. Q And how does that calculate in tons per year? A Well, basically, you can just turn it around, the 3,600 pounds a year. So if I were to
11 12 13 14 15 16	A Basically, to me looking at it it looks like a typo. Should be for per thousand tons processed. If you look above, the permit emission factor, meaning that 4.8 pounds of HCL are emitted per it should be thousand tons of steel processed.	12 13 14 15 16 17	operation. Q And how does that calculate in tons per year? A Well, basically, you can just turn it around, the 3,600 pounds a year. So if I were to take .41 pounds and multiply it by 8,760 that
11 12 13 14 15 16 17	A Basically, to me looking at it it looks like a typo. Should be for per thousand tons processed. If you look above, the permit emission factor, meaning that 4.8 pounds of HCL are emitted per it should be thousand tons of steel processed. Q Okay. Wait, it also says "current	12 13 14 15 16 17	operation. Q And how does that calculate in tons per year? A Well, basically, you can just turn it around, the 3,600 pounds a year. So if I were to take .41 pounds and multiply it by 8,760 that would equal 3,600 pounds.
11 12 13 14 15 16 17 18	A Basically, to me looking at it it looks like a typo. Should be for per thousand tons processed. If you look above, the permit emission factor, meaning that 4.8 pounds of HCL are emitted per — it should be thousand tons of steel processed. Q Okay. Wait, it also says "current permitting emission factor, scrubber control".	12 13 14 15 16 17 18	operation. Q And how does that calculate in tons per year? A Well, basically, you can just turn it around, the 3,600 pounds a year. So if I were to take .41 pounds and multiply it by 8,760 that would equal 3,600 pounds. Q So how would you figure out the maximum
11 12 13 14 15 16 17 18 19 20	A Basically, to me looking at it it looks like a typo. Should be for per thousand tons processed. If you look above, the permit emission factor, meaning that 4.8 pounds of HCL are emitted per it should be thousand tons of steel processed. Q Okay. Wait, it also says "current permitting emission factor, scrubber control". A Yes. What about it?	12 13 14 15 16 17 18 19 20	operation. Q And how does that calculate in tons per year? A Well, basically, you can just turn it around, the 3,600 pounds a year. So if I were to take .41 pounds and multiply it by 8,760 that would equal 3,600 pounds. Q So how would you figure out the maximum potential to emit?
11 12 13 14 15 16 17 18 19 20 21	A Basically, to me looking at it it looks like a typo. Should be for per thousand tons processed. If you look above, the permit emission factor, meaning that 4.8 pounds of HCL are emitted per — it should be thousand tons of steel processed. Q Okay. Wait, it also says "current permitting emission factor, scrubber control".	12 13 14 15 16 17 18 19 20 21	operation. Q And how does that calculate in tons per year? A Well, basically, you can just turn it around, the 3,600 pounds a year. So if I were to take .41 pounds and multiply it by 8,760 that would equal 3,600 pounds. Q So how would you figure out the maximum potential to emit? MR. WALSH: Object to form.
10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Basically, to me looking at it it looks like a typo. Should be for per thousand tons processed. If you look above, the permit emission factor, meaning that 4.8 pounds of HCL are emitted per it should be thousand tons of steel processed. Q Okay. Wait, it also says "current permitting emission factor, scrubber control". A Yes. What about it? Q It says .0048 pounds HCL per thousand	12 13 14 15 16 17 18 19 20	operation. Q And how does that calculate in tons per year? A Well, basically, you can just turn it around, the 3,600 pounds a year. So if I were to take .41 pounds and multiply it by 8,760 that would equal 3,600 pounds. Q So how would you figure out the maximum potential to emit?

16 (Pages 58 to 61)

			10 (Pages 30 to 61
	Page 58		Page 60
	rovide a conservative value, I'd multiply it by	1	A I'd like to see the rest of the stack
	he 8,760 because, typically, machines can't	2	test report.
	perate 24 hours a day, seven days a week, and it	3	Q Well, in the top at the top of the
	vould provide a conservative estimate.	4	column it says "HCL Scrubber Exhaust Stack".
5	Q And to get the tons per year?	5	Does that help?
6	A I would just divide that number by 2000.	6	A That would be after the exhaust stack, so
7	Q But that .41 pounds of HCL per year, per	7	that would be after control.
	our is controlled, correct?	8	Q Okay.
9	A Is it? Based upon this calculation the	9	A If the scrubber was operating at the
	vay it works out it's based upon the 4.8 pounds	10	time. There are times when you do stack testing
	ICL per ton of steel processed. That's the	11	where the control device may not be in operation
	permitted factor here, and that doesn't say	12	Q Um-hum.
	vhether it's controlled or not. It's just based	13	A Do you have the rest of the report?
	pon the permitted factor.	14	Q I don't think I have that.
15	Q And where does the factor come from?	15	Do you recall with the 2005 application
16	A I'm not sure. That was permitted before	16	if it was based on this stack test?
17 I	believe I got involved in the permitting	17	A No, I don't recall.
18 F	process.	18	MS. TIKALSKY: Exhibit 7.
19	Q Um-hum.	19	(document marked)
20	A So it would have been established by the	20	MS. TIKALSKY: Q I'll have you look at
21 I	llinois EPA in the permit.	21	this is just to say Renewal Application,
22	Q Is it based on an application request?	22	Federally Enforceable State Operating Permit,
23	A I don't know. That was This is the,	23	dated October 18th, 2005; and the third last page
24 3	ou know, this is the permit I think there	24	is numbered "NMLP 0291" on the bottom right.
	Page 59		Page 6
1 1	was I don't know if there was or how that	1	MR. WALSH: I'm sorry, what page did you say!
	process or where that emission factor became	2	MS. TIKALSKY: NMLP 291.
	established. That was before I was involved in	3	MR. WALSH: Okay, I thought you said very
	the project or with NACME.	4	last page.
5	MS. TIKALSKY: I'd like to mark this Exhibit	5	MS. TIKALSKY: Third one.
	5.	6	MR. WALSH: Okay, thanks.
7	(document marked as requested)	7	MS. TIKALSKY: Q In the left column near
8	MS. TIKALSKY: Counsel,	8	the bottom it says, "other, specified HCL"; do
9	Q Do you recognize this document?	9	you see that.
10	THE WITNESS: A Yes.	10	
11	Q How do you recognize this document?	11	THE WITNESS: A Yes, ma'am.
12	그렇게 하는 것이 이번에 가는 그리고 있는 것이 없는데 그들이 가득하다면 하셨다면 되었습니다. 이번에 가나를 하는데 그렇게 되었다.	12	Q And then it says "maximum"?
	A I'm not sure what — How do I recognize it? I've seen it before.		A Yes.
14		13	Q And that's in the pounds per hour column,
	Q Okay. I'll qualify this is the Gaseous	14	it says "4.34"?
	Emissions Test performed for NACME Steel	15	A Yes.
0.074.4	Processing, LLC, dated April 16th, 2002. I'd	16	Q What does that represent?
	like you to turn to what is the bottom right-hand	17	A It appears to be the hourly emission rate
	corner "NMLP 0243". In a little chart under	18	of HCL.
	Summary of Results	19	Q Okay, and at the top of that second
20	A Yes.	20	column it has an uncontrolled emission rate
21	Q the second item, it says "HCL emission	21	box
	rate, pounds per hour, 0.217"?	22	A Yes.
23	A Yes.	23	Q with an X in it? And a super one
24	Q Is that control emissions?	24	there that says, "check uncontrolled emission

17 (Pages 62 to 65)

	Page 62		Page 64
1	rate box if control equipment is used"?	1	A That's what the document says.
2	A Yes, I see it.	2	Q All right.
3	Q Okay, so this is what the emission rate	3	And you were involved in the creation
4	is when the controlled equipment is in place?	4	of this document?
5	A I don't think necessarily, no.	5	A I believe a project engineer at Mostardi
6	Q Why not?	6	Platt was named, like Karyn Andersen.
7	A Because I'm not sure exactly what that	7	Q So what were you involved with with this
8	rate is based on.	8	renewal application?
9	Q So they may have checked the wrong box?	9	A I'm - I was involved with corresponding,
10	A I don't know that.	10	or I should say discussing the process with
11	Q From the document here what would, if you	11	Valeriy Brodsky, the permit engineer, and
12	were reading this document, how would you	12	responding to his requests for information. And
13	understand it?	13	also, discussing the permit, this permitting, the
14	MR. WALSH: Object, calls for speculation.	14	process.
15	THE WITNESS: A Well, I guess there's two	15	Q Um-hum. Are you aware of what the
16	ways I could look at this. I looked at the	16	potential to emit at the time of this application
17	emission factor over on the right at .0065 or the	17	was for the facility?
18	pounds per hour; and there I don't know if	18	A No, not specifically what it was. I
19	whether they've assumed 24-hour operation or they	19	think I would have based it upon what we were
20	put there's limitations on operations. As I	20	permitted for.
21	discussed earlier, you cannot operate a piece of	21	MR. WALSH: Nancy, can we take a short break?
22	equipment 24 hours a day, seven days a week,	22	MS. TIKALSKY: Sure.
23	typically. There's maintenance activities and	23	(WHEREUPON, a break was held)
24	other things or 365 days a year that you have to	24	MS. TIKALSKY: Number 8.
	Page 63		Page 65
1	perform on that.	1	(document marked as requested)
2	Q So at the top you were looking at the	2	MS. TIKALSKY: Q Do you recognize this
3	far right column where it says ".0065" pounds per	3	document at all?
4	HCL per ton of steel?	4	THE WITNESS: A Yes.
5	A Yes.	5	Q This is a document, a fax with pages
6	Q Does that mean that the rate for the	6	attached, faxed cover sheet with pages attached,
7	steel throughput, the amount of steel throughput?	7	to the Illinois EPA, attention: Val Brodsky,
8	A It could be. You know, I don't see any	8	B-R-O-D-S-K-Y, from it's Blythe Cozza. Do you
9	other data.	9	know Blythe Cozza?
10	Q And the next column over it says ".951"	10	A No.
11	tons per year under the permitted emission rate?	11	Q It's NACME Steel Processing, LLC,
12	A Yes, I see it.	12	regarding it says, the Following is from the
13	Q Is that the tons per year emission rate	13	stack test the 5-97, conducted by Macro Beck,
14	of HCL after control?	14	(phonetic).
15	A Well, I see permitted emission rate. It	15	And I'll have you turn to the last
16	doesn't say	16	page, NMLP 0008, in the bottom right corner,
17	Q Okay.	17	"Field Data and Results Page, Scrubber Inlet".
18	A It just says as a "provide the	18	What does that mean?
19	emission rate that will be used as a permit	19	
20	special condition".	20	A Based upon what it says I would guess
21	Q So if the 4.34 were the pounds per	21	that it's the stack going into the scrubber.
22	hour of emissions, if the control equipment was	22	Q Is that uncontrolled emissions?
23	used and next to it it says "19" tons per	23	A I would guess so, if it's before the
24	year?	24	scrubber it would be uncontrolled emissions.
	Jour.	24	Q Okay. And in the, about the middle of

	Page 66		Page 68
1	the page, at Roman numeral number two, Results	1	A Yes.
2	A Um-hum.	2	Q It says .012?
3	Q - you have the HCL pounds per hour	3	A "0.012".
4	line	4	Q Yes. Is that an emissions rate summary
5	A Yes.	5	after control?
6	Q do you see that? And in the far right	6	A Yes, based upon the exhaust stack,
7	column it says "average"?	7	scrubber exhaust that would be after control.
8	A Yes.	8	Q And, again, to calculate the potential to
9	Q It says "21.41"?	9	emit based on the, what, 99.9% control?
10	A Yep.	10	A Well, you don't know that that scrubber's
11	Q So what 21.41 pounds per hour, what	11	operating at that control efficiency. So, again,
12	would the tons per year of the HCL be?	12	to get an accurate PTE you'd have to know the
13	A Well, if you - I don't have a calculator	13	scrubber control efficiency at the time of the
14	to do the math but if you multiply it by the	14	stack test.
15	8760 or the maximum operating hours that source	15	Q Right. And that's not in any of this
16	can operate, you would have to know what the	16	data here, the summary?
17	maximum source operating hours are to calculate	17	A I do not see it.
18	potential to emit for that.	18	Q But the calculation to get the PTE would
19	Q And that would be per hour and then just	19	be times that 8760 maximum?
20	divide it by 2000 to get tons per year	20	A Assuming that that was the maximum
21	A Yes -	21	operating hours of the equipment.
22	Q pounds per year?	22	Q Divided by 2000, you'd get tons per hour?
23	A That's what's also been called is - you	23	A That would be tons per year.
24	don't have a lot of the supporting data to make	24	Q Tons per year.
	Page 67		Page 69
1	sure that the stack testing because this is	1	And then that would be the emission
2	what this stuff is was done according to EPA	2	rate controlled emission rate, right?
3	procedures. There should be a lot of backup data	3	A Annual?
4	that would, calibration records and a lot of that	4	Q Tons per year, yeah.
5	that you'd have to you know, typically you	5	A That sounds right. I'm not doing the
6	would see with this to make sure it was measured	6	math, so I - If you took that and you assumed
7	correctly in accordance with EPA methods.	7	that it could operate, 760, you would multiply
8	MS. TIKALSKY: Okay, mark this as Exhibit 9.	8	that by that rate and divide by 2000 would give
9	(document marked as requested)	9	you tons per year.
10	MS. TIKALSKY: Q I represent that this is	10	Q And if I wanted to then calculate what
11	the partial pages of the Hydrogen Chloride	11	the uncontrolled emissions were I would
12	Emission Compliance Test Report dated April 1,	12	A You'd need to find out what the scrubber
13	2011. Do you recognize the document?	13	control efficiency was at the time of the test.
14	THE WITNESS: A Yes.	14	Q Right. And then I would divide that by
15	Q I'll have you turn to page NMLP 0075. It	15	the control efficiency?
16	states this is the Test Result Summaries, is that	16	A Well, one minus the control efficiency,
17	correct	17	right, like we discussed earlier.
18	A Correct.	18	Q Right.
19	Q at the top?	19	I would like you to turn to page 10 of
20	And the second bar it says, Hydrogen	20	the document at the bottom there. There's some
21	Chloride Emissions, do you see that?	21	notes there in the lower right corner.
22	A Correct.	22	A Yes,
23	Q And the last column, "average under	.23	Q They're calculations?
24	pounds per hour", do you see that?	24	A Could be. It could just be some a lot

19 (Pages 70 to 73)

	Page 70		Page 72
1	of times when you do calculations you're kind of	1	Q And the top page is "NMLP 0233" in the
2	running through different numbers and different	2	bottom right corner, the permit denial, dated May
3	stuff. I would have to Some of it's cut off.	3	16th, 2002, is that correct
4	So it's hard to tell. Those could be notes after	4	A Yes.
5	the fact. You don't know when they were made.	5	Q do you see that? Can you read the
6	Q The It looks like it's an e-mail	6	first paragraph where it says "the Illinois EPA".
7	document from R. Linden. Who's "R. Linden"?	7	A It says "We read your application for
8	A Rosanne Linden. She's a project manager	8	operating permit for the above referenced
9	at Mostardi Platt. She would have been involved	9	project. The permit application is denied
10	in track probably getting the process data to	10	because Sections 9 and 39.5 of the Illinois
11	be recorded during the stack test, see the	11	Environmental Protection Act and 35 Illinois
12	tonnage of throughput, and requesting the	12	Administrative Code, Section 201.160 might be
13	information.	13	violated."
14	Q You don't know whose handwriting this	14	Q And then the next paragraph where it says
15	would be?	15	"the Illinois EPA", if you read the first
16	A This writing on the bottom is mine.	16	sentence.
17	Q It is yours?	17	A "The Illinois EPA will be pleased to
18	A Yes, right here.	18	review a reapplication for this permit that
19	Q And you don't recall what that was about?	19	includes the necessary information and
20	A Like I said, a lot of times what I do is	20	documentation to correct the deficiencies noted
21	I try and do different numbers and come through	21	above."
22	and see what, the calculated hourly emission rate	22	Q And in just summarizing "the condition
23	potentially for purposes of the application, like	23	above", is that emissions test to be performed by
24	we did in the previous one where we came up with	24	an approved testing service?
	Page 71		Page 73
1	the .41 pounds an hour, you know, you've got to	1	MR. WALSH: I'm going to object. The
2	have some information that you would put in some	2	document speaks for itself.
3	of the application forms, so you - it could just	3	MS. TIKALSKY: Q This permit included a
4	be some hand scratch and doing different values	4	condition that the emission test be performed by
5	and numbers.	5	an approved testing service, do you that in
6	Q So the .012 appears to be, 0.012 appears	6	number one, the second sentence?
7	to be pounds per hour of HCL emissions from the	7	A Yes.
8	stack test and then divided by 0.01 equals 1.2,	8	Q And then I'd like you to turn to what is
9	that may be the one minus 99	9	document NMLP 0237 and 0238. In relation to the
10	A Yes, that could be.	10	permit denial, this is dated May 28, 2002 letter
11	Q9?	11	to the Illinois EPA from NACME, Thomas Beach,
10	A Assuming, again, it's an assumption that	12	vice-president, plant manager, do you recognize
12	itta 000/ sontwol	1 3	this letter?
13	it's 99% control.	0 7 7 7	A Vas
13 14	Q Um-hum. Okay.	14	A Yes.
13 14 15	Q Um-hum. Okay. What time is it?	14 15	Q Did you help write it or compose it?
13 14 15 16	Q Um-hum. Okay. What time is it? MR. GRANT: About seven minutes to 4:00.	14 15 16	Q Did you help write it or compose it?A Yes.
13 14 15 16 17	Q Um-hum. Okay. What time is it? MR. GRANT: About seven minutes to 4:00. (Mr. Tikalsky handed reporter a document)	14 15 16 17	Q Did you help write it or compose it?A Yes.Q And what was the purpose of this letter?
13 14 15 16 17 18	Q Um-hum. Okay. What time is it? MR. GRANT: About seven minutes to 4:00. (Mr. Tikalsky handed reporter a document) (document marked)	14 15 16 17 18	 Q Did you help write it or compose it? A Yes. Q And what was the purpose of this letter? A It was to submit the stack test report to
13 14 15 16 17 18 19	Q Um-hum. Okay. What time is it? MR. GRANT: About seven minutes to 4:00. (Mr. Tikalsky handed reporter a document) (document marked) MS. TIKALSKY: Okay?	14 15 16 17 18 19	 Q Did you help write it or compose it? A Yes. Q And what was the purpose of this letter? A It was to submit the stack test report to the Illinois EPA, also request incorporation of
13 14 15 16 17 18 19 20	Q Um-hum. Okay. What time is it? MR. GRANT: About seven minutes to 4:00. (Mr. Tikalsky handed reporter a document) (document marked) MS. TIKALSKY: Okay? THE COURT REPORTER: Um-hum.	14 15 16 17 18 19 20	 Q Did you help write it or compose it? A Yes. Q And what was the purpose of this letter? A It was to submit the stack test report to the Illinois EPA, also request incorporation of the data into an operating permit, and then also
13 14 15 16 17 18 19 20 21	Q Um-hum. Okay. What time is it? MR. GRANT: About seven minutes to 4:00. (Mr. Tikalsky handed reporter a document) (document marked) MS. TIKALSKY: Okay? THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q This is a group of	14 15 16 17 18 19 20 21	Q Did you help write it or compose it? A Yes. Q And what was the purpose of this letter? A It was to submit the stack test report to the Illinois EPA, also request incorporation of the data into an operating permit, and then also it helped to notify them that the pickling baths
13 14 15 16 17 18 19 20	Q Um-hum. Okay. What time is it? MR. GRANT: About seven minutes to 4:00. (Mr. Tikalsky handed reporter a document) (document marked) MS. TIKALSKY: Okay? THE COURT REPORTER: Um-hum. MS. TIKALSKY: Q This is a group of documents from 2002. Do you recognize these	14 15 16 17 18 19 20	 Q Did you help write it or compose it? A Yes. Q And what was the purpose of this letter? A It was to submit the stack test report to the Illinois EPA, also request incorporation of the data into an operating permit, and then also

20 (Pages 74 to 77)

	Page 74		Page 76
1	Q Did an application accompany this with	1	A Yes, I see that.
	compliance	2	Q And what does that mean to you?
3	A The test report, this was a - it's my	3	A Well, if we want to send in another
4	recollection that this covered a previous	4	application they'll review it.
5	application, and it was a submittal of the test	5	Q Right.
6	report for that application.	6	A That's different than a permit being
7	Q Is that for the application that we just	7	dead.
8	read, the permit denial on NMLP 223?	8	Q But they would expect another
9	A I am not sure. I don't recall exactly.	9	application?
10	There's been a couple different construction	10	A I don't know if they would expect one.
11	permits issued at various times.	11	They said they would review one if it's
12	Q Is this a denial of an operating permit	12	submitted.
13	or a construction permit?	13	Q And then looking at the pages 0234, 0235
14	A It says operating permit.	14	and 0236, this is a Construction Permit - Revised
15	Q And this letter is a request	15	on the first page, 0234, issued April 12th, 2002.
16	A To request a submittal of the stack	16	"Permit is hereby granted to the above-designated
17	report and request that the information be	17	permittee to construct emission unit and/or air
18	incorporated into - or actually it says, you	18	pollution control equipment consisting of
19	know, "We are requesting the process modification	19	turbo-tunnel enclosure on the existing steel
20	be incorporated into the existing permit." So	20	pickling line and increasing a steel processing
21	the existing permit could be the operating permit	21	rate as described in the above-referenced
22	they were currently operating under.	22	application. This permit is subject to the
23	Q But a letter like this without an	23	standard conditions attached hereto and the
24	application wouldn't be regarded as an	24	following special conditions". And then it goes
	Page 75		Page 7
1	application?	1	1, 2, 3A, B, C, D, 4A, B, C, D, E, 5.
2	MR. WALSH: Object to form.	2	And number two it says, "This permit
3	THE WITNESS: A That letter would have been	3	allows operation of the pickling line at the
4	submitted with the test report.	4	rates and operational parameters specified in
5	MS. TIKALSKY: Q Right.	5	condition one only for the purpose of stack
6	A Right. But as part of the it could	6	testing required for Special Conditions 3." Is
7	be I — in my opinion, it could be considered	7	
8	part of the application because you're required	8	there anything in this construction permit that
9	- 10 전문 전문 전문 전문 - 10 전문 전문 전 10 M - 11 2 M - 12 M	9	allows operating
10	to submit that as part of the application to demonstrate what you're doing.	10	MR. WALSH: I'm going to object to form.
11	Q Okay, when and going back to the		MS. TIKALSKY: Q under this permit?
12	permit denial, is this a dead application?	11	MR. WALSH: The document speaks for itsel
13	MR. WALSH: Object to form.	12	THE WITNESS: A Can you rephrase the
14		13	question?
15	THE WITNESS: A What do you mean by "dead application"?	14	MS. TIKALSKY: Q Is there anything in
16		15	this these three pages that states it is an
17	MS. TIKALSKY: Q Well, is it no longer a	16	operating permit?
	live application waiting for information to be	17	MR. WALSH: Same objection.
18	submitted?	18	THE WITNESS: A Well, it says in condition
19	A I don't know. I think you have to ask	19	two that the permit allows operation of the
20	the Illinois EPA that.	20	pickling line at the rates and operational
21	Q Well, in that second paragraph it says,	21	parameters specified in condition one for the
22	"The Illinois EPA would be pleased to review a	22	purpose of stack testing.
23	re-application for this permit". Do you see	23	Q Only for the purpose of stack testing,
24	that?	24	correct?

21 (Pages 78 to 81)

	Page 78		Page 8
1	A Yes.	1	THE WITNESS: A I don't see anywhere it
2	Q So would you regard this as an operating	2	says that. I see limitations on the permit.
3	permit?	3	Q And you did state earlier that some state
4	A No.	4	operating permits may have limitations?
5	Q Okay.	5	A Yeah, any of them can.
6	(Counsel handed reporter a document)	6	Q And then to Exhibit Number 10 where the
7	(document marked)	7	top page says "Permit Denial", is that the letter
8	MS. TIKALSKY: We're getting there.	8	or
9	MR. WALSH: I'm sorry, is he looking at the	9	A The construction permit revised?
10	exhibit now? Because I don't have one.	10	Q 0237, NMLP 0237, that page, okay and
11	MS. TIKALSKY: Oh, here.	11	0238. On this document do you see anyplace where
12	MR. WALSH: Thanks.	12	this letter was sent to the permit section of the
13	MS. TIKALSKY: Q Okay, I'm representing	13	Illinois EPA?
14	that this is a letter to Valeriy Brodsky dated	14	A It doesn't list permit section on here.
15	March 23rd, 2007, from NACME Steel, John DuBrock.	15	Q And it's addressed to the Compliance and
16	You work with John DuBrock?	16	Enforcement Section, is that correct?
17	THE WITNESS: A Yes, I work with him.	17	A Yes. If I recall, I was working with
18	Q Right. It's regarding Change Request for	18	Julie Armitage due to a facility closure.
19	a FESOP application. And did you compose this	19	Q Yeah. And a couple of quick questions,
20	letter for him?	20	standard: Do you have a criminal record?
21	A I don't recall.	21	A No.
22	Q Can you summarize what this requested,	22	Q Do you Ever been sued before?
23	specifically asking?	23	A No.
24	A Sure. Basically, it appears to request	24	Q Sued anyone else?
	Page 79		Page 81
1	an increase in throughputs for the pickling	7	
2	process.	2	A Nope.
3	Q And earlier you stated that would be a	3	Q Are there any answers to my questions
4	change in operation, an increase of throughput,	4	that you wish to change?
5	material throughput, is that correct?	5	MR. WALSH: I'm going to object to the question until he reviews his deposition and has
	A Yes, if it was done. This is just		ducktion fill the reviews his denocition and has
6	i coj ii it mas done. I mis is just	6	a right to make a selections his deposition and has
6 7		6	a right to make such changes.
7	proposed.	7	a right to make such changes. MS. TIKALSKY: Not substantive. And that's
	proposed. MS. TIKALSKY: Okay, you want to chat?	7 8	a right to make such changes. MS. TIKALSKY: Not substantive. And that's what I'm asking.
7 8 9	proposed. MS. TIKALSKY: Okay, you want to chat? MR. GRANT: You want to call Maureen?	7 8 9	a right to make such changes. MS. TIKALSKY: Not substantive. And that's what I'm asking. THE WITNESS: A Not that I can think of at
7 8 9	proposed. MS. TIKALSKY: Okay, you want to chat? MR. GRANT: You want to call Maureen? MS. TIKALSKY: Um-hum.	7 8 9 10	a right to make such changes. MS. TIKALSKY: Not substantive. And that's what I'm asking. THE WITNESS: A Not that I can think of at this moment.
7 8 9 10	proposed. MS. TIKALSKY: Okay, you want to chat? MR. GRANT: You want to call Maureen? MS. TIKALSKY: Um-hum. MR. GRANT: And see if she's got anything?	7 8 9 10 11	a right to make such changes. MS. TIKALSKY: Not substantive. And that's what I'm asking. THE WITNESS: A Not that I can think of at this moment. MS. TIKALSKY: Q Do you have any other
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7 8 9 10 11 12 13 14	proposed. MS. TIKALSKY: Okay, you want to chat? MR. GRANT: You want to call Maureen? MS. TIKALSKY: Um-hum. MR. GRANT: And see if she's got anything? MS. TIKALSKY: Um-hum. MR. WALSH: We can just step out. MR. GRANT: Do you mind?	7 8 9 10 11 12 13	a right to make such changes. MS. TIKALSKY: Not substantive. And that's what I'm asking. THE WITNESS: A Not that I can think of at this moment. MS. TIKALSKY: Q Do you have any other information that I asked you about that you now recall that you did not earlier? MR. WALSH: I'll object. We've been sitting
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BRITT E. WENZEL October 17, 2013

22 (Pages 82 to 84)

	Page 82		Page 8
1	STATE OF ILLINOIS)	1	TOOMEY REPORTING 205 West Randolph Street
2) ss: COUNTY OF COOK)	2	Suite 1230
2	The within and foregoing deposition of		Chicago, Illinois 60602
3	the aforementioned witness was taken before	3	
4	NANCY K. SPEARE, C.S.R, and Notary Public, at the	4	WITNESS CERTIFICATION
5		5	I hereby certify that I have read the
6	place, date and time aforementioned. There were present during the taking	7	foregoing transcript of my deposition consisting
7		8	of pages 1 through 84 inclusive. Subject to the
8	of the deposition the previously named counsel.	9	changes set forth on the preceding pages, the
9	The said witness was first duly sworn and was	10	foregoing is a true and correct transcript of my
10	then examined upon oral interrogatories; the	11	deposition taken on 10-17-13.
11	questions and answers were taken down in	12	
12	shorthand by the undersigned, acting as	13 14	(Signed)
13	stenographer and Notary Public; and the within	1.0	BRITT E. WENZEL
14	and foregoing is a true, accurate and complete record of all of the questions asked of and	15	
15	answers made by the aforementioned witness, at	16	and the state of t
16		17	SUBSCRIBED AND SWORN TO
17	the time and place hereinabove referred to.	10	Before me this day of
18	The signature of the witness was not	18	A.D. 2013.
19	waived, and the deposition was submitted,	19	A.D. 2013.
20	pursuant to Rules 207 and 211 (d) of the Rules of	20	
21	the Supreme Court of Illinois, to the deponent	21	Notary Public
22	per copy of the attached letter.	22	A STATE OF THE STA
23 24		23	
	Page 83	24	
1	The undersigned is not interested in		
2	the within case, nor of kin or counsel to any of		
3	the parties.		
4	Witness my official signature and seal		
5	as Notary Public in and for Cook County, Illinois		
6	on this day of , A.D.		
7	2013.		
8			
9	NANCY K. SPEARE, C.S.R.,		
10	Notary Public		
10	License No. 084-001584		
11	THE STATE OF THE S		
12			
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A	17:15	46:9	apply 18:5	attention	57:11 58:9
ability 6:1	agriculture	anticipated	22:12 26:2	65:7	58:10,13,22
abovedesig	9:12	18:19 47:11	applying	attorney 2:1	60:16 62:8
76:16	ahead 13:2	73:23	19:7 22:6	audit 9:19	64:19 65:19
aboverefer	air 1:5 7:9	anticipating	approach	auditing 9:4	68:6,9
76:21	8:2,3,5 9:18	16:13	26:11	auditor 9:5	basically
accompany	10:2 14:5,9	anyplace	approved	9:13 10:18	9:16 10:4
74:1	15:4,6,11	80:11	72:24 73:5	audits 14:4	13:22 19:14
account 10:3	15:14,15	ap 20:13,16	approxima	14:10,24	32:13 46:7
accurate 5:15	17:14,23	apc 30:12,14	11:12 12:3	available	47:7 48:6,8
68:12 82:14	18:3,6,11	30:18	12:7,17	20:18 21:23	48:12 55:12
accurately	19:23 28:22	apologize	april 39:6	21:24 27:13	56:19 57:15
5:24 21:1	29:15,15	10:8 25:19	53:16 59:16	avenue 2:15	78:24
acid 45:3	37:3 38:4	appear 51:6	67:12 76:15	average 66:7	basics 4:23
act 9:23	40:14,18,18	appears 51:9	armitage	67:23	basis 16:5
13:23 29:21	43:23 46:5	54:12 56:19	80:18	aware 12:23	baths 73:21
72:11	50:14 51:20	61:17 71:6	articles 17:10	13:13 19:13	beach 73:11
acting 82:12	51:23 53:15	71:6 78:24	17:11	23:12 32:5	beat 21:16
activities	55:2 76:17	applicable	asked 81:12	39:6 64:15	beck 65:13
14:12 18:15	alcohol 6:10	1:11	82:15	81:17	began 36:21
	alleged 37:23	application	asking 78:23		36:22
18:23 28:19	allow 25:18	19:6,9,15	81:8,15	B	behalf 2:5,10
37:5,11	allows 23:14	19:18 22:4	aspect 37:9	b 8:23,24 9:1	2:13,18
62:23	77:3,8,19	26:5,6,9,17	aspects 31:14	77:1,1	believe 12:10
actual 20:7	ambient	29:5 30:8	assistance	bachelor	16:5 38:3
21:13 22:2	15:11	42:4,8	16:21	8:16	38:20 42:3
35:21 36:13	amount 63:7	43:24 44:16	assistant	back 41:4	42:6 58:17
45:8,22	andersen	46:13 49:9	39:16	75:11	64:5
add 22:19,20	64:6	53:16 54:6	associated	backcalcul	belong 11:2
33:22	annual 17:24	58:22 60:15	37:5	48:24	best 5:24
additional		60:21 64:8	association	background	better 15:15
22:19 34:18	69:3	64:16 70:23	The second of th	8:11	The state of the s
address 20:3	answer 5:14		17:15,24	backup 67:3	biological
addressed	5:16,21,22	71:3 72:7,9	assumed	bag 15:23	8:15,18,19
80:15	6:19,21	74:1,5,6,7	47:20,22	bakeries	biphenyl
administra	13:3 17:2,3	74:24 75:1	62:19 69:6	15:18	9:21
72:12	17:9	75:8,9,12	assuming	balance 20:5	bit 8:11 11:22
admissions	answered	75:15,17	68:20 71:12	20:19 21:22	19:5 21:14
20:1	5:24	76:4,9,22	assumption		blue 16:23
aforementi	answering	78:19	24:9 71:12	27:7	blythe 65:8,9
82:4,6,16	41:18	applications	atmosphere	bar 46:17,21	board 1:1,11
agency 8:2	answers 4:24	19:20 33:12		67:20	4:11
14:12 19:15	81:2 82:11	33:16 40:15	attached 65:6	based 19:9	bottom 44:22
26:11 46:4	82:16	40:18,19	65:6 76:23	23:24 48:13	53:24 55:6
ago 7:1,2	anticipate	41:20	82:22	54:12,14	59:17 60:24

61:8 65:16	69:23 70:1	checked 62:9	companies	confused	context 39:20
69:20 70:16	calculator	chemicals	21:6	43:1	contract 16:2
72:2	66:13	9:23	company	conservative	16:7
boulevard	calibration	chicago 1:14	16:11 18:6	22:1 58:1,4	contracted
2:11	67:4	2:4,8 84:2	18:10 23:7	consider	12:15
box 2:16	call 40:8 79:9	chloride	28:10,20	21:24 31:7	control 1:1
61:21 62:1	called 4:2	52:17 67:11	30:15 38:8	31:8	1:11 4:10
62:9	50:8 66:23	67:21	complainant	considered	9:22 22:21
break 36:16	calling 44:1	christopher	1:3 2:5	75:7	31:18 35:8
36:18 64:21	calls 31:12	2:2	complete	consistent	35:11,19
64:23 79:17	35:14 62:14	chrome 15:22	19:8,14	52:8	36:6,8,10
britt 1:8 3:2	candy 15:17	circumstan	22:4 41:13	consisting	38:19 45:14
4:1,7,21,22	cant 5:1,3	21:20 28:17	44:6 49:14	76:18 84:7	45:15,23
84:14	6:18 52:10	35:17	82:14	consolidate	47:3,11,12
brodsky	58:2	civil 4:12	completed	11:21	47:16,18,23
40:24 64:11	cap 30:5,13	clarify 35:2	40:15,19	construct	48:9,11,15
65:7,8	capacity 7:3	clear 18:18	compliance	76:17	48:16,17
78:14	32:15,16	client 21:8	9:20 11:9	constructing	53:10 55:1
bureau 2:1	37:15	40:7,8	14:4,24	28:14	56:1,11,13
business	care 43:14	clients 14:12	17:13 37:8	construction	56:14,18,2
73:24	carried 5:7	closely 34:22	67:12 74:2	19:9,16,17	59:24 60:7
	case 35:19	closure 80:18	80:15	22:5,6,9,11	60:11 62:1
C	49:5 83:2	coating 15:21	comport	22:12,14	63:14,22
c 1:9 77:1,1	certain 30:11	15:23	55:24	23:4,7,11	68:5,7,9,11
82:5 83:9	36:10	coatings	compose	24:2 26:6,8	68:13 69:13
calculate	certificated	20:21	73:15 78:19	26:14,16,21	69:15,16
27:13 48:13	10:19	code 72:12	concentrati	26:23 28:3	71:13 76:13
49:1 57:13	certification	cognizant 5:5	73:23	28:11,19	controlled
57:23 66:17	84:4	college 9:2	concerns	29:5,23	32:1 45:12
68:8 69:10	certifications	column 44:22	39:17,22	31:4 40:21	45:13 48:2
calculated	10:13,24	45:19 53:8	conclusion	40:24 41:2	49:1 58:8
35:10 36:10	certified 9:5	60:4 61:7	31:12 35:15	41:7,8,11	58:13 62:4
70:22	certify 84:6	61:13,20	condition	42:1,7	69:2
calculation	change 5:16	63:3,10	63:20 72:22	43:24 74:10	conversation
33:17 34:1	5:17 6:19	66:7 67:23	73:4 77:5	74:13 76:14	5:6,19
41:23 42:2	6:21 78:18	columns 45:5	77:18,21	77:7 80:9	conversatio.
54:13 55:8	79:4 81:3	come 5:13	conditions	consultations	19:10
56:12 58:9	changed 12:1	18:13 57:6	46:18 51:14	16:6	converted
68:18	changes 6:17	58:15 70:21	76:23,24	consulting	47:9
calculations	6:17 34:6	comes 5:18	77:6	14:4	cook 82:2
31:22,23	81:6 84:9	57:7	conducted	contact 17:8	83:5
33:13 34:10	chart 59:18	comit 32:14	40:7 65:13	19:2 21:10	copper 15:22
34:15 41:14	chat 79:8	commencing	conference	29:2	copy 42:23
46:15 47:6	check 61:24	1:14	17:24	contacts 21:7	43:17 44:6

					Page
82:22	cover 65:6	75:14 76:7	1:12 8:8	discovery 1:8	7:23 8:1
corner 51:12	covered 74:4	deal 39:18	described	1:13 4:7	71:22,23
59:18 65:16	cozza 65:8,9	decade 7:2	35:21 76:21	discuss 18:19	doesnt 8:23
69:21 72:2	creation 64:3	decide 33:21	design 21:6	18:22 19:3	46:4 58:12
corporation	criminal	deficiencies	32:15	21:10 29:3	63:16 80:1
1:6	80:20	72:20	determinat	discussed	doing 14:4
correct 16:10	current 10:22	degree 8:14	33:11 37:5	62:21 69:17	19:13 34:1
37:19 39:2	11:5 18:20	8:16	determine	discussing	42:2 69:5
45:17 51:23	23:14,17	delaware 1:6	18:16 21:13	64:10,13	71:4 75:10
51:24 54:16	24:1 49:17	delineation	27:2	disposal 15:2	dont 5:12,20
56:15 58:8	55:18,24	15:3	determines	divide 48:7	5:20 10:8
67:17,18,22	currently	delineations	35:12	58:6 66:20	12:8 16:5
72:3,20	11:6 74:22	9:11	determining	69:8,14	16:17 17:3
77:24 79:5	cut 70:3	demonstrate	15:10 19:24	divided 47:11	17:15 24:1
80:16 84:10	7 3 7 7 7 7	75:10	38:16 54:7	68:22 71:8	25:13 31:1
correctly	D	denial 72:2	developed	dividing	40:7 41:9
67:7	d 1:15 77:1,1	73:10 74:8	15:1	48:19,23	42:16 43:1
correspond	82:20 83:6	74:12 75:12	device 35:8	document 5:3	51:4 52:14
64:9	84:18	80:7	35:19 36:6	43:21 44:7	58:23 59:1
coughed	data 46:18	denied 72:9	36:8 38:19	44:9,11,15	
23:16	63:9 65:17	dep 43:8	60:11	47:1 49:7	60:14,17
couldnt	66:24 67:3	department	diagnostic	49:11,14	62:5,10,18
23:17	68:16 70:10	9:11	39:11		63:8 66:13
counsel 1:17	73:20	depend 23:1	diagnostict	50:6,10,13 50:22 51:1	66:24 68:1
6:16 59:8	database	34:2	38:17		70:5,14,19
78:6 82:8	20:15,17	depending	didnt 20:4	51:3,6	74:9 75:19
83:2	date 10:9,17	29:6 35:17	21:22	52:12,16	76:10 78:1
count 21:1	10:21 50:18	depends	difference	53:13,17,22	78:21 80:1
county 82:2	52:7 82:6	19:21 21:20	The state of the s	54:10 59:7	81:21
83:5	dated 49:9	27:5,12	38:24	59:9,11	drive 2:7
couple 37:22	53:16 59:16	34:17 40:6	different	60:19 62:11	drugs 6:10
74:10 79:18	60:23 67:12		5:13 11:16	62:12 64:1	drying 20:23
80:19	72:2 73:10	deponent	11:22 24:20	64:4 65:1,3	dubrock
course 21:20	78:14	82:21	26:12 27:8	65:5 67:9	78:15,16
	david 2:11	deposed 6:23	31:4 35:17	67:13 69:20	due 4:9 73:2:
courses 9:4	day 1:15	deposition	35:19 38:21	70:7 71:17	80:18
9:13	32:24 54:15	1:8,17 3:1	39:3 52:2,8	71:18 73:2	duly 4:3 82:9
coursework	58:3 62:22	4:7,13 6:2	70:2,2,21	73:9 77:11	-
9:15	83:6 84:17	6:22 7:6,14	71:4 74:10	78:6,7	E
court 4:11,24	The last transfer of the last	7:21 8:7	76:6	79:19,22,23	e 1:8 3:2 4:1
5:9 6:3,14	days 32:24	42:21 43:9	direction	80:11	77:1 84:14
22:23 23:16	54:15 58:3	81:5 82:3,8	21:8	documenta	earlier 5:14
42:10,13,16	62:22,24	82:19 84:7	directly	31:18 72:20	8:7 52:1
43:19 44:12	de 45:24	84:11	36:19	documents	62:21 69:1
71:20 82:21	dead 75:12	depositions	director 11:7	5:19 7:20	79:3 80:3

					Page
81:13	31:18,23	29:6 64:5	62:1,4,22	3:13,14,15	32:11
east 2:15	32:1,3,8	64:11	63:22 68:21	3:16,17,18	fact 70:5
education	33:14 34:18	engineers	76:18	3:19,20,21	factor 52:20
8:11	35:4,13,21	34:9,22	equivalent	3:22 4:13	52:24 53:5
edward 2:7	35:24 36:5	ensure 38:18	6:2	42:13,14,18	54:22 55:15
efficiency	36:13 38:16	entered 16:5	erms 10:3,4	43:12 44:1	55:19 56:1
47:11,12,16	39:9.14	entire 20:23	errors 6:18	46:14 49:6	56:9,11,19
47:18 48:17	46:3 47:2	31:1,8	ervine 4:21	50:4 53:12	56:23 57:8
54:19 68:11	47:10 48:13	53:22	4:22	59:5 60:18	58:12,14,15
68:13 69:13	48:21,24	environment	essentially	67:8 78:10	59:2 62:17
69:15,16	49:2,21,23	14:22	11:15	79:19 80:6	factors 20:7
either 10:21	51:23 52:17	environme	established	exhibits 3:10	20:12,14,18
52:11	52:23 53:15	2:1 9:4,5,6	20:6,13,15	8:3,4,6,7	21:23,24
elk 2:12	56:24 59:15	9:13,14	34:19 58:20	exist 29:16,18	27:6
email 70:6	59:24 63:22	10:14,18	59:3	existing	facts 4:16
emission 10:3	65:21,23	11:7,9,14	estimate 58:4	22:17 74:20	fair 16:8
20:6,13,18	67:21 68:4	12:16 14:7	everythings	74:21 76:19	fall 39:4
21:23 22:20	69:11 71:7	15:1 17:13	20:24	expect 76:8	far 13:13
27:6 31:22	72:23	29:21 37:7	exact 10:9	76:10	63:3 66:6
32:14 34:4	emit 32:6,9	72:11	exactly 17:16	experience	fax 65:5
37:23 38:19	32:11,12,17	epa 2:18 10:5	20:10 34:24	14:16	faxed 65:6
39:14 43:23	33:13,16	14:17 16:12	62:7 74:9	experts 21:9	february
45:7,8,23	34:10,20	16:23 19:12	examination	expiration	44:4 50:9
46:15 48:14	35:3,10,22	20:16 22:13	3:5 4:5	50:17 52:7	56:2,9
50:23 52:20	36:9 46:22	29:19 33:7	examined 4:3	explain 18:4	79:20
52:20 53:5	48:15 57:20	37:17 39:24	82:10	19:24 46:2	federal 9:16
53:7 54:8	64:16 66:18	40:4 58:21	example	47:4 56:16	49:17
55:7,15,19	68:9	65:7 67:2,7	34:11,13	explained	federally
56:1,19,22	emitted 20:24		examples	52:1	30:1,7,22
57:7,24	55:16	73:11,19	15:7 22:18	export 9:23	31:16 32:18
59:2,21	employee	75:20,22	exceed 52:18	exposure	32:19 49:10
61:17,20,24	39:23,23	80:13	exceedance	15:6 39:23	49:16 60:22
62:3,17	enclosure	equal 57:18	37:23	extent 31:12	79:24
63:11,13,15	76:19	equals 71:8	exceedingly	33233	fesop 31:7
63:19 67:12	enforceable	equation	22:1	F	40:23 51:10
69:1,2	30:1,7,22	20:6 27:8	execute 16:2	fabricating	52:9,15
70:22 73:4	31:17 32:18	48:7	exemption	15:19	78:19
76:17	32:20 49:10	equations	22:10	facilities 9:19	fesops 30:2
emissions	49:16 60:22	21:22	exercise	15:2,15,16	field 65:17
20:8,12	79:24	equipment	29:14	facility 37:24	figure 57:19
	enforcement	21:4,10	exhaust	38:1 39:17	file 13:5,6
21:2,4,13 21:13 22:2	1:5 80:16	33:22,23	38:16 60:4	40:10 64:17	29:4
23:24 24:24	engineer 19:3		60:6 68:6,7	80:18	files 12:24
	19:10 29:3	37:10 39:19	exhibit 3:12	facilitys	filing 18:8
27:3,13	19:10 29:3	37.10 39.19	exhibit 5.12		ming 10.0

					Page .
fill 30:8	30:12,13	56:24 65:20	45:1 46:14	70:22	72:6,10,11
filling 29:10	71:3	73:1,22	47:9 52:20	hours 24:24	72:15,17
29:13	formula	75:11 77:9	52:23 53:7	32:16,24	73:11,19
find 4:16	20:19 47:5	81:4	54:21 55:10	54:15 57:11	75:20,22
33:9 69:12	forth 84:9	good 53:22	55:15,21	58:3 62:22	80:13 82:1
fine 41:19	forward	graduate	56:7 57:2,9	66:15,17	82:21 83:5
43:14	19:11	10:10	58:7,11	68:21 81:15	84:2
finished	foundation	grand 2:15	59:21 60:4	hydrochloric	im 4:15 10:16
53:18	17:1	grant 2:2	61:8,18	45:2	11:7 13:9
fire 20:17	four 53:24	21:16 36:17	63:4,14	hydrochlor	13:13 15:19
first 4:2 18:9	free 5:16	42:22 43:3	66:3,12	44:17	17:20,21
18:14,15	full 14:6	43:6,8,13	71:7 73:22	hydrogen	18:1 20:4
29:2 72:6	1411 14.0	43:18 44:11	hdl 52:17	52:17 67:11	21:15 22:23
72:15 76:15	G	71:16 79:9	health 11:7,9	67:20	23:12,16,21
82:9	g 2:11	79:11,14	11:15 14:8		24:4,13
fish 9:9	gain 19:5	granted	39:16	I	25:20 26:19
five 30:2,4,24	gambit 14:7	76:16	hear 5:10	id 11:24 13:1	31:10,13
DO THURSDAY TO SEE THE PARTY OF	gaseous	group 11:9	23:17	46:12 50:4	32:9 35:14
31:6 51:1,6	54:21,24	11:15 38:8	heard 5:23	58:1 59:5	35:16 36:23
flavor 15:18	59:14	71:21	held 36:18	59:16 60:1	40:11,17
floor 2:8	general 2:1		64:23 79:17	73:8	42:7 43:1,1
flow 55:2	18:4 37:7	groups 11:22		iepa 55:6	43:19,22
foia 55:6	generally	grove 2:12	help 7:13	iii 2:7	44:18 47:13
following	21:21	guess 15:15	60:5 73:15	il 2:12	50:7 51:2
1:17 52:19	getting 25:18	26:19 30:23	helped 73:21	ill 5:4,13,17	51:19 53:12
65:12 76:24	70:10 78:8	31:13 34:16	hereinabove	42:22 44:5	
follows 4:4		62:15 65:19	82:17	44:12 49:13	53:14,18,21
foregoing	give 15:7	65:22	hereto 76:23	51:11 59:14	54:9 58:16
82:3,14	69:8	Н	hes 81:16	60:20 65:15	59:12 61:1
84:7,10	given 4:10		high 8:12	67:15 81:14	62:7 64:9
form 13:1	gives 4:18	habitat 9:10	22:1	네티네 집에 그 어려면 그 전하고 없습니다.	69:5 73:1
21:15 24:3	go 4:23 8:12	hand 71:4	higher 25:15	illinois 1:1,3	77:9 78:9
25:8 27:10	13:2 18:5	handed 44:11	hires 17:6	1:10,14 2:4	78:13 81:4
28:7 29:8	25:17 39:4	49:8 71:17	hold 12:4	2:8,16,18	81:8,17
29:17 30:14	42:22 48:18		13:15 14:19	4:10,11,12	impact 15:11
30:15,17,18	goes 20:20	handwriting	hour 45:6	8:13 10:5	implementi.
30:19 31:20	76:24	70:14	47:9 57:3	10:11 14:17	28:5,9
32:8 41:16	going 4:15	happens 4:14	57:10 58:8	16:12,23	import 9:23
49:19 51:7	8:10 16:6	hard 15:22	59:22 61:13	18:2,2	important
51:18 53:1	18:1,24	70:4	62:18 63:22	19:12 22:13	6:4
57:21 75:2	21:15 23:13		66:3,11,19	28:22 29:16	included 73:
75:13 77:9	31:10 34:5	10:20	67:24 68:22		includes
formal 16:6	34:18 35:14	hazardous	71:1,7	33:7 37:17	72:19
forms 29:11	42:7 49:1	15:8 37:4	hourly 45:7	39:24 40:4	including
29:13 30:11	51:2 54:9	hcl 44:17,23	57:24 61:17	58:21 65:7	18:7

		Q 10077		1	Page (
inclusive	40:12 45:9	33:12 34:8	66:16 67:5	52:3	60:20 62:16
84:8	instances	40:23,24		limit 24:8,10	79:21
incorporated	16:15 27:11	49:8 52:9	70:5,14	25:1,11,12	looked 56:3
32:17 74:18	32:2 33:4	59:13	71:1 74:19	25:14,15,23	62:16
74:20	36:10 41:15		75:19 76:10	25:24 46:7	looking 5:19
incorporati	50:3	J	knowledge	limitation	55:12 63:2
73:19		j 2:2,2	18:4	26:3	76:13 78:9
increase	35:12,13,24	john 78:15,16		limitations	looks 55:12
22:21,22	36:5,6,11	johns 43:6,8	L	24:18 32:15	56:20 70:6
23:13,17	interested	joint 41:8	12:14	32:22 46:8	lot 34:2 46:5
25:19,23	83:1	julie 80:18	lack 17:1	49:20 50:23	66:24 67:3
26:2,2,20	interpret 5:1		73:24	51:8 62:20	67:4 69:24
79:1,4	interrogato	K	landfill 15:8	80:2,4	70:20
increased	4:4 82:10	k 1:9 82:5	landfills	limited 1:6	lower 51:12
23:24	interrupt	83:9	15:19	limits 27:7	69:21 73:22
increasing	20:5	karyn 64:6	language 5:1	46:9 52:19	- in the play
76:20	involve 14:23	keep 49:4	lawsuit 4:18	linden 70:7,7	M
indicate	34:6	kept 10:20	lawyer 31:14	70:8	m 1:15
56:10	involved	kin 83:2	left 44:22	line 46:15	maam 61:10
indicated	12:19 14:8	kind 16:22	61:7	52:18 57:2	machines
16:21 39:15	15:5,9	19:5 31:17	legal 31:12	66:4 76:20	58:2
individuals	16:20 19:22	37:10 40:22	31:14 35:15	77:3,20	macro 65:13
12:20	21:3 28:18	50:12 70:1	letter 16:23	liquid 20:23	maintained
indoor 14:9	37:8 41:10	kinds 9:15	29:12 73:10	list 80:14	20:16
	58:17 59:3	31:4 37:1	73:13,17	listed 19:3	maintenance
information	64:3,7,9	38:21 52:2	74:15,23	listing 46:8	62:23
5:21 9:15	70:9	know 4:16	75:3 78:14	little 8:11	manage 11:8
30:16,16,17		5:12,16,20	78:20 80:7	11:22 19:5	managemen
30:20 37:16	involvement	9:17,18	80:12 82:22	21:14,21	9:10,18
37:18 64:12		10:8 11:22	level 46:1,3	23:22 59:18	14:3 15:1
70:13 71:2	isnt 27:14	15:8 16:17	levels 24:24	live 75:17	17:14,23
72:19 74:17	48:21	16:17,20	46:5	lle 1:6 4:9	37:4
75:17 81:12	The state of the s	17:3,5,22	liability 1:6	59:16 65:11	manager 9:6
infrastruct	issue 37:24	18:19,24	liaison 14:13	네 시간에 가득하면 생산을 하는 점점이 되었다.	9:14 10:14
14:22	issued 46:6	19:4,6	16:6	llp 2:6	11:14 12:2
inhibit 6:12	50:8 51:10	20,15 20 24	license 10:16	local 15:11	12:5,8,9
initial 7:24	74:11 76:15	21:6 23:1	10:19,20	long 7:1	13:18,19,2
33:9,18,23	79:20	30:18 34:6	7.071 7.06.7.3.2.2.2	11:11 12:2	13:23 70:8
37:13,20	issues 6:5,12	38:14,15	83:10	12:6,8,14	73:12
41:4,5	39:13	40:3 41:4	licenses	13:11	
inks 20:21	item 52:16	51:4 58:23	10:13,22	longer 10:17	managing 17:12
inlet 65:17	54:1 59:21	58:24 59:1	lifetime 29:23	, 5.10	The second secon
inspections	ive 17:12	62:10.19	31:5 33:15	look 31:1	manufactu
40:1	26:11 29:24	62:10,18	33:20,20	51:5 52:5	15:24
instance	30:6,10,11	63:8 65:9	49:22 52:3	54:4 55:14	manufactu

15:18	68:20	54:11	name 4:19,21	nope 81:1	numerous
march 49:9	mean 13:10	mixed 23:22	named 64:6	normal 28:17	30:10
78:15	20:4 28:8	modification	82:8	north 2:15	0
mark 42:10	29:18 32:12	22:18 26:9	nancy 1:9 2:2	northern	
44:12 50:4	32:19 36:6	29:4,8	44:18 64:21	8:13 10:10	o 2:16
59:5 67:8	38:6 40:17	74:19	82:5 83:9	notary 1:10	object 13:1
marked	43:11,12	modify 22:16	nashville	82:5,13	17:1 21:15
42:17,18,19	45:1 46:24	moisture	17:16	83:5,10	24:3 25:8
43:21 44:15	53:2 55:11	55:1	national 2:13	84:21	27:10,19
49:6,7 50:6	56:17 63:6	moment	10:15,16	note 49:13	28:7 29:17
53:13 59:7	65:18 75:14	81:10	16:3 17:7	50:17	31:10,11,20
60:19 65:1	76:2	monitoring	near 44:22	noted 72:20	35:14 41:16
67:9 71:18	meaning	14:10	49:4 61:7	notes 69:21	49:19 51:2
78:7	55:15	mostardi	necessarily	70:4	51:7,18
market 10:4	means 32:13	11:8 12:12	12:22 16:24	nothings	53:1 54:9
marking	47:2	12:18 13:11	21:12 33:2	26:23	57:21 62:14
43:19 53:12	measured	13:20 14:20	45:24 62:5	notice 4:10	73:1 75:2
mass 20:5,19	47:23 67:6	15:13 16:1	necessary	4:13 37:14	75:13 77:9
21:22 27:7	measureme	17:6 36:22	22:15 72:19	42:15 43:9	81:4,14
match 22:2	20:7,9	36:23 64:5	need 4:24	notices 43:3	objection
material 2:13	medication	70:9	6:20,21	notified	13:8 24:12
16:3 17:7	6:9	move 18:1	16:21 18:10	18:10	28:12 49:24
22:24 23:15	metal 15:19	36:19	18:11 22:11	notify 40:4	77:17
23:19 24:8	15:23	moving 11:5	23:4,7,11	73:21	objective
24:11,23	methods 67:7	multiply	24:1 25:24	nuances	18:24
25:11 27:21	mid2000	47:13 49:2	26:1,7	21:21	obtain 22:8
31:22 79:5	12:17 13:14	57:17 58:1	33:24 34:24	number	22:12 26:2
materials	36:21	66:14 69:7	69:12	17:15 24:20	occupation
16:5 18:21	middle 65:24	multiplying	needed 16:9	27:8 42:20	11:5
18:22 34:6	midnineties	48:20 57:7	needs 5:2	43:8 45:16	october 1:15
34:11	9:7 10:8		49:5	45:20 47:14	3:3 50:21
math 66:14	mind 79:14	N	negotiations	50:5 52:16	60:23
69:6	mine 70:16	nacme 1:5	14:11	54:2,4,18	office 2:1
mathemati	minimis	4:8 12:14	neshaps 10:2	58:6 64:24	officer 10:3
48:5,7	45:24	12:15,21	new 11:19	66:1 73:6	official 83:4
matter 4:8	minor 15:5	13:5,12,16	33:22 34:3	77:2 79:19	oh 42:18,19
maureen	minus 47:21	16:2,11,11	34:3	80:6	78:11
2:15 79:9	48:1,18	17:6,6,8	nmlp 51:13	numbered	okay 4:17,18
maximum	69:16 71:9	36:20 37:2	59:18 60:24		5:20 6:1,13
32:15,23	minutes	38:2,12	61:2 65:16	numbers	6:22 7:3,9
47:14 54:7	71:16	40:12,15,20		45:5 54:1	7:12 8:14
57:19,22	mischaract	50:16 59:4	73:9 74:8	56:5 70:2	10:18 12:2
61:11 66:15		59:15 65:11	80:10	70:21 71:5	16:22 24:6
66:17 68:19		73:11 78:15	nods 5:1	numeral 66:1	24:14,17

					Page
25:22 26:4	39:19 40:21		parts 23:20	49:10,16,17	31:2,9 33:9
26:10 27:2	41:8 46:18	p 1:15 2:14	pcb 1:4	49:18 50:8	33:11,18,23
27:24 28:2	49:10,16,18	2:16	people 1:2	50:14,14	34:20,23
31:10 32:8	49:22 50:8	page 3:5,11	4:8 11:23	51:9,14,17	37:3,7
33:6 37:1	51:14,17,21	44:16,17,19	15:12	51:21,21,22	55:19 58:17
42:16 43:22	51:22 52:2	44:20 46:12	perform	52:4,10	64:13
44:3,5,20	52:3,4,6,10	46:13 51:12	18:23 38:10	53:15 55:14	person 5:2
44:21 45:16	53:15 54:7	53:24 54:18	63:1	56:3,10	personal 37:
46:2,24	56:3 60:9	55:6,7	performed	58:21,24	personnel
47:24 49:3	60:22 66:15	60:23 61:1	12:21 14:24	60:22 63:19	17:9
50:17,22	66:17 68:11	61:4 65:16	59:15 72:23	64:11,13	pertaining
53:12 54:14	68:21 72:8	65:17 66:1	73:4	72:2,8,9,18	1:12
55:18 56:22	73:20 74:12	67:15 69:19	performing	73:3,10,20	phone 2:15
59:14 60:8	74:14,21,22	72:1 76:15	14:4	74:8,12,13	phonetic
61:3,6,19	77:8,16	80:7,10	permit 7:11	74:14,20,21	65:14
62:3 63:17	78:2 79:19	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	18:6,11	74:21 75:12	physical 6:5
65:24 67:8	79:24 80:4	pages 42:8 43:23 65:5	19:2,2,3,8,9	75:23 76:6	pickling
71:14,19	operation	TOTAL THE SECTION OF	19:10,16,17	76:14,16,22	15:17 46:14
75:11 78:5	35:9 36:11	65:6 67:11	19:20,23	77:2,7,10	52:18 73:21
78:13 79:8	52:17 57:12	76:13 77:15	22:5,6,9,12	77:16,19	76:20 77:3
79:21 80:10	60:11 62:19	84:8,9	22:15 23:4	78:3 79:20	77:20 79:1
81:23	77:3,19	paperwork	23:7,11,14	79:24 80:2	
once 6:24	79:4	18:7 29:11	23:18 24:1	80:7,9,12	piece 33:22
onsite 28:19	operational	29:14	24:2,7,10	80:14	33:23 34:3 62:21
open 46:17	77:4,20	paragraph	24:19 25:4		
46:21	operations	72:6,14	25:7,10,18	permits 8:2,3	place 39:4
operate 16:4	15:23 20:14	75:21	25:22 26:3	8:5 15:15	62:4 79:23
25:15 58:3	32:22 62:20	parameters	26:5,6,8,9	24:16 25:3	82:6,17
62:21 66:16	opinion 75:7	77:4,21	100 Dec 200 100 100 100 100 100 100 100 100 100	29:15,15,22	planning
69:7	option 27:15	pardon 11:18	26:14,17,22 26:24 28:3	29:24 30:2	14:5 37:3
operated	27:18	paren 47:24		30:3,4,5	plant 73:12
73:22	options 28:1	parenthesis	28:5,11,20	31:4,6 46:6	plants 9:19
operating	oral 4:3	56:13,14	28:22 29:3	46:8 49:22	plating 15:18
19:20 24:1	82:10	part 8:6 75:6	29:5,6,7,23	52:2,3,6,9	15:21,22,23
24:7,10,16	order 21:12	75:8,9	29:24 30:8	74:11 80:4	platt 11:8
24:19,24	organizatio	partial 67:11	30:22 31:5	permitted	12:12,18
25:4,7,10	11:3	participated	31:5,17	34:7 56:1	13:12,20
25:22 26:5		14:11	32:22 33:12	58:12,14,16	14:20 15:13
	organize 38:7	participating	33:15 34:9	63:11,15	16:1 36:22
28:20 29:24	originally	13:6	34:22 35:1	64:20	36:24 64:6
29:24 30:1	73:23	particular	40:19,24	permittee	70:9
30:8,22	oversee 13:22	42:8 46:24	41:2,7,8,11	76:17	play 5:18
31:5,6,17	ownership	particulate	41:13,20	permitting	please 27:16
32:16 33:15	30:19	54:23	42:2,8	9:19 14:5,6	36:2 41:17
38:18 39:12	oxidite 47:12	parties 83:3	43:24 46:10	18:3,17	pleased 72:17

					Page
75:22	47:8,9 53:5	procedure	13:21,23	published	49:2 56:23
point 21:8	55:10,15,21	4:12	19:4,21	17:10,12,19	57:24 59:22
48:18	56:7,20	procedures	21:21 35:13	purpose 1:13	61:17,20
pollutant	57:2,5,9,16	39:3 67:3	59:4 64:5	22:5 26:14	62:1,3,8
18:18	57:17,18	proceed	70:8 72:9	26:16 39:1	63:6,11,13
pollutants	58:7,10	19:11	projects	73:17 77:5	63:15,19
15:10 22:8	59:22 61:13	process 18:3	13:23,24	77:22,23	68:4 69:2,2
32:14 39:14	62:18 63:3	18:5,20,22	14:2,5 15:9	purposes	69:8 70:22
pollution 1:1	63:21 66:3	19:6,24	properly	70:23	76:21
1:10 4:10	66:11,22	22:3 28:22	38:19 39:12	pursuant	rates 18:22
7:11 76:18	67:24 71:1	28:23 29:3	39:19	1:10 4:9	24:24 38:10
polychlorin	71:7	30:16,17	property 7:7	82:20	77:4,20
9:21	pratt 2:11	34:20,24	proposed	put 46:7	raw 18:21,21
population	preceding	35:9,18	18:15 19:4	47:15 62:20	31:21 34:6
15:12	84:9	36:1,5,7	33:14 79:7	71:2	read 53:4
position	preparation	46:18 47:15	proposing	/1.2	
11:11,16	7:21	58:18 59:2	18:16 31:24	Q	72:5,7,15 74:8 84:6
12:1 13:15	prepare 7:13	64:10,14	protection	qualification	The state of the s
positions	present 1:16	70:10 74:19	29:21 72:11	53:21	reading
12:4 13:17	40:1,9 82:7	79:2	protective	qualify 59:14	62:12
14:19	presentation	processed	37:10	quality 14:9	realize 5:14
positive	17:14	55:11,14,17	provide	15:6	really 22:2
17:21	press 22:20	55:22 56:8	12:15 30:19	question 5:11	40:8 46:4
positively	presume 5:22	56:21 58:11	31:21 33:16	5:12,23	52:10
17:20	pretty 13:24	processes		17:4 18:14	realm 18:20
possible 27:9	34:22 38:9	34:23	34:4,14,21 34:24 42:7	24:5 25:21	reapplication
51:16	prevent 6:6	processing	The state of the s	32:10 51:20	72:18 75:23
possibly	previous	1:5 4:9	58:1,4	54:11 77:13	reasonable
13:18	34:20 70:24	50:16 59:16	63:18	81:5	24:9
post 8:12 9:2	74:4	65:11 76:20	provided	questions	reasons
potential	previously	produce 19:1	13:12 33:13	4:15 29:7	22:14
32:5,9,11	42:18,19		37:2	79:18 80:19	recall 5:18
32:12,13,17	82:8	professional 10:13 11:2	providing	81:2 82:11	12:8 17:16
33:13,16	print 42:22	17:11	13:16	82:15	17:18 37:21
34:10,19	43:10	ALCOHOLOGY AND	pt 33:24		41:9,24
35:3,10,22	printing	professionals 11:10	pte 34:15	quick 80:19	52:14 60:15
36:9 46:21	•	1 1 7 10 1 0 Thus	41:14,23	quite 25:20	60:17 70:19
47:2 48:13	15:17 22:20	program	42:2 57:23	R	74:9 78:21
	prior 12:24	30:23,24	68:12,18	r 1:9 70:7,7	80:17 81:13
48:15 57:20	13:6 22:10	31:2	public 1:10	82:5 83:9	81:16
64:16 66:18	47:2	programs	82:5,13	randolph	receive 16:12
68:8	proactively	31:9 38:10	83:5,10	84:1	received 10:5
potentially	17:12	project 12:5	84:21	rate 45:7,8,23	recognize
32:4 70:23	probably	12:7,9	publication		44:8 49:11
pounds 45:6	70:10	13:18,18,21	17:18,22	48:14,22,24	50:9 53:17

					Page 1
59:9,11,12	9:5,14	75:4	requires	28:21	54:19 55:7
65:2 67:13	10:14	reporter 5:1	30:19	right 5:8 6:16	55:10,18,21
71:22 73:12	regulated	5:9 6:14	reserve 6:16	15:21 16:24	56:13,14
recollection	18:18 22:7	22:23 23:16	81:22	18:1 23:6	57:2 59:21
74:4	regulations	42:10,13,16	resources	25:4,14	60:4 61:8
recommen	9:17,20,22	43:19 44:11	21:7	26:13,18	61:11,14,24
21:4	27:1	44:12 71:17	respondent	42:12 43:13	63:3,10,18
record 4:20	regulatory	71:20 78:6	1:7 2:10	43:16 48:10	63:23 64:1
43:15 44:6	27:7	reporting	responding	51:12 55:6	65:12,19
49:13 79:16	relate 8:23	37:4,5 84:1	37:15 64:12	56:12 60:24	66:7,9
80:20 82:15	related 7:7,9	represent	responds	62:17 63:3	67:20 68:2
recorded	15:4	61:16 67:10	29:6	64:2 65:16	72:6,7,14
70:11	relation 10:2	representing	response 8:1	66:6 68:15	74:14,18
recording	73:9	78:13	14:12 27:17	69:2,5,14	75:21 77:2
6:15	relationship	represents	rest 60:1,13	69:17,18,21	77:18 79:23
records 67:4	38:2	48:8	restricted	70:18 72:2	80:2,7
reduce 56:24	relatively	request 19:8	49:21	75:5,6 76:5	school 8:12
reduction	38:20	26:9,20,22	restrictions	78:18 81:6	8:12
10:4	remain 5:4	26:24 29:5	49:23	righthand	science 8:17
reed 2:6	remainder	29:8 41:3	result 34:18	59:17	8:20,21
reenforcea	48:12	58:22 73:19	67:16	rise 4:18	sciences 8:15
49:17	remember	74:15,16,17	results 47:8	roman 66:1	9:12
referenced	5:21 41:2	78:18,24	57:9 59:19	rosanne 70:8	scratch 71:4
72:8	41:22 42:2	requested	65:17 66:1	rules 1:11,12	scrubber
referencing	rememberi	34:9 37:18	return 15:13	4:11,11,12	38:18 39:13
38:1	6:6	43:21 44:15	review 6:16	82:20,20	47:13 54:1
referred 30:5	remind 5:7	49:7 50:6	6:19 7:20	running 70:2	55:19 56:1
82:17	renewal	53:13 59:7	13:5 46:6	rust 14:21	60:4,9
referring	40:23 42:4	65:1 67:9	52:12 72:18		65:17,20,2
20:10	49:9,15	78:22	75:22 76:4	S	68:7,13
reflect 45:6	52:13 60:21	requesting	76:11	s 1:9 8:23 9:1	69:12
reflected	64:8	70:12 74:19	reviewed	9:8,11 82:5	scrubbers
45:16	reorganiza	requests	12:23	83:9	68:10
reflects 45:7	11:17,19	29:12 30:15	reviewing	safety 11:8,9	se 36:24
45:22	repeat 5:11	30:17 37:15	53:18	11:15 14:9	seal 83:4
regard 78:2	rephrase	41:1 64:12	reviews	14:10 37:9	second 43:10
regarded	5:13 13:4	require 33:10	14:10 81:5	39:16,23	45:19 59:2
74:24	21:14 23:21	required	revise 34:13	saying 43:2	61:19 67:2
regarding	36:2 41:17	21:12 22:8	revised 50:8	56:22	73:6 75:21
65:12 78:18	77:12	26:21,23	76:14 79:20	says 44:23,23	section 44:19
regards 9:9	report 11:24	31:18 34:9	80:9	46:14,18,21	72:12 80:1
19:7,13	60:2,13	75:8 77:6	revision 34:1	47:4 49:15	80:14,16
37:9 39:13	67:12 73:18	requireme	53:16	50:16 51:12	sections
21.7 22.13	07.12 /5.10	18:17	revisions	51:13 53:5	72:10

	15.00	i	1	170	Page
see 46:15,20	shorthand	speak 4:24	standard	subject 18:16	37:23 38:1
47:24 52:20	82:12	5:2	30:12,14	37:6 76:22	supporting
54:1 60:1	shouldnt	speaks 51:3	51:13 76:23	84:8	66:24
61:9 62:2	41:5	54:10 73:2	80:20	submit 19:15	supreme 4:1
63:8,12,15	show 23:23	77:11	start 8:10	34:10 73:18	82:21
66:6 67:6	33:6,7,8	speare 1:9	13:17 28:13	75:9	sure 4:21
67:21,24	showed 56:10	82:5 83:9	started 11:21	submittal	9:16 13:5,9
68:17 70:11	showing	special 63:20	12:10 14:20	74:5,16	15:19 17:20
70:22 72:5	43:22 50:7	76:24 77:6	state 1:2 4:19	submitted	18:12 20:2
75:23 76:1	53:14	specific 19:21	30:1,7,22	8:2 28:4	20:4 24:4
79:11 80:1	side 15:6 55:7	22:9	31:17 44:5	75:4,18	25:20 26:19
80:2,11	sign 5:1	specifically	49:10,16,18	76:12 82:19	32:9 34:23
seen 26:11	signature	64:18 78:23	51:16 52:23	submitting	36:17,23
29:24 30:6	82:18 83:4	specified	53:2 60:22	19:17,20	37:3 39:12
30:10 52:9	signed 84:14	61:8 77:4	79:24 80:3	subscribed	39:18 40:17
59:13	site 49:21	77:21	80:3 82:1	84:17	43:18 51:19
sell 21:7	sitting 81:14	specify 44:23	stated 36:21	subsequent	53:21 56:6
send 16:13,17	situation	speculation	79:3	33:10	56:18 58:16
16:24 76:3	23:2 27:3,5	62:14	states 53:24	subsets 31:9	59:12 62:7
senior 12:5	27:12 35:6	spell 4:19	55:3,4	substance	64:22 67:1
13:18,21	35:20,23	spelling 6:18	67:16 77:15	9:22	
sense 30:6	36:4	spill 14:5	stating 27:17	substantive	67:6 74:9
sent 80:12	situations	37:3	steel 1:5 4:8	81:7	78:24
sentence	23:10	springfield	15:17 47:10	substrate	susler 2:11
72:16 73:6	six 12:3	2:16	47:14 50:16	20:23	sworn 4:3
service 9:9	smith 2:6	ss 82:1	52:19 55:10		82:9 84:17
72:24 73:5	soil 9:12	stack 20:11	55:17,22	subtracting 48:11	system 10:4
services	solvents	21:11,12,17	56:7,21		systems 15:1
13:12,16	20:22	23:8,11,20	57:8 58:11	sued 80:22,24	T
37:1	somewhat	23:23 27:9	59:15 63:4	suggest 19:11	take 29:9
set 24:18 38:4	21:5 37:8	27:14,17		suite 2:3 84:2	The professional and the second secon
38:6,9 84:9	sorry 20:4	38:4,10,10	63:7,7	summaries	36:16 56:23
seven 32:24	22:23 23:16	38:17,21	65:11 76:19	67:16	57:17,24
54:15 58:3	43:1 44:18	40:4,9 47:8	76:20 78:15	summarize	64:21
62:22 71:16	47:17 61:1	47:23 60:1	stenographer	78:22	taken 1:9 3:3
share 53:23	78:9	The second secon	82:13	summarizing	4:9 82:4,11
sheet 56:12	sounds 69:5	60:4,6,10	step 18:9	72:22	84:11
65:6	source 20:8,9	60:16 65:13	79:13	summary	talk 5:4 18:2
shell 5:7		65:20 67:1	stop 51:13	59:19 68:4	19:16 20:9
shes 6:15	22:7,10,11	68:6,14	storm 37:6	68:16	30:23 35:3
70:8 79:11	22:17 28:14	70:11 71:8	street 1:14	sums 14:15	40:14
	32:14 43:23	73:18 74:16	2:3 84:1	super 61:23	talking 19:18
short 36:16	53:15 54:8	77:5,22,23	study 39:10	supervisor	35:23 56:2
36:18 64:21	66:15,17	staff 12:10	stuff 8:5 14:7	11:24	technician
79:17	south 2:7	14:21	67:2 70:3	support	12:10 14:21

					Page 1
tell 18:3	35:3,8 38:9	62:5 64:19	49:8,15	tonnage	12:7 26:11
21:11 29:16	40:8 43:14	75:19 81:9	50:2,4,7	70:12	43:3 52:16
50:12 70:4	45:24 47:5	thinking	51:5,11,22	tons 45:20	62:15 66:1
79:22	47:10 48:16	18:11 39:7	53:4,12,14	47:14 53:6	77:2,19
telling 6:7	48:23 55:4	third 53:7	54:14 59:5	53:8 55:13	type 7:6 8:16
tennessee	56:22 58:11	60:23 61:5	59:8 60:18	55:16,22	14:10 15:16
17:17	61:13 64:1	thomas 73:11	60:20 61:2	56:21 57:8	21:13 34:17
term 32:5	66:23 68:15	thought 61:3	61:5,7	57:13 58:5	35:18,18
test 21:12,18	76:6 81:7	thousand	64:22,24	63:11,13,23	51:9
23:8,11,20	81:19	53:6 55:13	65:2 67:8	66:12,20	types 6:14
23:23 27:9	thered 33:22	55:16,21	67:10 71:17	68:22,23,24	9:14,20
27:14,18	theres 6:9	56:21	71:19,21	69:4,9	14:2 15:14
39:11 47:8	15:20 19:19	three 12:7	73:3 75:5	toomey 84:1	18:22 20:14
47:23 59:15	20:13,17	77:15 81:15	75:16 77:10	top 46:14	29:15,21
60:2,16	21:6 22:9	throughput	77:14 78:8	60:3,3	31:23 52:8
65:13 67:12	24:7 27:8	22:22,24	78:11,13	61:19 63:2	55:2
67:16 68:14	29:23 30:1	23:1,14,19	79:8,10,12	67:19 72:1	typically 16:4
69:13 70:11	30:2,11,18	23:24 24:9	79:16,18	80:7	19:2,8
71:8 72:23	31:6,7	24:11,23	81:7,11,19	toxic 9:22	20:20 21:5
73:4,18	38:21 39:13	25:1,2,11	81:23	10:2	26:1 28:18
74:3,5 75:4	39:15,17	25:11,23,24	time 5:3,4	track 70:10	29:4,13
testified 4:4	43:3 45:5	27:22 32:16	13:14 16:4	training 9:8	31:21 33:12
81:16	45:20 46:17	34:12 47:10	34:21 42:3	10:1,5	46:3 58:2
testifying	46:21 47:24	52:19 63:7	42:6 50:1	transaction	62:23 67:5
31:11	52:2 62:15	63:7 70:12	54:7 60:10	7:8	typo 55:13
testimony 6:3	62:20,23	79:4,5	64:16 68:13	transcript	56:21
27:20	69:20 74:10	throughputs	69:13 71:15	6:20 84:7	1 N. W. 1124.
testing 20:11	79:22	26:20 79:1	81:18 82:6	84:10	U
38:10,11,17	theyll 76:4	tikalsky 2:2	82:17	true 82:14	u 9:8,11
60:10 67:1	theyre 18:16	3:6 4:6 5:10	times 19:19	84:10	umhum 5:9
72:24 73:5	21:9 32:17	13:2,11	60:10 68:19	truth 6:7	16:16,19
77:6,22,23	37:6 46:7	17:2 21:17	70:1,20	try 5:6 34:21	54:3 58:19
tests 21:11	69:23	23:3,19	74:11	70:21	60:12 64:15
38:5,22	theyve 16:21	24:6,14	tiny 46:13	trying 56:4	66:2 71:14
40:4,9	38:14 62:19	25:10 27:14	title 11:6,16	tsca 9:22,24	71:20 79:10
thank 28:2	thing 29:2	27:21 28:10	11:20 12:1	turbotunnel	79:12
44:3,14,20	things 5:2,6	28:15 29:20	30:2,4,24	76:19	uncontrolled
49:3 81:19	5:19 6:6,18	31:16 35:20	31:6 51:1,6	turn 44:16	32:3 35:3,7
81:21	24:21 37:22	36:19 41:18	titled 53:15	46:12 51:11	48:24 56:22
thanks 42:24	62:24	42:12,14,19	today 7:14,21	53:23 55:5	61:20,24
61:6 78:12	think 14:15	42:24 43:16	todays 8:7,9	57:15 59:17	65:21,23
thats 4:14 6:3	23:5 34:2	43:22 44:4	ton 47:10	65:15 67:15	69:11
17:9 20:14	35:16 42:20	44:8,14,16	55:10 56:7	69:19 73:8	underneath
34:5,21	58:24 60:14	44:19,21	58:11 63:4	two 11:12	11:23

*	ta10.00	10
Pa	90	13
1 0	90	10

oray sastara.	Control of	in a same as	1		Page :
undersigned	violated	28:21 33:21	30:21 54:6	40:23	19:18,19
82:12 83:1	72:13	39:18 42:9	66:23	working	20:23 22:8
understand	violation	42:10,22	whos 70:7	12:11 14:16	27:17 29:1
5:6,12 6:3	7:24 14:11	43:15,16	wildlife 9:9	36:22 80:17	29:13 31:1
13:3,9 24:4	37:13,14,20	76:3 79:8,9	9:10	works 58:10	31:24 34:1
25:20 32:10	vs 1:4	wanted 22:16	wisconsin 9:3	wouldnt	38:1 47:6
51:20 56:4		25:19 34:13	wish 81:3	74:24	48:6,8,11
62:13	W	69:10	witness 4:2	wozniak 2:15	48:12,19,19
understand	wacker 2:7	washington	13:4,9 17:3	write 73:15	48:23 54:10
19:5 30:21	wait 55:18	1:13 2:3	21:19 22:24	writing 46:13	70:1 75:8
32:21 34:16	waiting 75:17	wasnt 7:9	23:5,21	70:16	75:10 81:1:
understood	waived 82:19	waste 9:18	24:4,13	wrong 62:9	youve 5:23
5:23	walsh 2:7	14:3,6 15:2	25:9,13		12:19,23
unfortunat	7:17 8:8	15:8 17:14	27:11,23	X	15:14 34:7
40:2	13:1,8 17:1	17:23 37:4	28:8,13	x 61:23	34:19 36:20
unit 21:4	21:15 24:3	water 14:6	29:18 31:13	(0/9/1/15)	55:1 71:1
22:19,21	24:12 25:8	37:6	31:21 35:16	Y	33.1 /1.1
34:4,8	27:10,19	way 5:13	36:23 41:17	yeah 11:21	Z
35:12,13,24	28:7,12	51:12 58:10	44:2,10,24	15:22 19:19	
36:5 76:17	29:17 31:10	ways 26:12	49:12,20	29:20 33:21	0
university	31:20 35:14	27:8,13	50:1,11	35:16 36:23	0 48:3,18,19
8:13 9:3	36:16 41:16	30:10,12	51:4,8,19	42:14,24	48:21 59:22
10:11	42:18 43:1	34:8 62:16		43:5,7,13	68:3 71:6,8
usage 31:22	43:5,7,12	week 32:24	53:2,18 54:12 57:22	43:14 47:22	00 71:16
use 21:17	43:14 44:1	54:15 58:3		48:7 69:4	000 57:8
27:6,6,7	44:3,5,18	62:22	59:10 61:10	80:5,19	0004 45:17
28:24 30:11	44:20 49:13	weeks 32:24	62:15 65:4	year 17:19	47:8
35:18 49:5	49:19,24	54:15	67:14 71:24	33:1 45:20	0008 65:16
uses 18:20	51:2,7,18	0.000.000	75:3,14	53:8 54:16	0048 55:21
uses 18.20	53:1 54:9	welding	77:12,18	57:5,11,14	57:1
V	57:21 61:1	15:19	78:17 80:1	57:16 58:5	0065 62:17
v 2:7	61:3,6	went 9:16,17	81:9,17	58:7 62:24	63:3
val 65:7	62:14 64:21	wenzel 1:9	82:4,9,16	63:11,13,24	
valeriy 64:11	73:1 75:2	3:2 4:1,8,21	82:18 83:4	66:12,20,22	0075 67:15
78:14	75:13 77:9	4:22 84:14	84:4		0171:8
value 58:1	77:11,17	west 1:13 2:3	words 18:17	68:23,24	012 68:2,3
values 71:4	78:9,12	84:1	work 5:7 7:4	69:4,9	71:6,6
varies 35:17		wetland 9:10	12:21,23	years 11:12	0233 72:1
varies 33.17	79:13,15	15:3	13:6 15:14	12:3,7	0234 76:13
	81:4,14,21	weve 16:5	17:5 19:7	17:15 38:14	76:15
74:11	want 8:10	37:8 38:15	21:22 34:22	yep 66:10	0235 76:13
versus 4:8	17:20 18:23	81:14	36:20 37:13	youd 67:5	0236 76:14
vicepresident	19:6 22:21	whats 18:21	78:16,17	68:12,22	0237 73:9
73:12	23:23 25:15	26:21 28:21	worked	69:12	80:10,10
village 2:12	25:23 26:2	28:23 30:14	15:16 34:8	youre 18:10	0238 73:9

				**************************************	Page 1
80:11	2	54:15 58:3	5	847 2:12	
0243 59:18	2 3:13 42:12	62:22	5 3:16 53:12	8760 66:15	
0291 60:24	42:13 43:20	24hour 62:19	72:10 77:1	68:19	
0385 55:6	44:1 71:8	25th 50:21	50 3:15	8th 50:9	
084001584	77:1	2601 46:14	52 32:24	79:20	
83:10	2000 37:14	28 73:10	54:15		
	41:5,7 42:1	291 61:2	53 3:16	9	
1	58:6 66:20		59 3:17	93:20 67:8	
1 1:15 3:12	68:22 69:8	3	597 65:13	68:9 71:11	
4:13 42:14	2001 50:9	3 3:14 49:6	377 03.13	72:10	
42:20 43:8	56:2,9	57:16,18	6	90 55:3	
43:12 44:13	79:21	77:6	6 3:17 59:6	951 63:10	
48:19,21	2002 38:15	30 1:15	60 3:18	99 47:19,22	
53:9 67:12	53:16 59:16	30th 49:9	600 57:16,18	48:3,11,17	
71:8 77:1	71:22 72:3	312 2:4,9	600072:12	48:18 55:3	
84:8	73:10 76:15	32 44:17,19	60602 2:4	56:23 68:9	
10 2:7 3:21	2005 41:6	44:20	84:2	71:9,13	
69:19 80:6	42:5 49:9	34 61:14	606067507		
100 48:8,18	50:21 60:15	63:21	2:8		
101713 84:11	60:23	35 46:13	627949276		
1021 2:15	2006 38:15	72:11	2:16		
11 3:22 54:18	47:8	3600 57:5,6	65 3:19		
54:18	2007 78:15	365 62:24	67 3:20		
11th 44:4	200 7 78.13 201 72:12	39 72:10	69 1:13 2:3		
53:16	2011 38:15	3a 77:1	051.152.5		
12 11:10 54:2	67:13		7		
54:4	2012 38:20	44	7 3:18 60:18		
1230 84:2	39:8 41:10	4 3:6,15 50:5	71 3:21		
1251 51:13	41:22 42:7	53:5,9	750 57:8		
12th 76:15	44:4,7	55:10,15	760 57:11,17		
160 72:12	1 .	56:7,20	58:2 69:7		
16th 59:16	2013 1:15 3:3 39:6 83:7	58:10 61:14	78 3:22		
72:3	84:18	63:21 71:16	7825544 2:17		
17 3:3	201312 1:4	79:19			
17th 1:15	201312 1:4 205 84:1	40th 2:8	8		
1800 2:3	205 84:1 207 82:20	41 57:9,17	8 3:19 53:5		
18th 60:23		58:7 66:9	55:10,15		
19 63:23	2071000 2:9	66:11 71:1	56:7,20		- Constitution of the Cons
19276 2:16	21 66:9,11	42 20:13,16	57:11,17	·	
1965 2:11	211 82:20	43 3:13	58:2,10		The state of the s
1988 10:12	217 2:17	44 3:12 45:20	64:24		
1993 12:13	59:22	46:1	8067273 2:12		
1998 17:21	223 74:8	49 3:14	81485672:4		,
	23rd 78:15	4a 77:1	84 84:8		
	24 32:24		- -		
		I		1	

TOOMEY REPORTING 312-853-0648

ATTACHMENT B

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 13 - 12 (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,)
Respondent.)

EXHIBIT E

VALERIY BRODSKY AFFIDAVIT

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE PEOPLE OF ILLINOIS,)	
Complainant,)	
v.	ý	PCB No. 13 - 12
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,))	(Enforcement – Air)
Respondent.)	

AFFIDAVIT

- I, Valeriy Brodsky, being duly sworn on oath, depose and state that I am over 21 years of age, have personal knowledge of the facts stated herein, and, if called as a witness, could competently testify to facts as set forth herein as follows:
- 1. I am currently employed by the Illinois Environmental Protection Agency

 ("Illinois EPA" or "Agency") as an Environmental Protection Engineer III, Bureau of Air,

 Permit Section, located at 1021 North Grand Avenue East, Springfield, Illinois. I have held this

 position from 1994 to the present. I was and continue to be the permit reviewer for Nacme Steel

 Processing, LLC
- 2. As an Environmental Protection Engineer III, my duties and responsibilities include, in part, review and recommend action on air permit applications, drafting correspondence and permits related to permit applications and ensure such activities are performed in compliance with the federal Clean Air Act, the Illinois Environmental Protection Act ("Act") and Pollution Control Board ("Board") regulations.

- 3. The April 2002 Stack Test shows the tons per hour (tph) of steel throughput that occurred during the stack test is based on 200 tons of steel pickled in a 6 hour period resulting in a calculation of 33.3 tph of steel throughput (process rate).
- 4. The April 2002 Stack Test results indicate the average HCL emission rate during the stack test to be .217 lbs/hr controlled emission rate. I calculated the PTE HCL (before control) on the maximum hourly controlled emission rate and the efficiency of the control at 99.90% efficiency stated in the 2002 Construction Permit and 2005 FESOP Application as the manufacturer's guaranteed efficiency result, which means that less than 1% of uncontrolled emissions are emitted. Thus, the measured or assumed negligible controlled emission shall be multiplied at least by 100 to get the uncontrolled emission rate value also known as PTE.
- 5. The emissions factor derived from the April 2002 Stack Test shows the HCL emissions factor to be 6.51 lbs. of HCl per 1,000 (10³) tons of steel throughput. The emissions factor is calculated as follows: 0.217 lbs HCL per hour controlled emission rate divided by 33.3333 tons of steel/hour equals .0065 lbs HCl/Ton of Steel.
- 6. In Nacme's September 2005 SOP Renewal Application Nacme calculated the HCL PTE controlled emission rate to be 1.8 tpy of HCL emissions based on Nacme's 2005 SOP allowances of 4.8 lb/1000 tons and a 750,000 tpy proposed process rate, instead of the controlled emission rate and actual steel throughput shown in its April 2002 Stack Test results, which was the most recent indication of HCL emissions at the Facility.
- 7. In December 2005, I informed Nacme that the Agency could issue a FESOP with a process rate no greater than 33.3 tons per hour ("tph") pursuant to the results shown in its April 2002 Stack Test but not at the process rate of 85.6 tph proposed in Nacme's 2005 FESOP Application.

- 8. On several occasions between December 2005 and January 26, 2012, when Nacme met with the Complainant in a prefiling meeting, the Agency requested Nacme to submit a construction permit application for Nacme's proposed annual maximum steel throughput process modification requested in its 2005 FESOP Application and 2007 FESOP Application.
- 9. On or about February 12, 2012, Nacme submitted a construction permit application requesting the process modification of 120 tph, which was equivalent to Process Modification requested in its 2007 FESOP Application.
- 10. Relevant calculations for the Facility permits, permit applications and stack tests include the following:

Steel throughput process rates:

Nacme's 2005 SOP: 600,000 tpy divided by $(24 \times 365) = 69$ tph

April 2002 Stack Test: 33.3 tph process rate x $(24 \times 365) = 292,000 \text{ tpy}$

Nacme's 2002 Construction Permit and 2005 FESOP Application: 750,000 tpy process rate divided by (24x365) = 85.6 tph process rate.

PTE HCL air emissions before control at the Facility:

0.217 lbs/hr air emissions after control x 100 = 21.70 lbs/hr x (24×365)

= 190,092 lbs/yr divided by 2000 lbs/ton

= 95.046 tpy of PTE HCL air emissions before control.

FURTHER, AFFIANT SAYETH NOT.

SUBSCRIBED and SWORN to Before me this 144 day Of May, 2014.

OFFICIAL SEAL DAWN A. HOLLIS

NOTARY PUBLIC, STATE OF ILLINOIS MY COMMISSION EXPIRES 8-19-2016

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD PEOPLE OF THE STATE OF ILLINOIS, Complainant, v. PCB No. 13 - 12 (Enforcement – Air) NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,

Respondent.

EXHIBIT F THOMAS J. REUTER AFFIDAVIT

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD PEOPLE OF THE PEOPLE OF ILLINOIS,

Complainant,

٧.

PCB No. 13 - 12 (Enforcement — Air)

NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,

Respondent.

AFFIDAVIT

- I, Thomas J. Reuter, being duly sworn on oath, depose and state that I am over 21 years of age, have personal knowledge of the facts stated herein, and, if called as a witness, could competently testify to the following:
- 1. I am employed by the Illinois Environmental Protection Agency (Illinois EPA), and serve as the Records Officer.
- 2. As part of my duties, I am responsible for the control, care, and safekeeping of the records of the Illinois EPA located in Springfield, Illinois.
- 3. When the Illinois EPA receives a document it is directed to the appropriate bureau for distribution and delivery to the designated program manager or staff member for review and action. Following program staff review and an y needed action, documents are submitted to the Agency file and include a file heading consisting of an ID number specifying the site/facility/source location, the site name and a records category. All Agency records are maintained and segregated according to the file heading.
- 4. I certify the following documents attached to this affidavit are "public documents kept in the file at the Illinois EPA:

- 1. February 8, 2001 Operating Permit No. 96020074 Revised ("Nacme's SOP")
- 2. April 11, 2002 Operating Permit Revision Application Revised ("2002 Construction Permit Application")
- 3. April 12, 2002 Construction Permit No. 01040081 Revised ("2002 Construction Permit")
- 4. April 16, 2002 Gaseous Emissions Test ("April 2002 Stack Test")
- 5. May 16, 2002 Permit Denial ("2002 Operating Permit Denial")
- 6. March 30, 2005 Application for Renewal of Federally Enforceable State Operating Permit submitted by Nacme ("April 2005 SOP Renewal Application")
- 7. April 13, 2005 Notice of Incompleteness ("April 2005 Notice of Incompleteness")
- 8. August 23, 2005 Air Emission Operating Permit Source Renewal Application ("September 2005 SOP Renewal Application")
- 9. September 20, 2005 Notice of Incompleteness ("September 2005 Notice of Incompleteness")
- October 18, 2005 Renewal Application Federally Enforceable State Operating Permit ("2005 FESOP Application")
- 11. December 6, 2005, CAAPP Application Completeness Determination of Source Fee Determination for Nacme's 2005 FESOP Application ("2005 CAAPP Application Completion Determination")
- 12. December 21, 2006, Hydrogen Chloride Emissions Test Report ("December 2006 Stack Test Report")
- March 23, 2007 Nacme's Change Request for FESOP Application ("2007 FESOP Application")
- 14. Construction Permit NSPS Source No. 12020035 ("2012 Construction Permit")

FURTHER, AFFIANT SAYETH NOT.

State of Illinois County of Sangamon

SUBSCRIBED and SWORN to before me this 15 day

<u>, 201</u>4.

OFFICIAL SEAL DAWN A. HOLLIS

NOTARY PUBLIC, STATE OF ILLINOIS MY COMMISSION EXPIRES 8-19-2016

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 13 - 12
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,) (Enforcement – Air))
Respondent.)

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 1
FEBRUARY 8, 2001 OPERATION
PERMIT No. 96020074-Revised ("Nacme's SOP")

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

P.O. Box 19506, Springfield, Illinois 62794-9506 Thomas V. Skinner, Director

217/782-2113

OPERATING PERMIT -- REVISED

PERMITTEE

NACME Steel Processing Attn: Tom Beach 429 West 127th Street Chicago, Illinois 60628

Application No.: 96020074
Applicant's Designation: PICKLING
Subject: Steel Pickling Plant
Date Issued: February 8, 2001

I.D. No.: 031600FWL Date Received: November 13, 2000

Expiration Date: October 25, 2005

Location: 429 West 127th Street, Chicago, 60628

Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of three hydrochloric acid storage tanks, one steel pickling line comprised of four process and four rinsing tanks, all of the above controlled by the scrubber, and one oil coater as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- This revised permit becomes effective only upon withdrawal of applicant's appeal to the Illinois Pollution Control, docketed PCB 01-85.
- The operation and hydrogen chloride (HCl) emission from the pickling line shall not exceed the following limits:

	Throughput (Tons/Yr)	Emission Factor (Lb/10 ³ Ton)		mission (Tons/Yr)
55,000	600,000	4.9	240	

These limits are based on the maximum production rate and emission factor derived from the most recent stack test. Operational parameters shall not exceed those during the stack test at which the emission factor was derived. Those are: steel process rate no more than 69 Ton/Hr, the highest HCl concentration in the pickling tanks 12%, the highest pickling solution temperature 190° F, HCl makeup rate no more than 235.3 Gal/Hr, and scrubber makeup water flow rate no less than 1.5 Gal/min. Compliance with annual limits shall be determined from a running total of 12 months of data.

3. This permit is issued based on negligible emissions of hydrogen chloride from the hydrochloric acid storage tanks. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

GEORGE H. RYAN, GOVERNOR

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- 4. This permit is issued based on negligible emissions of volatile organic material from the oil coater. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- 5. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
- 6. The Permittee shall monitor the following operational parameters:
 - a. HCl concentration in the pickling tanks every 4 hours;
 - Pickling solution temperature in each tank continuously;
 - c. HCl makeup rate continuously;
 - Scrubber makeup water flow continuously.
- 7. The Permittee shall maintain monthly records of the following items:
 - a. Steel throughput (Ton/Mo, Ton/Yr)
 - Hydrochloric acid usage (Gal/Mo, Gal/Yr) and its concentration (Wt.%);
 - c. Pickling line operating hours (Hr/Mo, Hr/Yr);
 - d. Monitoring devices records;
 - e. HCl emission calculations (Lb/Mo, Ton/Yr).
- 8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA request for records during the course of a source inspection.
- 9. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

10. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, IL 62794-9276

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

Illinois Environmental Protection Illinois EPA Division of Air Pollution Control 9511 West Harrison Des Plaines, Illinois 60016

It should be noted that this permit has been revised to add Condition No. 1.

If you have any questions on this permit, please contact Valeriy Brodsky at 217/782-2113.

en en la companya de la co

Bohald E. Sutton, P.E.

Manager of Permit Section

Division of Air Pollution Control

DES: VJB:psj

cc: Region 1



STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL 2200 CHURCHILL ROAD SPRINGFIELD, ILLINOIS 62706

STANDARD CONDITIONS FOR OPERATING PERMITS

July 1, 1985

1

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special permit condition(s).

- 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 with applicable local laws, ordinances and regulations.
- The Agency has issued this permit based upon the information submitted by the permittee in the permit application. Any misinformation, false statement or mispresentation in the application shall be grounds for revocation under 35 Ill. Adm. Code 201.207.
- 3. a. The permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Agency and unless a new permit or revision of the existing permit(s) is issued for such modification.
 - b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.
- 4. The permittee shall allow any duly authorized agent of the Agency, upon the presentation of credentials, at reasonable times:
 - to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emission of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.
- The issuance of this permit:
 - shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located.
 - 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 facilities,

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APC 151 Rev. May-93

- c. does not take into consideration or attest to the structural stability of any unit or part of the project, and
- d. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
- The facilities covered by this permit shall be operated in such a manner that the disposal of air contaminants
 collected by the equipment shall not cause a violation of the Environmental Protection Act or regulations
 promulgated thereunder.
- 7. The permittee shall maintain all equipment covered under this permit in such a manner that the performance of such equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.
- 8. The permittee shall maintain a maintenance record on the premises for each item of air pollution control equipment. This record shall be made available to any agent of the Environmental Protection Agency at any time during normal working hours and/or operating hours. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.
- 9. No person shall cause or allow continued operation during malfunction, breakdown or startup of any emission source or related air pollution control equipment if such operation would cause a violation of an applicable emission standard or permit limitation. Should a malfunction, breakdown or startup occur which results in emissions in excess of any applicable standard or permit limitation, the permittee shall:
 - a. immediately report the incident to the Agency's Regional Field Operations Section Office by telephone, telegraph, or other method as constitutes the fastest available alternative, and shall comply with all reasonable directives of the Agency with respect to the incident;
 - b. maintain the following records for a period of no less than two (2) years:
 - i. date and duration of malfunction, breakdown or startup,
 - ii. full and detailed explanation of the cause,
 - iii. contaminants emitted and an estimate of quantity of emissions,
 - iv. measures taken to minimize the amount of emissions during the malfunction, breakdown or startup, and
 - v. measures taken to reduce future occurrences and frequency of incidents.
- 10. If the permit application contains a compliance program and project completion schedule, the permittee shall submit a project completion status report within thirty (30) days of any date specified in the compliance program and project completion schedule or at six month intervals, whichever is more frequent.
- 11. The Permittee shall submit an Annual Emission Report as required by 35 Ill. Adm. Code. 201.302 and 35 Ill. Adm. code Part 254.

Environmental Protection Agency Bureau of Air

September 1, 1992

For assistance in preparing a permit application, contact the Permit Section:

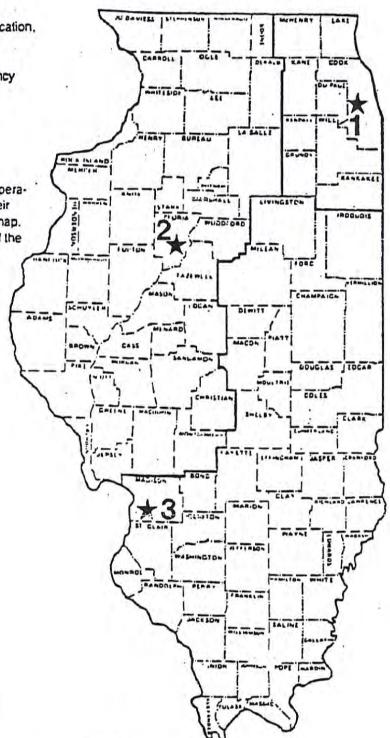
Minois Environmental Protection Agency Division of Air Pollution Control Permit Section 2200 Churchill Road Springfield, Illinois 6270£ 217/782-2113

Or contact a regional office of the Field Operations Section. The regional offices and their areas of responsibility are shown on the map. The addresses and telephone numbers of the regional offices are as follows:

ILLINOIS EPA
REGION 1
BUREAU OF AIR, FOS
9511 WEST HARRISON
DES PLAINES, IL 60016
847-294-4000

Illinois EPA Region 2 5415 North University Peoria, Illinois 61614 309/693-5461

Illinois EPA
Region 3
2009 Mall Street
Collinsville, Illinois 62234
618/346-5120



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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 13 - 12) (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,)
Respondent.)

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 2
APRIL 11, 2002 OPERATING PERMIT
REVISION APPLICATION-REVISED
("2002 CONSTRUCTION PERMIT")

IBD 5/22/00-> H. Dosa;

N

April 11, 2002

Mr. Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control
Illinois Environmental Protection Agency
Bureau of Air
1021 North Grand Avenue East
Springfield, Illinois 62702

Dear Mr. Sutton:

Enclosed please find two (2) copies of an Air Emission Source Operating Permit revision and construction permit request for the NACME Steel Processing facility (NACME) location at 429 West 127th Street in Chicago, Illinois (the facility).

The purpose of the request is to address a modification to the facility's (ID No. 031600FWL) pickling process that involves the installation of TurboTunnel or second, additional cover above the existing acid bath covers. The purpose of the second enclosure is to reduce hydrochloric acid (HCl) consumption during steel pickling operations by drawing exhaust air from the head space between the existing granite acid bath covers and the second enclosure rather than directly of the HCl pickling bath as is currently being done. This will reduce the HCl concentration being exhausted to the emission scrubber. In addition, no increase in emissions from the HCl storage tanks is anticipated above the current permitted rate of 0.1 pounds per hour and 0.44 tons per year since overall acid consumption is anticipated to be reduced.

NACME is also requesting only a slight increase in the process throughputs from the current steel throughput process limits of 55,000 tons per month and 600,000 tons per year to 62,500 tons per month and 750,000 tons per year. Based upon manufacturer's information, HCl emissions from the pickling process with the use of the TurboTunnel should not require revision of the current permitted emission factor of 4.8 lbs HCl per 1000 tons of steel processed. Therefore, based upon the use of this emission factor and the requested increase in steel throughput, NACME also requests the HCl emission limits as outlined in the current permit are increased to 300 pounds per month and 1.8 tons per year. Manufacturer's supporting documentation detailing the expected HCl concentration in exhaust gases with the use of the TurboTunnel is included in Enclosure A.

MECEWED

APR 1 - 2002

TEPA - DAPC - SFFLD



NACME STEEL PROCESSING L.L.C.

Illinois Environmental Protection Agency April 11, 2002 Project M016606 Page 2

documentation detailing the expected HCl concentration in exhaust gases with the use of the TurboTunnel is included in Enclosure A.

If you have any questions, please feel free to contact the undersigned or Mr. Britt E. Wenzel of Mostardi-Platt Associates, Inc. at (630) 993-2123.

Sincerely,

NACME STEEL PROCESSING

Thomas Beach

Vice President & General Manager

TB/

Enclosure



1520 Kensington Road, Suite 204
Oak Brook, Illinois 60523-2139
Phone 630-993-2100
Fax 630-993-9017
www.mostardiplattenv.com

AIR EMISSION SOURCE OPERATING PERMIT REVISION APPLICATION

Prepared for
NACME STEEL PROCESSING, INC.
429 West 127th Street
Chicago, Illinois

April 11, 2002

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MOSTARDI PLATT PROJECT M026002

TABLE OF CONTENTS

APC 200	
APC 210	3
APC 220	4
APC 260	
Process Flow Diagram	
Emission Calculations	14
Enclosure A (TurboTunnel documentation)	15
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STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL 2200 CHURCHILL ROAD SPRINGFIELD, ILLINOIS 62794-9276

	APPLICA CONST ME OF EQUIPMENT TO BE INSTRUCTED OR OPERATED (B)	TION FOR PERMIT _(A) RUCT OPERATE HCL Steel Pickling Line,	HCL-ASTs	LD. NO. PERMIT NO. DATE	FOR AGENCY 031 60 9602 4/12/6	OFWL
la.	NAME OF OWNER: National Mat	terials, LP	2s. NAME O	FOPERATOR:	ME Steel Proces	ssing, LLC
1b.	STREET ADDRESS OF OWNER: 1965 Pratt E	loulevard	2b. STREET	ADDRESS OF O		
lc.	CITY OF OWNER: Elk Grove	Village	2c. CITY OF	OPERATOR:	Chicago	
ld.	STATE OF OWNER:	le. ZIP CODE: 60007	2d. STATEO	FOPERATOR:	2e. ZIP C	ODE: 60628
3a.	NAME OF CORPORATE DIVISION OF NACME Steel Pro		3b. STREET	ADDRESS OF E	MISSION SOURCE:	Street
3c.	CITY OF EMISSION SOURCE: Chicago	3d. LOCATED WITHIN CITY LIMITS: YES NO	3e. TOWNSH	IP: 3f.	COUNTY:	3g. ZIP CODE: 60628
4. A	LL CORRESPONDENCE TO: (TITLE A		5. TELEPHON	E NUMBER FO	R AGENCY TO CAL 773-291-1303	L:
6. A	DDRESS FOR CORRESPONDENCE: (0	CHECK ONLY ONE) EMISSION SOURCE	7. YOUR DES	IGNATION FOR	THIS APPLICATION	N:(c)
8.	REMAINS TRUE, CORRECT AND EXECUTE THIS APPLICATION. AUTHORIZED SIGNATURE(S):(D) BY Thomas Out 1	AKES APPLICATION FOR A PERMIT CERTIFIES THAT ALL PREVIOUSLY CURRENT, BY AFFIXING HIS SIGN,		O HE FURTHER	APR 1	2002
	SIGNATURE Thomas Beach				iepa - Dapc	:-SPAGO
	TYPED OR PRINTED NAME OF Vice President, and Gener		The second second		NAME OF SIGNER	
(A) (B)	ENTER THE GENERIC NAME OF MAY BE ISSUED PURSUANT TO	AGENCY WITH GENERAL INFORMATEQUEST A CONSTRUCTION PERMIT THE EQUIPMENT TO BE CONSTRUCTION APPLICATION. THIS FORM MI	ATION ABOUT	NG PERMIT, A C	CONSTRUCTION OR	OPERATING PERMIT.
(C)	PROVIDE A DESIGNATION IN ITE	EM 7 ABOVE WHICH YOU WOULD L EFERENCED IN CORRESPONDENCE	JKE THE AGEN	CV TO USE FO	P IDENTIFICATION	OF MOUR FORMS
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(D)	AND SUPPLEMENTS THERETO SI	INED IN ACCORDANCE WITH 35 ILL HALL BE SIGNED BY THE OWNER A R AUTHORIZED AGENT, AND SHAL	AND OPERATOR	OF THE EMISS	A DO SOUTO MOTE	VIII TOUT T TERROOM

9,	DOES THIS APPLICATION CONTAIN A PLOT PLAN/MAP:				
	IF A PLOT PLAN/MAP HAS PREVIOUSLY BEEN SUBMITTED, SPECIFY AGENCY I.D. NUMBER 031600FWL APPLICATION NUMBER		20074		* .
	IS THE APPROXIMATE SIZE OF APPLICANT'S PREMISES LESS THAN YES NO: SPECIFY ACRES 43	1 ACR	E7		
10.	DOES THIS APPLICATION CONTAIN A PROCESS FLOW DIAGRAM(S)	THAT	ACCURAT	TELY AND CLEARLY REPRESENTS CURRENT F	RACTICE
lla.	WAS ANY EQUIPMENT, COVERED BY THIS APPLICATION, 11b. OWNED OR CONTRACTED FOR, BY THE APPLICANT PRIOR TO APRIL 14, 1972: YES NO	HAS PRE	ANY EQUI VIOUSLY F	JIPMENT, COVERED BY THIS APPLICATION, NO RECEIVED AN OPERATING PERMIT: NO	or
	IF "YES," ATTACH AN ADDITIONAL SHEET, EXHIBIT A, THAT:	IF "Y	ES," ATTA	ACH AN ADDITIONAL SHEET, EXHIBIT B, THAT	Г:
1	(a) LISTS OR DESCRIBES THE EQUIPMENT	(B)		OR DESCRIBES THE EQUIPMENT	
	(b) STATES WHETHER THE EQUIPMENT WAS IN COMPLIANCE WITH THE RULES AND REGULATIONS GOVERNING THE CONTROL OF AIR POLLUTION PRIOR TO APRIL 4, 1972	(b)		S WHETHER THE EQUIPMENT	
			(i) (ii) (iii)	IS ORIGINAL OR ADDITIONAL EQUIPMENT REPLACES EXISTING EQUIPMENT, OR MODIFIES EXISTING EQUIPMENT	
		(c)	COMME	DES THE ANTICIPATED OR ACTUAL DATES OF ENCEMENT OF CONSTRUCTION AND THE STA PUIPMENT	THE RT-UP OF
12.	IF THIS APPLICATION INCORPORATES BY REFERENCE A PREVIOUSI INFORMATION—INCORPORATION BY REFERENCE" BEEN COMPLETE YES NO	LY GRA	ANTED PEI	RMIT(S), HAS FORM APC-210, "DATA AND	
13.	DOES THE STARTUP OF AN EMISSION SOURCE COVERED BY THIS AS APPLICABLE STANDARDS: YES NO IF "YES," HAS FORM APC-203, "OPERATION DURING STARTUP" BEEN YES NO				ESS OF
14.	DOES THIS APPLICATION REQUEST PERMISSION TO OPERATE AN EM YES NO IF "YES," HAS FORM APC-204, "OPERATION DURING MALFUNCTION AT YES NO				
15.	IS AN EMISSION SOURCE COVERED BY THIS APPLICATION SUBJECT	TOAT	TUTURE CO	OMPLIANCE DATE-	
	YES NO				
	IF "YES," HAS FORM APC-202, "COMPLIANCE PROGRAM & PROJECT OF YES NO	COMPL	ETION SCI	HEDULE," BEEN COMPLETED FOR THIS SOURCE	CE:
16.	DOES THE FACILITY COVERED BY THIS APPLICATION REQUIRE AN EPLANS): YES NO	EPISOD	E ACTION	PLAN (REFER TO GUIDELINES FOR EPISODE A	ACTION
17.	LIST AND IDENTIFY ALL FORMS, EXHIBITS, AND OTHER INFORMATION NUMBERS OF EACH ITEM (ATTACH ADDITIONAL SHEETS IF NECESSARIAN)	ON SUI ARY):	BMITTED A	AS PART OF THIS APPLICATION. INCLUDE TH	E PAGE
	See Table of Contents				
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STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL 2200 CHURCHILL ROAD SPRINGFIELD, ILLINOIS 62794-9276

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	National Meteria	s L P.	2. NAME OF CORPORATE DIV. OR PLANT						
	3. STREET ADDRESS OF EMISSION SOURCE:	4. CITY OF EMISSION S	OURCE:	OWNER):NACME Steel Processing, LLC					
	429 West 127th Street		Chicago	5. IDENTIFICATION NUMBER:					
				031600FWL	╝				
1	6. APPLICATION NUMBER: 7.	CONSTRUCTION	OPERATION						
	QR02007A	DF CONSTRUCTION E		97_2.00	٦				
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.	IF "NO", LIST ITEMS TO BE INCORPORATED	:	•						
	9a, ITEM TO BE INCORPORATED:		b. PAGE	c. FLOW DIAGRAM DESIGNATION (IF APPLICABLE):	4				
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STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL 2200 CHURCHILL ROAD SPRINGFIELD, ILLINOIS 62706

This Agency is authorized to require this information under Illimois Ravised Statutes, 1979, Chapter 111 1/2, Section 1039, Disclosure of this information is required under that Section. Fallors to do so leavy prevent his from from being processed and could result in your application being denied. This form has been experoved by the Forms Management Conter.

*DATA A	ND IN	FOR	MATI	ON
PROCESS	EMIS	SION	SOU	RCE

*THIS INFORMATION FORM IS TO BE COMPLETED FOR AN EMISSION SOURCE OTHER THAN A FUEL COMBUSTION EMISSION SOURCE OR AN INCINERATOR. A FUEL COMBUSTION EMISSION SOURCE IS A FURNACE, BOILER, OR SIMILAR EQUIPMENT USED PRIMARILY FOR PRODUCING HEAT OR POWER BY INDIRECT HEAT TRANSFER. AN INCINERATOR IS AN APPARATUS IN WHICH REFUSE IS BURNED.

1. NAME OF PLANT OWNER: National Historials, LP		VISION OR PLANT (IF DIFFERENT FROM ME Steel Processing, LLC			
3. STREET ADDRESS OF EMISSION SOURCE: 428 West 127th Street	4. CITY OF EMISSION SOURCE: Chicago				
G	ENERAL INFORMATION				
5. NAME OF PROCESS: 6. NAME OF EMISSION SOURCE EQUIPMENT: HCL Steal Pickling Englosed Steel Pickling Line					
7. EMISSION SOURCE EQUIPMENT MANUFACTURER: PRO-ECO	8. MODEL NUMBER:	9. SERIAL NUMBER:			

10. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE:

SPL1

11. IDENTITY(S) OF ANY SIMILAR SOURCE(S) AT THE PLANT OR PREMISES NOT COVERED BY THE FORM (IF THE SOURCE IS COVERED BY ANOTHER APPLICATION, IDENTIFY THE APPLICATION):

N/A

12. AVERAGE OPERATING TIME OF EMISSION SOURCE:

24 HRS/DAY ZDAYS/WK. 52 WKS/YR.

13. MAXIMUM OPERATING TIME OF EMISSION SOURCE: 24 HRS/DAY Z DAYS/WK.62 WKS/YR

14. PERCENT OF ANNUAL THROUGHPUT:

DEC-FEB 25%

MAR-MAY 25%

JUN-AUG 28%

SEPT-NOV 25%

INSTRUCTIONS

- . COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
- 2. COMPLETE THE RAW MATERIAL, PRODUCT, WASTE MATERIAL, AND FUEL USAGE SECTIONS FOR THE PARTICULAR SOURCE EQUIPMENT. COMPOSITIONS OF MATERIALS MUST BE SUFFICIENTLY DETAILED TO ALLOW DETERMINATION OF THE NATURE AND QUANTITY OF POTENTIAL EMISSIONS. IN PARTICULAR, THE COMPOSITION OF PAINTS, INKS, ETC., AND ANY SOLVENTS MUST BE FULLY DETAILED.
- EMISSION AND EXHAUST POINT INFORMATION MUST BE COMPLETED, UNLESS EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
- 4. OPERATING TIME AND CERTAIN OTHER ITEMS REQUIRE BOTH AVERAGE AND MAXIMUM VALUES.
- 5. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS," APC-201.

:	DEFINITIONS
AVERAGE-	THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE, OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE, SPECIFICALLY:
AVERAGE OPERATING TIME-	ACTUAL TOTAL HOURS OF OPERATION FOR THE PRECEDING TWELVE MONTH PERIOD.
AVERAGE RATE-	ACTUAL TOTAL QUANTITY OF "MATERIAL" FOR THE PRECEDING TWELVE MONTH PERIOD, DIVIDED BY THE AVERAGE OPERATING TIME.
AVERAGE OPERATION-	OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.
MAXIMUM-	THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE, SPECIFICALLY:
MAXIMUM OPERATING TIME- MAXIMUM RATE- MAXIMUM OPERATION-	GREATEST EXPECTED TOTAL HOURS OF OPERATIONS FOR ANY TWELVE MONTH PERIOD. GREATEST QUANTITY OF "MATERIAL" EXPECTED PER ANY ONE HOUR OF OPERATION. GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

090-008

•	RAW MATERIAL INFORMATION							
NAME OF RAW MATERIAL			AVERAGE RATE PER IDENTICAL SOURCE			MAXIMUM RATE PER IDENTICAL SOURCE		
20s.	Steel Colls	ъ.	171,233	LB/HR	C.	171,233	LB/HR	
21s.	HCL Solution	b.	2,200	LB/HR	C.	2,200	LB/HR	
22 _{R.}	Water	b.	34,000	LB/HR	C.	34,000	LB/HR	
23a		b.		LB/HR	C.		LB/HR	
24aL		ъ.		LB/HR	С.		LB/HR	

·	PRODUCT INFORMATION							
NAME OF PRODUCT			AVERAGE RATE PER IDENTICAL SOURCE			MAXIMUM RATE PER IDENTICAL SOURCE		
30a.	Unscaled Steel Culis	ъ.	171,233	LB/HR	C.	171,233	LB/HR	
31a		Ъ.		LB/HR	c.		LB/HR	
32a,		b.		LB/HR	C.		LB/HR	
33a.		b.		LB/HR	C,		LB/HR	
34a.		ъ.		LB/HR	C,		LB/HR	

	WASTE MATERIAL INFORMATION								
	NAME OF WASTE MATERIAL , AVERAGE RATE PER IDENTICAL SOURCE				MAXIMUM RATE PER IDENTICAL SOURCE				
40a.	Ferrous Chloride	ь.	5,800	LB/HR	c.	6,800	LB/HR		
41a.		b.	,	- LB/HR	C,		LB/HR		
42a.		ь.	•	LB/HR	C.		LB/HR		
43 _E .		ъ.		LB/HR	C.		LB/HR		
44a.		b.		LB/HR	C.		LB/HR		

*FUEL USAGE INFORMATION — Not Applicable							
	FUEL USED		Ţ	ype	HEAT CONTENT		
50a.	NATURAL GAS		b.		c.	BTU/SCF	
	OTHER GAS					BTU/SCF	
	OIL					BTU/GAL	
	COAL					BTU/LB	
	OTHER		·			BTU/LB	
d aver	AGE FIRING RATE PER	IDENTICAL SC	OURCE: BTU/HR	c. MAXIMUM FIRING RATE PE	R IDENTICAL SOURCE:	BTU/HR	
		50B. NATURAL GAS OTHER GAS OIL COAL OTHER	50B. NATURAL GAS OTHER GAS OIL COAL OTHER	FUEL USED T 50n. NATURAL GAS	FUEL USED TYPE 50B. NATURAL GAS b. OTHER GAS COAL COAL	FUEL USED TYPE HEAT CONTENT 50B. NATURAL GAS b. c. OTHER GAS OIL COAL OTHER COAL OTHER COAL OTHER COAL OTHER COAL COTHER COAL COTHER COAL COTHER	

THIS SECTION IS TO BE COMPLETED FOR ANY FUEL USED DIRECTLY IN THE PROCESS EMISSION SOURCE, E.G. GAS IN A DRYER, OR COAL IN A MELT FURNACE.

	• EMISSION INFORMATION									
51. NUMBER OF ID	ENTICAL SOURCES (DESCRIBE AS RE	QUIRED):								
AVERAGE OPERATION										
CONTAMINANT	CONCENTRATION OR EMISSION RA	ATE PER IDENTICAL SOURCE	METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE							
PARTICULATE MATTER	SZa. GR/SCI	b. LB/HR	c.							
CARBON MONOXIDE	53± PPM (VOL	. 1	C.							
NITROGEN OXIDES	54a. PPM (VOL	3 ··· ·	C.							
ORGANIC MATERIAL	S5s. PPM (VOL) LB/HR	С.							
SULFUR DIOXIDE	56a. PPM (VOL		C.							
**OTHER (SPECIFY)	57s. PPM (VOL	1	c. See APC 260							
		MAXIMUM OPERATION								
CONTAMINANT	CONCENTRATION <u>OR</u> EMISSION RA	TE PER IDENTICAL SOURCE	METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE							
PARTICULATE MATTER	58a. GR/SCF		C.							
CARBON MONOXIDE	59a. PPM (VOL) LB/HR	C.							
NITROGEN OXIDES	60a. PPM (VOL) LB/HR	C.							
ORGANIC MATERIAL	61a. PPM (VOL	LB/HR	C							
SULFUR DIOXIDE	62a. PPM (VOL) LB/HR	C.							
**OTHER (SPECIFY)	63a. PPM (VOL	1	c. See APC 260							

ITEMS 52 THROUGH 63 NEED NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
 "OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

P.									
	***EXHAUST POINT INFORMATION								
	64. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT:								
	See APC 280								
65. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.):									
	66. EXIT HEIGHT ABOVE GRADE;	67. EXIT DIAMETER:							
			İ						
١	68. GREATEST HEIGHT OF NEARBY BUILDINGS:	69. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY:							
	<u> </u>		FT						
	AVERAGE OPERATION	MAXIMUM OPERATION							
	70. EXIT GAS TEMPERATURE:	72. EXIT GAS TEMPERATURE:							
	The state of the s		°F						
	71. GAS FLOW RATE THROUGH EACH EXIT:	73. GAS FLOW RATE THROUGH EACH EXIT:							
	ACFM		ACFM						

^{***} THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLLITION CONTROL EQUIPMENT.

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL 2200 CHURCHILL ROAD SPRINGFIELD, ILLINOIS 62706

This Agency is authorized to require this infurnation under illimits Revised Stantes, 1979, Chapter 111 1/2, Section 1039, Disclosure of this information is required under that Section. Failure to do an easy prevent this form from being processed and could restalt in your application being dealed. This form has been approved by the Forms Management Country.

	*DATA AND INFORMATION				
R	POLLUTI	ON CONTROL I	EQUIPMENT		

* THIS INFORMATION FORM IS FOR AN INDIVIDUAL UNIT OF AIR POLLUTION CONTROL EQUIPMENT OR AN AIR POLLUTION CONTROL SYSTEM.

I. NAME OF OWNER: NACME Steel Processing		2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): NACME Steel Processing	
3. STREET ADDRESS OF CONTROL EQUIPMENT: 429 West 127 th Street		4. CITY OF CONTROL EQUIPMENT: Chicago	
5. NAME OF CONTROL EQUIPMENT OR CONTROL SYSTEM: PRO-ECO Wet Scrubber) Wet Scrubber	

INSTRUCTIONS

- COMPLETE THE ABOVE IDENTIFICATION.
- COMPLETE THE APPROPRIATE SECTION FOR THE UNIT OF CONTROL EQUIPMENT, OR THE APPROPRIATE SECTIONS FOR THE CONTROL
 SYSTEM. BE CERTAIN THAT THE ARRANGEMENT OF VARIOUS UNITS IN A CONTROL SYSTEM IS MADE CLEAR IN THE PROCESS FLOW
 DIAGRAM.
- 3. COMPLETE PAGE 6 OF THIS FORM, EMISSION INFORMATION AND EXHAUST POINT INFORMATION.
- 4. EFFICIENCY VALUES SHOULD BE SUPPORTED WITH A DETAILED EXPLANATION OF THE METHOD OF CALCULATION, THE MANNER OF ESTIMATION, OR THE SOURCE OF INFORMATION. REFERENCE TO THIS FORM ANY RELEVANT INFORMATION OR EXPLANATION INCLUDED IN THIS PERMIT APPLICATION.
- 5. EFFICIENCY VALUES AND CERTAIN OTHER ITEMS OF INFORMATION ARE TO BE GIVEN FOR AVERAGE AND MAXIMUM OPERATION OF THE SOURCE EQUIPMENT. FOR EXAMPLE, "MAXIMUM EFFICIENCY" IS THE EFFICIENCY OF THE CONTROL EQUIPMENT WHEN THE SOURCE IS AT MAXIMUM OPERATION, AND "AVERAGE FLOW RATE" IS THE FLOW RATE INTO THE CONTROL EQUIPMENT WHEN THE SOURCE IS AT AVERAGE OPERATION.
- 6. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS", APC-201.

DEFINITIONS				
AVERAGE OPERATION-	THE VALUE THAT <u>SUMMARIZES</u> OR <u>REPRESENTS</u> THE <u>GENERAL CONDITION</u> OF THE <u>EMISSION SOURCE</u> OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY: OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.			
MAXIMUM- MAXIMUM OPERATION-	THE <u>GREATEST</u> VALUE <u>ATTAINABLE</u> OR <u>ATTAINED</u> FROM THE <u>EMISSION SOURCE</u> , OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY: THE GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.			

- ADSORPTION UNIT - Not Applicable				
I. FLOW DIAGRAM DESIGNATION(S) OF ADSORPTION UNIT:				
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:			
4. ADSORBENT: □ ACTIVATED CHARCOAL:TYPE	□ OTHER: SPECIFY:			
5. ADSORBATE(S):				
6. NUMBER OF BEDS PER UNIT:	7. WEIGHT OF ADSORBENT PER BED:			
8. DIMENSION OF BED: THICKNESSIN, SURFACE AREASQUARE IN				
9. INLET GAS TEMPERATURE °F	10. PRESSURE DROP ACROSS UNIT: INCH H ₂ O GAUGE			
11. TYPE OF REGENERATION: REPLACEMENT STEAM OTHER:SPECIFY:				
12. METHOD OF REGENERATION:				
ALTERNATE USE OF ENTIRE UNITS SOURCE SHUT DOWN OTHER: DESCRIBE	ALTERNATE USE OF BEDS IN A SINGLE UNIT			
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE			
13. TIME ON LINE BEFORE REGENERATION: MIN/BED	15. TIME ON LINE BEFORE REGENERATION: MIN/BED			
14. EFFICIENCY OF ABSORBER (SEE INSTRUCTION 4): %	16. EFFICIENCY OF ABSORBER (SEE INSTRUCTION 4): %			
AFTERBURNER - A	ot Applicable			
1. FLOW DIAGRAM DESIGNATION(S) OF AFTERBURNER:				
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:			
4. COMBUSTION CHAMBER DIMENSIONS: LENGTH IN, CROSS-SECTIONAL AREA SQUARE IN				
5. INLET GAS TEMPERATURE:	7. FUEL GAS OIL: SULFUR WT%			
6. OPERATING TEMPERATURE OF COMBUSTION CHAMBER: "F	8. BURNERS PER AFTERBURNER:@BTU/HR EACH			
9. CATALYST USED: NO YES: DESCRIBE CATALYST				
10. HEAT EXCHANGER USED: NO YES: DESCRIBE HEAT EXCHANGER				
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE			
11. GAS FLOW RATE: SCFM	13. GAS FLOW RATE: SCFM			
12. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): %	14. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): %			

IL 532-0260 APC 260 Revised 12/15/78

an an							
	CYCLONE - Not Applicable						
	1. FLOW DIAGRAM DESIGNATION(S) OF CYCLONE:						
,	2. MANUFACTURER	2. MANUFACTURER:		3. MODEL:			
	4. TYPE OF CYCLON SIMPLE	S. TYPE OF CYCLONE: SIMPLE MULTIPLE		5. NUMBER OF CYCLONES IN EACH MULTIPLE CYCLONE:			
	6. DIMENSION THE	APPROPRIATE SKETCH (IN INCHES) OR PROVID	E A DRA	WING WITH EQUIVALENT INFORMATION:			
	,						
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1		•					
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	•	•					
		•					
200							
	•						
1	•			·			
		AVERAGE OPERATION OF SOURCE		MAXIMUM OPERATION OF SOURCE			
	7. GAS FLOW RATE			9. GAS FLOW RATE:			
		SC	FM		SCFM		
	8. EFFICIENCY OF C	CYCLONE (SEE INSTRUCTION 4):	%	10. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4):	%		

	CONDENSER -	Not Applicable				
1. FLOW DIAGRAM DESIGNATION(S) OF CO	NDENSER:	100				
2. MANUFACTURER:	NUFACTURER: 3. MODEL NAME AND N		NUMBER: 4. HEAT EXCHANGE AR		AREA:	
AVERAGE OPERATION O	OF SOURCE		MAXIMUM OPER	RATION OF SOURCE		
5. COOLANT FLOW RATE PER CONDENSER		10. COOLANT FLOW	RATE PER CON	DENSER:		
WATER GPMAIR SCFM OTHER: TYPE FLOW RATE		WATER OTHER: TYPE		SCFM		
6. GAS FLOW RATE:	SCFM	11. GAS FLOW RATE			SCFM	
INLET°F, OUTLET°F INLE	S TEMPERATURE: T°F, OUTLET°F		TLET°F	INLET°F, C		
9. EFFICIENCY OF CONDENSER (SEE INSTR	UCTION 4):	14. EFFICIENCY OF	CONDENSER (SE	E INSTRUCTION 4):	%	
	*ELECTRICAL PRECIPI	TATOR - Not Applica	ble			
I. FLOW DIAGRAM DESIGNATION OF ELEC	TRICAL PRECIPITATOR:		A			
2. MANUFACTURER:	1,1,1,1,	3. MODEL NAME A	ND NUMBER:			
4. COLLECTING ELECTRODE AREA PER CO	NTROL DEVICE:				FI ²	
AVERAGE OPERATION	OF SOURCE		MAXIMUM OPE	RATION OF SOURCE		
5. GAS FLOW RATE:	SCFM	7. GAS FLOW RATE: SCFM				
6. EFFICIENCY OF ELECTRICAL PRECIPITA	TOR (SEE INSTRUCTION 4):	8. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4): %				
SUBMIT THE MANUFACTURER'S SPE		ICAL PRECIPITATOR	REFERENCE TH	E INFORMATION TO		
 ELECTRICAL PRECIPITATORS VARY G AMOUNT OF INFORMATION. THE APP INCLUDING ANY DRAWINGS, TECHNIC, INSUFFICIENT FOR FULL AND ACCURATE 	LICANT MUST, HOWEVER, SU AL DOCUMENTS, ETC. IF THE E ANALYSIS, THE AGENCY WIL	JBMIT WITH THIS AI E INFORMATION PROV L REQUEST SPECIFIC	PLICATION THE	E MANUFACTURER MANUFACTURER'S	S SPECIFICATIONS	
		Not Applicable				
1. FLOW DIAGRAM DESIGNATION(S) OF FIL	TER UNIT:	9				
2. MANUFACTURER:		3. MODEL NAME A	ND NUMBER:			
4. FILTERING MATERIAL:		5. FILTERING AREA				
6. CLEANING METHOD: SHAKER REVERSE AIR	☐ PULSE AIR ☐ PULSE JET	OTHER: SPECIFY				
7. GAS COOLING METHOD: 0 DUCTWORK: BLEED-IN AIR WATER SPRAY	OTHER: SPECIFY	N.	+			
AVERAGE OPERATION	OF SOURCE			RATION OF SOURCE		
8. GAS FLOW RATE (FROM SOURCE):	SCFM	12. GAS FLOW RAT		E):	SCFM	
9, GAS COOLING FLOW RATE: BLEED-IN AIRSCFM, WATT	ER SPRAY GPM		LIRSCFM	4, WATER SPRAY _	GPM	
10. INLET GAS CONDITION: TEMPERATURE°F, DEWPOINT _	°F	14. INLET GAS CON TEMPERATURE	DITION: E°F, DEWI	POINT*F		
11. EFFICIENCY OF FILTER UNIT (SEE INST	RUCTION 4) %	15. EFFICIENCY OF	FILTER UNIT (SE	EE INSTRUCTION 4):	%	

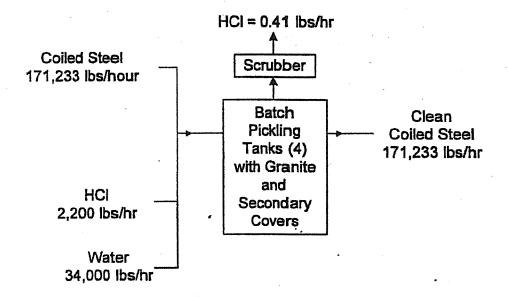
	1	CONTENT	The state of the s				
	SCRUBBEIR						
	1. FLOW DIAGRAM DESIGNATION(S) OF SCRUBBER: Pickling Line Wet Scrubber						
	2. MANUFACTURER: PRO-ECO	-	3. MODEL NAME AND N	UMBER:			
╟	4. TYPE OF SCRUBBER:						
	HIGH ENERGY: GAS STREAM PRESSURE DROPIN	CA FI V					
	PACKED: PACKING TYPE, PACKING SIZE, H						
-1							
_	SPRAY: NUMBER OF NOZZLES, NOZZLE PRESSUR						
HL	OTHER: SPECIFY — 4 Slave Tray - ATTACH DESCRIPTIO	N AND SI	LETCH WITH DIMENSION	5			
	5. TYPE OF FLOW: CONCURRENT COUNTERCURRENT CR	OSSFLOV	,	,			
	6. SCRUBBER GEOMETRY: LENGTH IN DIRECTION OF GAS FLOW 192 IN., CROSS-SECTION	NAL ARI	ea <u>13,824</u> square in.		-		
	7. CHEMICAL COMPOSITION OF SCRUBBANT:	Heavy D	uty FRP				
扩	AVERAGE OPERATION OF SOURCE			IMUM OPERATION OF SOURCE			
! -	B. SCRUBBANT FLOW RATE:	· · · · ·					
	1.5	GPM .	12. SCRUBBANT FLOW I	2 2	GPM		
	9. GAS FLOW RATE:		13. GAS FLOW RATE:				
	•	CFM		5,061	SCFM		
	10. INLET GAS TEMPERATURE:		14. INLET GAS TEMPERA	VTURE:			
IL	123	°F		125	°F		
I	11. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4):	•	15. EFFICIENCY OF SCRI	JBBER (SEE INSTRUCTION 4):			
1	99.90 % PARTICULATE 99.90 % GASEOUS		99.90 % PARTICUL	ATE 99.90 % GASEOUS			
ا ا							
IT	OTHER TYPE OF CO	NTROL FO	UIPMENT - Not Applica	blo	,		
′⊩	1. FLOW DIAGRAM DESIGNATION(S) OF "OTHER TYPE" OF CONTR						
.	LOW DISTORTION OF CHILLY THE OF CONTR	or Edou	MICIAI:				
	2. GENERIC NAME OF "OTHER" EQUIPMENT: 3. MANUFACT	TIREP.		A MODEL NAME AND AND ADDRESS.			
١,				4. MODEL NAME AND NUMBER:			
. 17	5 DESCRIPTION AND SKETCH WITH DIMENSIONS AND ELOW BA	TES, OF °C	THER EQUIPMENT:				
1 //	5. DESCRIPTION AND SKETCH, WITH DIMENSIONS AND FLOW RATES, OF "OTHER" EQUIPMENT:						
111	5. DESCRIPTION OF THE WITH DIVINING THE PERSON OF THE PERS				-		
	5. DESCRIPTION THE BREFER WITH DIVING SOID FROM THE		-	•			
	S. DESCRIE HOLVING BREICH, WITH DIVING BOILD FROM RE.		:				
			: ·				
	S. DESCRIE TON TAND BREFER, WITH DIVINISIONS PARD I DOWN RA.			•			
			:	•			
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			•	•			
			•	•			
	S. DESCRIE HOLVING BREFER, WITH DIVIDENCES PARE FROM RA	·	•	•			
	S. DESCRIE TON TAND BREFER, WITH DIVINISIONS PARE TECHNICAL			•			
	S. DESCRIE TON TON BRETCH, WITH DIVINISIONS PARE TECHNICAL		•	•			
			•	•			
				•			
				•			
			•				
		·					
	AVERAGE OPERATION OF SOURCE			MUM OPERATION OF SOURCE			
6	AVERAGE OPERATION OF SOURCE 5. FLOW RATES:		8. FLOW RATES:				
L	AVERAGE OPERATION OF SOURCE		8. FLOW RATES:GPM				

		TELL PARTE	MISSI	ON INFORMA	ATION		
1. NUMBER OF IDE	NTICAL CONTROL	UNITS OR CONTROLS	YSTE	MS (DESCRIE	E AS REQU	RED):	the same trade and a second second second second second second second second second second second second second
management (in the second)	The Administration of	AV		E OPERATION	The second second	E	
CONTAMINANT	CONCENTRATIO	ON OR EMISSION RATE	PER II	DENTICAL C	ONTROL	METHOD USED TO DETERMINE CONCENTRATION EMISSION RATE	
PARTICULATE MATTER	2a.	GR/SCF	b.		LB/HR	C.	
CARBON MONOXIDE	За.	PPM (VOL)	b.		LB/HR	c.	
NITROGEN OXIDES	4a.	PPM (VOL)	b.		LB/HR	C	Y
ORGANIC MATERIAL	5a.	PPM (VOL)	b.		LB/HR	C.	^
SULFUR DIOXIDE	ба.	PPM (VOL)	b.		LB/HR	C.	
OTHER (SPECIFY) HCL	7a.	PPM (VOL)	b.	0.41	LB/HR	C.	Emission Factor/Flow Measurements
		M	AXIMU	M OPERATIO	ON OF SOUR		
CONTAMINANT	CONCENTRATI	ON OR EMISSION RAT UNIT OR CONTROL	E PER	IDENTICAL C	CONTROL	меп	HOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	8n.	GR/SCF	b.		LB/HR	C.	
CARBON MONOXIDE	9a.	PPM (VOL)	b.		LB/HR	G.	
NITROGEN OXIDES	10a.	PPM (VOL)	b.		LB/HR	C.	
ORGANIC MATERIAL	lla.	PPM (VOL)	b.		LB/HR	C.	<u> </u>
SULFUR DIOXIDE	12a.	PPM (VOL)	b.		LB/HR	°C.	
OTHER (SPECIFY) HCL	13a. ·	PPM (VOL)	b.	0.41	LB/HR	C.	Emission Factor/Flow Measurements

**"OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

EXHA	UST POINT I	NFORMATION	
the contract of the contract o	Pickie Line :		
2. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION	Vertical	NGS, DIRECTION, HOODING, ETC.): Stack	
3. EXIT HEIGHT ABOVE GRADE: 70 FT		4. EXIT DIAMETER:	
5. GREATEST HEIGHT OF NEARBY BUILDINGS:	FT	6. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: 250	FT
AVERAGE OPERATION OF SOURCE		MAXIMUM OPERATION OF SOURCE	
7. EXIT GAS TEMPERATURE:	•F	9. EXIT GAS TEMPERATURE 125	°F
8. GAS FLOW RATE THROUGH EACH EXIT: 6.446	ACFM	10. GAS FLOW RATE THROUGH EACH EXIT: 6,526	ACFM

HCL PICKLING PROCESS AT MAXIMUM OPERATION FLOW DIAGRAM - SPL1



NACME STEEL PROCESSING 429 WEST 127TH STREET CHICAGO, ILLINOIS

HCL Pickling Line Emission Calculations NACME Steel Processing 429 West 127th Street Chicago, Illinotis

Maximum Operation Rate

Current Permitted Emission Factor (No Control)* = 4.8 lbs HCL/tons Steel Processed

Current Permitted Emission Factor (Scrubber Control)* = 0.0048 lbs HCL/1000 tons Steel Processed Testing w/ Scrubber Control)
Proposed Annual Steel Throughput = 750,000 tons/year

Emission Calculation

4.8 lbs HCl/ton Steel Processed X 750,000 tons Steel/year = 3,600 lbs HCl Emitted/Year HCL tons/yr = 3,600 lbs HCl/Year X 1 ton/2,000 lbs = 1.8 tons HCl/year

HCl lbs/hour = (3,600 lbs/year)/8,760 hours/year = 0.41 lbs HCl/hour

* Attached TurboTunnel Manufacturer's supporting documentation indicates HCl emissions to scrubber will be reduced with use of this second cover. Therefore, even with increased HCl concentration and throughput, this factor is a conservative value.

IEPA FOIA 0385

Project No.: M016006

ENCLOSURE A – TURBOTUNNEL MANUFACTURER'S DOCUMENTATION

B478057244 P.02/04
By H Wenz

Nelson Stee

199 Arvin Avenue Stoney Creek, Ontario Canada LSE 2L9

March 15, 2001

Fax #: 847-806-4721

National Material L.P. 1965 Pratt Blvd. Elk Grove Village, IL. U.S.A. 60007-5905

ATTENTION: MR. LANNY READ

Dear Lanny:

RE: FUME EXHAUST SYSTEM - NACME (Nelson Steel reference 2507-604)

The acid concentration of 16% hydrochloric acid in your #4 acid system is the required and normal operating concentration for the efficient pickling of the steel. The temperature of each pickling tank is important for pickling steel, for the efficient use of acid and for controlling the emissions of hydrochloric acid entering the scrubber system. The parameters that should be followed to achieve an efficient system are listed below:

TYPICAL OPERATING CONDITIONS

	% HCI	% Fe	Temp F
Pickling Tank No. 1	2 to 4	11 to 16	180 to 190
Pickling Tank No. 2	4 to 11	8 to 11	175 to 185
Pickling Tank No. 3	11 to 14	5 to 8	175 to 185
Pickling Tank No. 4	14 to 16	2 to 5	175 to 185

With the double cover system being installed, the concentration emissions of hydrochloric acid will improve drastically. Outlet concentrations of hydrochloric acid depend on inlet concentrations to the scrubber. As such, the operation of the pickling section will affect the outlet concentration from the scrubber; however, data from similar installations has shown concentrations less than 5 PPM when using the double cover system. The main reason for this improvement is the fact that fitness are presently extracted from the acid surface. Extraction of fumes will presently take place above the granite covers and not at the acid surface. See attached sketch to indicate the new design.

cont'd../2

Nelson Steel

Mr. Lanny Read March 15, 2001 Page 2

As a comparison, the following data is taken from two of Nelson Steel's own pickling lines. Each line has four pickling tanks but only one line has the double cover system.

Without double covers
(5-tray scrubber)

Scrubber inlet
concentration
(PPM)

2421

Scrubber outlet
concentration
(PPM)

18

3

I hope that this letter explains sufficiently the necessity for operating the pickling tanks at a 16% hydrochloric acid level and explains the improvement that will occur with regard to emissions with the new double cover system.

Please do not hesitate to contact me at 905-662-1807, extension 325, if you require clarification on any items.

Best regards,

Graham Oakley

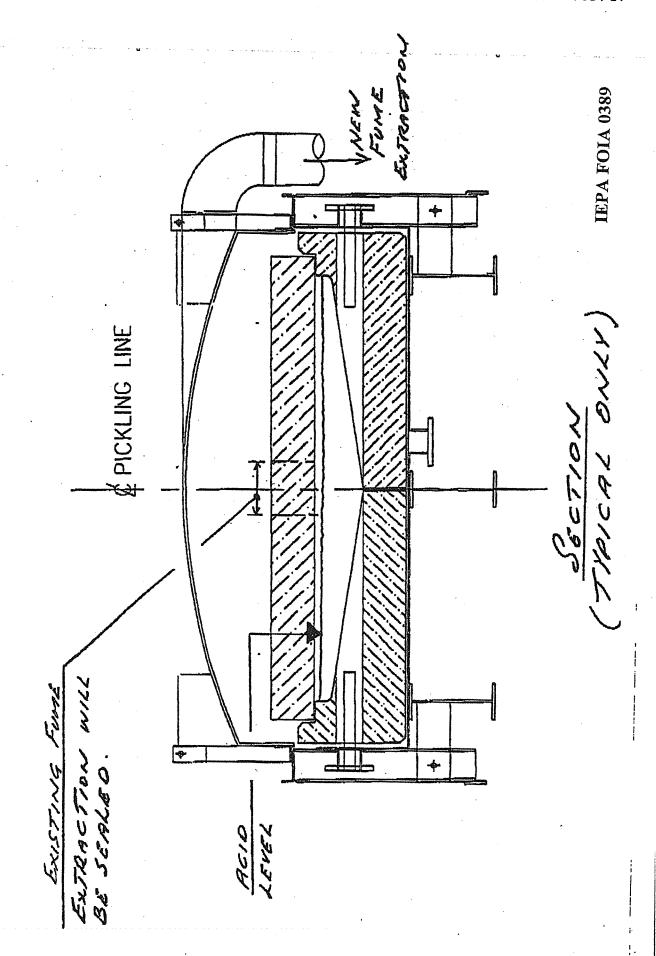
General Manager, Technology Group

:dnr

enc.

cc: John Mercer

iVSOTempyrener(.db.La.)1401. wml



BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,) .
Complainant,)
v.) PCB No. 13 - 12) (Enforcement – Air)
NACME STEEL PROCESSING, LLC,) (Emolecment 'An')
a Delaware limited liability corporation,)
Respondent.)

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 3 APRIL 12, 2002 CONSTRUCTION PERMIT NO. 01400891-REVISED ("2002 CONSTRUCTION PERMIT")

CONSTRUCTION PERMIT -- REVISED

PERMITTEE

NACME Steel Processing, LLC Attn: Tom Beach 429 West 127th Street Chicago, Illinois 60628

Application No.: 01040081
Applicant's Designation: PICKLING
Subject: Turbo-tunnel Enclosure

Date Received: April 11, 2002

I.D. No.: 031600FWL

Date Issued: April 12, 2002

Location: 429 West 127th Street, Chicago, 60628

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission unit(s) and/or air pollution control equipment consisting of turbo-tunnel enclosure on the existing steel pickling line and increasing of steel processing rate as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. The operation and hydrogen chloride (HCl) emission from the pickling line shall not exceed the following limits:

Steel Throughput		Emission Factor	HCl E	mission
(Tons/Mo)) (Tons/Yr)	(Lb/10 ³ Ton)	(Lb/Mo)	(Tons/Yr)
62,500	750,000	4.8	300	1.8

These limits are based on the maximum production rate and emission factor derived from the most recent stack test. Operational parameters shall not exceed the following values: steel process rate no more than 85.6 ton/hour, the maximum HCl concentration in the pickling tanks 16%, the maximum pickling solution temperature 190° F, HCl makeup rate no more than 236 gallon/hour. Compliance with annual limits shall be determined from a running total of 12 months of data.

- This permit allows operation of the pickling line at the rates and operational parameters specified in the Condition 1 only for the purpose of stack testing required by Special Condition 3.
- 3a. Within 30 days of issuance of this permit the emission of Hydrogen Chloride (HCl) shall be measured by an approved testing service, during conditions representing the maximum HCl emission. This condition supersedes Standard Condition 6b.

b. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the Illinois EPA. Refer to 40 CFR 60, Appendix A, and 40 CFR 61, Appendix B, for USEPA test methods.

Location of Sample Points

Gas Flow and Velocity

Flue Gas Weight

Moisture

Hydrogen Chloride (HCl)

USEPA Method 2

USEPA Method 3

USEPA Method 4

USEPA Method 26

- c. At least 30 days prior to the actual date of testing a written test plan shall be submitted to the Illinois EPA for review and approval. This plan shall describe the specific procedures for testing, including:
 - The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - ii. The conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum operating rate, the levels of operating parameters at or within which compliance is intended to be shown, if applicable, and the means by which the operating parameters for the process and any control equipment will be determined.
- d. The Illinois EPA shall be notified prior to this test to enable the Illinois EPA to observe these tests. Notification for the expected date of testing shall be submitted a minimum of thirty (30) days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of five (5) working days prior to the actual date of the tests. The Illinois EPA may, at its discretion, accept notification with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe the testing.
- 4. The Final Report(s) for all tests shall be submitted within 30 days after the date of the test. The Final Report shall include as a minimum:
 - a. General information describing the test, including the name and identification of the emission source which was tested, date of test, names of personnel performing the tests, and Illinois EPA observers, if any;
 - A summary of results;
 - c. Description of test procedures, including description of sampling points, test equipment, and test schedule;

- d. Detailed description of test conditions, including:
 - Process information, i.e., process rate, raw materials type, fuel type, etc.
 - ii. Control equipment information, i.e., equipment condition and operating parameters during testing.
- e. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
- 5. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Illinois EPA Division of Air Pollution Control Compliance and Enforcement Section (#40) P.O. Box 19276 Springfield, IL 62794-9276

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

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

It should be noted that this permit has been revised to extend time allowed for performance of stack test.

If you have any questions on this permit, please contact Valeriy Brodsky at 217/782-2113.

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

DES: VJB:psj

cc: Region 1

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 13 - 12 (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,))
Respondent.)

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 4
APRIL 16, 2002 GASEOUS EMISSIONS
TEST ("APRIL 2002 STACK TEST")



GASEOUS EMISSIONS TEST

Performed For NACME STEEL PROCESSING, L.L.C.

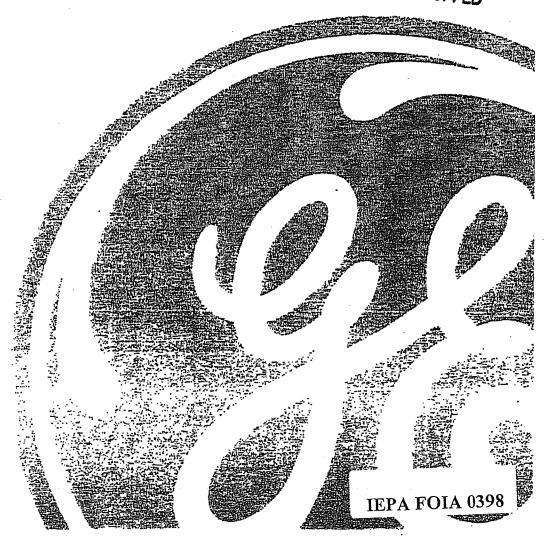
At The
HCl Scrubber Exhaust Stack
Chicago, Illinois

April 16, 2002

RECEIVED

SEP 1 2 2005

IEPA - DAPC - SPFLD





GE Mostardi Platt — A division of GE Energy & Industrial Services, Inc. 808 Industrial Drive, Elmhurst, IL 60126 630 993-9000, Fax: 630 530-6630

GASEOUS EMISSIONS TEST
Performed For
NACME STEEL PROCESSING, L.L.C.
At The
HCl Scrubber Exhaust Stack
Chicago, Illinois
April 16, 2002

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GE MOSTARDI PLATT PROJECT 20020303 DATE SUBMITTED: MAY 17, 2002

TABLE OF CONTENTS

CERTIFICATION SHEET.	***********
I.0 INTRODUCTION	1
2.0 SUMMARY OF RESULTS	
3.0 DISCUSSION OF RESULTS	2
4.0 TEST PROCEDURES	2 2
4.3 Hydrogen Chloride (HCl) Determination (Isokinetic Sampling)	3
5.0 QUALITY ASSURANCE PROCEDURES	4
6.0 TEST RESULTS SUMMARY	5
APPENDIX Plant Operating Data Test Section Diagram	7 8
Sample Train Diagrams	9
Sample Analysis Data	15
Test Data and Results (Computerized)	16
Field Data Sheets	

CERTIFICATION SHEET

Having supervised and worked on the test program described in this report, and having written this report, I hereby certify the data, information, and results in this report to be accurate and true according to the methods and procedures used.

Data collected under the supervision of others is included in this report and is presumed to have been gathered in accordance with recognized standards.

GE MOSTARDI PLATT

James F. Robertson Project Manager

Reviewed by:

Jeffref M. Crivlare Senior Project Manager

M. Culin



GE Mostardi Platt

--- A division of GE Energy & Industrial Services, Inc.
888 Industrial Drive, Elmhurst, IL 60126
630 993-9000, Fax: 630 530-6630

GASEOUS EMISSIONS TEST Performed For NACME STEEL PROCESSING, L.L.C. At The HCl Scrubber Exhaust Stack Chicago, Illinois April 16, 2002

1.0 INTRODUCTION

GE MOSTARDI PLATT, a division of GE Energy and Industrial Services, Inc. (GE Mostardi Platt) performed a gaseous emission test program on the HCl Scrubber Exhaust Stack of NACME Steel Processing, L.L.C. (NACME) in Chicago, Illinois on April 16, 2002. The tests were authorized by and performed for NACME.

The purpose of this test program was to determine hydrochloric acid (HCl) emission rates during normal operating conditions.

The tests were conducted by Messrs. A. Robinson, D. Siddall and J. Robertson of GE Mostardi Platt. Mr. Tom Beach of NACME Steel Processing, L.L.C. provided assistance and coordinated plant operating conditions during the test program.

2.0 SUMMARY OF RESULTS

During this test program, three (3) HCl emission tests were performed at the HCl Scrubber Exhaust Stack. Complete test results are given on page 6. The following table summarizes the results.

Parameter	HCl Scrubber Exhaust Stack
HCl Concentration, ppm	6.87
HCl Emission Rate, lbs/hr	0.217

GE Mostardi Platt Project 20020303

1

O GE Mostardi Platt

3.0 DISCUSSION OF RESULTS

No problems were encountered with the testing equipment during the course of the test program. Source operation appeared normal during the entire test program. Operating data was recorded by plant personnel and is appended.

Calculations were performed for each test to determine if the gas stream was supersaturated. The results show that the gas stream was not supersaturated.

4.0 TEST PROCEDURES

All testing, sampling, analytical, and calibration procedures used for this test program were performed as described in the Title 40, Code of Federal Regulations, Part 60 (40CFR60), Appendix A, Methods 1-4 and 26A, and the latest revisions thereof. Where applicable, the Quality Assurance Handbook for Air Pollution Measurement Systems, Volume III, Stationary Source Specific Methods, United States Environmental Protection Agency (USEPA) 600/4-77-027b was used to determine the precise procedures.

4.1 Volumetric Flowrate Determination

In order to determine the emission rate on a lbs/hr basis, the stack gas velocity and volumetric flowrate were determined using Method 2, 40CFR60.

Velocity pressures were determined by traversing the test location with an S-type pitot tube. Temperatures were measured using a K-type thermocouple with a calibrated digital temperature indicator. The molecular weight and moisture content of the gases were determined to permit the calculation of the volumetric flowrate. Sampling points utilized were determined using Method 1, 40CFR60.

4.2 Oxygen (O2)/Carbon Dioxide (CO2) Determination

Oxygen (O₂) and carbon dioxide (CO₂) gas contents were determined in accordance with Method 3, 40CFR60. This method analyzed samples collected in a grab manner using a Hays Orsat gas analyzer. Several gas extractions were performed during each test run to ensure a stable reading. Mandatory leak checks were performed prior to and following each use. Chemicals are changed frequently and inspected for reactivity prior to each use.

2

4.3 Hydrogen Chloride (HCl) Determination (Isokinetic Sampling)

Hydrogen chloride (HCl) concentrations were determined using Method 26A, 40CFR60. An integrated twenty four point sample was extracted from the gas stream and passed through dilute (0.1 N) sulfuric acid. In the dilute acid, the HCl dissolved and formed chloride (CI) ions. The chloride ions were then analyzed by ion chromatography. The sample train consisted of a heated glass probe liner, a heated optional filter, and six impingers. The first impinger was short stemmed and empty to knock out heavy moisture, the second and third impingers contained the dilute sulfuric acid, the fourth and fifth impingers contained a 0.1 N sodium hydroxide (NaOH) scrubber solution to remove any remaining chlorine, and the sixth impinger contained silica gel to absorb any remaining moisture. The train was leak checked prior to and after each run. The sample was then extracted isokinetically. The samples were recovered by quantitatively transferring the contents of the first three impingers (the knock out and the two absorbing solution impingers) and deionized water rinses to a glass sample jar. The samples were mixed and labeled, and the level marked for transfer to the laboratory. The samples were then analyzed by ion chromatography. Copies of all sample analysis sheets are appended to this report.

Calculations were performed on computer and by hand. An explanation of the nomenclature and calculations along with the complete test results are appended. Also appended are the calibration data and copies of the raw field data sheets.

Raw data are kept on file at the GE Mostardi Platt office in Elmhurst, Illinois. All samples from this test program (not already used in analysis) will be retained for 60 days after the submittal of the report, after which they will be discarded unless GE Mostardi Platt is advised otherwise.

5.0 QUALITY ASSURANCE PROCEDURES

GE Mostardi Platt recognizes the previously described reference methods to be very technique oriented and attempts to minimize all factors which can increase error by implementing its Quality Assurance Program into every segment of its testing activities.

Shelf life of chemical reagents prepared at the GE Mostardi Platt laboratory or at the jobsite did not exceed those specified in the above mentioned methods; and, those reagents having a shelf life of one week were prepared daily at the jobsite. When on-site analyses were required, all reagent standardizations were performed daily by the same person performing the analysis.

Dry and wet test meters were calibrated according to methods described in the Quality Assurance Handbook, Sections 3.3.2, 3.4.2 and 3.5.2. Percent error for the wet test meter according to the methods was less than the allowable error of 1.0 percent. The dry test meters measured the test sample volumes to within 2 percent at the flowrate and conditions encountered during sampling.

6.0 TEST RESULTS SUMMARY

	TRESULIS S	UMMARY:		
Plant: NACIVIE Steel Processing	Source	HEL Scribb	er Exhaust	
Test Run Number	1	2	3	Average
Test Location		Stack	,	
Source Condition		Normal		
Date		4/16/02		
Time	0845-0955	1040-1147	1225-1330	2000年 - 1800年 1000年 - 1800年 1000年 - 1800年 1000年 - 1800年 1000年 - 1800年 1000年 1
HCl Concentration, ppm	7.05	7.37	6.20	6.87
HCl Emission Rate, lbs/hr	0.229	0.229	0.192	0.217
Average Gas Volumetric Flow Rate:				·
@ Flue Conditions, acfm	7,202	6,968	7,022	7,064
@ Standard Conditions, dscfm	5,704	5,466	5,450	5,540
Average Gas Temperature, °F	126.17	125.58	125.50	125.75
Average Gas Velocity, ft/sec	16.982	16.430	16.558	16.657
Flue Gas Moisture, percent by volume	10.4	11.3	12.3	11.3
Average Flue Pressure, in. Hg	29.35	29.35	29.35	
Barometric Pressure, in. Hg	29.31	29.31	29.31	
Average % CO ₂ by volume, dry basis	0.0	0.0	0.0	0.0
Average % O ₂ by volume, dry basis	20.5	20.9	20.9	20.8
Dry Molecular Wt. of Gas, lb/lb-mole	28.820	28.836	28.836	
Gas Sample Volume, dscf	37.633	36.645	36.653	

APPENDIX

OPERATING DATA DURIN EMPISIONS TEST 4-16-02

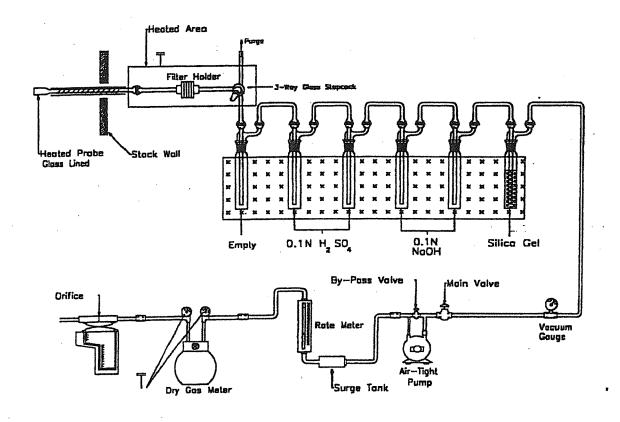
AAS	TEMP 41-1950 42 185° 43 195° 44 195°	11.5%	SCRULLY WASTER 2.57 GPM	STACL MSA MONITOR 7 PPM
9Am	#1 195° #2 185° #3 195° #4 115°	11.6%	2.67 GPM	12 PPM
1047	# 195° # 2 185° # 3 195°	11.6%	2.69 GPM	8 ffm
llam	4 195° 4 196° 4 196°	11.4%	2.58 G1M	qtIM
12:	02 #1 H5° #2 185° #3 165°	11.4	2.56 GP4	8 PP4
1:0.	# 1 195° # 1 195° # 1 195°	11.4	2.57 Cpn	1 SPM

Pickled 200 Fows

4/16/02

Determination of HCI and HF Concentrations in Stack Gases

USEPA Method 26 Sample Train



ice Both
Temperature
Sensor

Dwg - R

LABORATURY REPURT



TEI Analytical, Inc. 71 77 N. Austin Niles, IL 60714-4617 847-647-1345

PREPARED FOR:

PAGE 1 of 1

Frank Jarke GE Mostardi Platt 888 Industrial Dr. Elmhurst, IL 60126 Report #: 56031 Report Date: 4/29/2002 Sample Received: 4/17/02 13:33

20020303-01

TEI Number	Sample	HCI (M26A) mg	Date Performed
56031	001	11.4	4/26/2002
56032	002	11.6	4/26/2002
56033	003	9.76	4/26/2002
56034	004	<0.05	4/26/2002

Gayle E. O'Neill, Ph.D.

CALCULATIONS FOR HCI METHOD 26

$$M = \frac{(S-B)}{4.53592 \times 10^8}$$

Where: Total

M = Mass of HCl in sample, lbs

S = Concentration of sample, micrograms HCl

B = Blank concentration micrograms HCl

4.53592 × 108 = Micrograms per Pound

C = M/V m s t d

Where:

C = Concentration of HCl in flue gas lbs/dscf

M = Mass of HCl in Sample, Ibs.

Vmstd = Sample volume measured by dry gas meter, corrected to standard conditions

 $E = C \times dscfm \times 60 min/hr$

Where:

The second of th

E = Emission rate HCl in lbs/hr

C = Concentration of HCl in lbs/DSCF

dscfm = Volumetric flow rate of stack gas, dry standard cubic feet per minute.

13

Form 1013A

© GE Mostardi Platt

METHOD 26 TEST RESULTS

Date:

4/16/02

Project

Nacme

Location:

HCI Scrubber

Bource:

Stack

Condition:

Normal

Data Taken By:

A. Robinson

est Humber:	1	Time:	0845-0955			
ressure, Barometric(Hg*):	. 29.310	Carbon Dioxide Content(%):	0.00			
Pressure, Static(H ₂ O"):	C.50	Oxygen Content(%):				
ressure, Stack(Hg*):	. 29.347	Nitrogen Content(%):				
nitial Voluma (cu.ft.)	. 25.082	Cl ₂ (mg)	0.000			
inal Volume (cu.ft.)	. 63.68	HCI (mg)	11.40			
Reter Temperature (°F)	81.04	Water Vapor In Flue Gas (Bws):	0.070			
Reter Volume (dscf)	37.6324	Cl ₂ (ppm):	0.00			
lister Calibration (Y)	. 1.011	HCi (ррт):	7.05			
nitlai Wt. (grms or mis)	865.5	Cl _z (ibs/hr):	0.00			
inal WL (grms or mis)	757.9	HCl (lbs/hr):	0.229			
verage Delta Η (ΔΗ)	1.420					
Pry Standard Flow Rate (dscfm):	5704.0					
est Number:	2 .	Time:	1040-1147			
ressure, Barometric(Hg"):	. 29.310	Carbon Dioxide Content(%):	0.00			
ressure, Static(H ₂ O"):	0.50	Oxygen Content(%):				
ressure, Stack(Hg"):		Nitrogen Content(%):	79.10			
nitial Volume (cu.ft.)		Cl ₂ (mg)	0.DOD			
inal Volums (cu.ft.)		HCl (mg)				
leter Temperature (°F)		Water Vapor in Fiue Gas (Bws):				
leter Volume (dscf)	. 36.6410	Cl ₂ (ppm):	0.00			
leter Calibration (Y)		HCi (ppm):				
ritial Wt. (gims or mis)	650.8	Cl ₂ (fbs/hr):	0.000			
inal WL (grms or mls)	. 749.9	HCI (Ibs/hr):	0.229			
verage Delta H (AH)	1.360					
ry Standard Flow Rate (dscfm):	. 5486.0					
est Number:	3	Time:	1225-1330			
ressure, Barometric(Hg*):	29.310	Carbon Dioxide Content(%):	0.00			
ressure, Static(H ₂ O"):	0.50	Oxygen Content(%):	20.90			
ressure, Stack(Hg"):	29.347	Nitrogen Content(%):	79.10			
nitial Volume (cu.ft)	2.897	Ci ₂ (mg)	0.000			
inal Volume (cu.ft.)	41.257	HCI (mg)	9.760			
eter Temperature (°F)	89.17	Water Vapor in Flue Gas (Bws):	0.123			
ister Volume (decf)	38.6531	Cl ₂ (ppm):	0.00			
eter Calibration (Y)		HCI (ppm):				
ıltısı Wt. (grms or mis)		Cl ₂ (ibs/hr):				
inal Wt. (grms or mis)		HCI (Ibs/hr):				
verage Delta H (ΔH)	1.380					

PARTICULATE TRAVERSE DATA

Company: Nacme

Date:

4/16/02

Test Run.:

1 M26A

Location: HCI Scrubber Stack

	Vacuum in. Hg.	Meter Outlet °F	Meter Inlet °F	Stack Temp °F	ΔН	Volume cubic feet	Time	Sq. Root Δp	Δр	Point
				405	1.00	25.25		4		
1.748	4	77	77	125	1.60	25.08	8:45:00	0.300	0.09	1-1
1.840	4	77	. 77	124	1.80	26.83	8:47:50	0.316	0.10	1-2
1.710	4	77	79	125	1.60	28.67	8:50:00	0.300	0.09	1-3
1.630	4	77	79	125	1.40	30.38	8:52:50	0.283	0.08	1-4
1.620	4	78	80	125	1.40	32.01	8:55:00	0.283	0.08	1-5
1.620	4	78	80	125	1.40	33.63	8:57:50	0.283	0.08	1-6
1.510	4	78	81	127	1.30	35.25	9:00:00	0.265	0.07	1-7
1.550	4	79	82	128	1.30	36.76	9:02:50	0.265	0.07	1-8
1.520	4	79	82	127	1.30	38.31	9:05:00	0.265	0.07	1-9
1.540	4	79	. 82	125	1.30	39.83	9:07:50	0.265	0.07	1-10
1.420	4	79	82	125	1.10	41.37	9:10:00	0.245	0.06	1-11
1.437	4	79	82	125	1.10	42.79	9:12:50	0.245	0.06	1-12
0.000						44.23	9:15:00			
1.832	4	80	82	126	1.80	44.42	9:25:00	0.316	0.10	2-1
1.740	4	81	82	127	1.60	46.25	9:27:50	0.300	0.09	2-2
1.830	4	82	83	128	1.80	47.99	9:30:00	0.316	0.10	2-3
1.720	. 4	83	84	124	1.60	49.82	9:32:50	0.300	0.09	2-4
1.640	4	83	84	125	1.40	51.54	9:35:00	0.283	0.08	2-5
1.620	4	83	84	125	1.40	53.18	9:37:50	0.283	0.08	2-6
1.610	4	83	83	126	1.40	54.80	9:40:00	0.283	80.0	2-7
1.530	4	82	84	128	1.30	56.41	9:42:50	0.265	0.07	2-8
1.620	4	82	84	128	1.40	57.94	9:45:00	0.283	0.08	2-9
1.570	4	83	84	128	1.30	59.56	9:47:50	0.265	0.07	2-10
1.530	4	83	84	128	1.30	61.13	9:50:00	0.265	0.07	2-11
1.412	4	83	84	129	1.10	62.66	9:52:50	0.245	0.06	2-12
0.000						64.07	9:55:00			
0.000	-									
0.000										
0.000										
0.000										
0.000										
0.000								×		
0.000										
0.000										
0.000										
0.000										
0.000		-7		3						
0.000				Tanada.						
38.799		80	82	126	1.42	38.799		0.280		
			81.04							

METHOD 5 DATA ENTRY FORM Field Data/Calculated Data

Field Data/Calculated Data

Company:	Nacme					
Date:	4/16/02					
Test Run:	1 M26A					
Stack or Duct No.:	HCl Scrubber Stack					
Start Time:	8:45					
	D.EE					

Stop Time:	9:55	
Pb:	29.31	inches Hg
Static	0.50	inches H2O
Ps:	29.35	inches Hg Abs.
Vic:	92	mi + grams
Mn:	0.0000	gm
Test Time:	60	minutes
% O2:	20.50	%
% CO2:	0.00	%
% N2:	79.50	%
Delta H:	1.42	Inches H20
Cp:	0.836	Dimensionless - pitot
Tm:	81.04	of the second se
Sqrt P:	. 0.280	Inches H20
Ts:	128.17	°F .
Vm:	38.799	Cubic Feet
Dn:	0.372	inches - nozzie
As:	7.07	Sq. Feet
Yd:	1.011	Mcf
CF:	N/A	Process tons/hr
Heat Input:	N/A	MM BTU/hr
Fd:	N/A	dacf/10 ⁶ Btu
Fc:	NA	scf/10 ⁶ Btu

Vmstd:	37.633	cubic feet (dry)
Vwstd:	4.352	cubic feet (wet)
Bwo:	0.104	
Md:	28.820	lb/lb-mole (dry)
Ms:	27.698	lb/lb-mole (wet)
Excess Air (%)	4200.820	
Vs:	16,982	fpa
ACFM:	7202.	
DSCFM:	5704.	
WSCFM:	6363	
%l:	103.0	isokinetic variance
GR/ACF:	0.0000	
GR/DSCF:	0.0000	
lbs/hr	0.000	
lbs/ton prod.:	N/A	
libs/MM BTU:	N/A	Heat input
Ibs/MM BTU:	N/A	02 Basis
Ibs/MM BTU:	N/A	CO2 Basis

PARTICULATE TRAVERSE DATA

Company: Nacme

Date:

4/16/02

Test Run.:

2 M26A

Location: HCI Scrubber Stack

100	Vacuum	Meter	Heter	Stack		Volume		Sq. Root	: *44 y 4/4/880000990\$	S . F . W CELOGRAPH
	in. Hg	Outlet °F	Inlet °F	Temp °F	ΔH	cubic feet	Time	Δр		
					2007 1007 100000 1000			ΔÞ	Δp	Point
1.780	3	85	85	123	1.60	64.36	10:40:00	0.300	0.00	
1.720	3	85	85	123	1.60	66.14	10:42:50	0.300	0.09	1-1
1.870	3	85	85	122	1.80	67.86	10:45:00	0.316	0.09	1-2
1.830	3	85	86	123	1.80	69.73	10:47:50	0.316	0.10	1-3
1.750	3	85	87	124	1.60	71.56	10:50:00		0.10	1-4
1.690	3	85	87	125	1.50	73.31	10:52:50	0.300	0.09	1-5
1.680	3	85	87	125	1.50	75.00	10:55:00	0.283	0.08	1-6
1.650	3	85	88	126		76.68	10:57:50	0.283	0.08	1-7
1.550	3	86	88	127		78.33	11:00:00	0.283	0.08	1-8
1.530	3	86	88	128	1.30	79.88	11:00:50	0.265	0.07	1-9
1.470	3	86	88			81.41		0.285	0.07	1-10
1.432	3	86	88	129		82.88	11:05:00	0.245	0.06	1-11
0.000				120		84.31	11:07:50	0.245	0.06	1-12
1.550	2	85	85	125		84.55	11:10:00	100		
1.480	2	85	85	125			11:17:00	0.265	0.07	2-1
1.420	2	85	85			86.10	11:19:50	0.245	0.06	2-2
1.570	2	84	85			87.58	11:22:00	0.245	0.06	2-3
1.550	2	85	85	128		89.00	11:24:50	0.265	0.07	2-4
1.530	2	85	86	128		90.57	11:27:00	0.265	0.07	2-5
1.660	2	85	86			92.12	11:29:50	0.265	0.07	2-6
1.670	2	85	86			93.65	11:32:00	0.283	80.0	2-7
1.580	2	84	86			95.31	11:34:50	0.283	0.08	2-8
1.260	2	84	86			96.98	11:37:00	0.265	0.07	2-9
1.540	2	85	86			98.56	11:39:50	0.224	0.05	2-10
1.343	2	84	86			99.82	11:42:00	0.265	0.07	2-11
0.000		04	00	125		101.36	11:44:50	0.224	0.05	2-12
0.000						102.70	11:47:00			
0.000								A		
0.000										
0.000										
0.000	-									
0.000								1		
0.000										
0.000					(1)				-	
0.000										
0.000									-	
0.000										
0.000		A - 1						-		
38.105		85	86	126	1.36	38.105		0.270	-	
	V	/.	85.60			122 100 00		5.2.5	-	

METHOD 5 DATA ENTRY FORM

Field Data/Calculated Data

Company:	Nacme
Date:	4/16/02
Test Run:	2 M26A
Stack or Duct No.:	HCI Scrubber Stack
Start Time:	10:40

· 11.47	
29.31	Inches Hg
0.50	Inches H2O
29.36	inches Hg Abs.
89	mi + grams
0.0000	gm
60	minutes
20.90	%
0.00	%
79.10	%
1.36	Inches H20
0.836 -	Dimensionless - pitot
85.60	°F
0.270	inches H20
125.58	°F
38.105	Cubic Feet
0.372	Inches - nozzie
7.07	Sq. Feet
1.011	Mcf
N/A	Process tons/hr
N/A	MM BTU/hr
N/A	dscf/10 ⁶ Btu
N/A	scf/10 ⁶ Btu
	29.31 0.50 29.35 88 0.0000 60 20.90 0.00 79.10 1.36 0.836 85.60 0.270 126.58 38.105 0.372 7.07 1.011 N/A N/A N/A

Vmstd:	36.645	cubic feet (dry)
Vwstd:	4.668	cubic feet (wet)
Bwo:	0.113	
Md:	28.836	lb/lb-mole (dry)
Ms:	27.612	ib/ib-mole (wet)
Excess Air (%)	-118760.000	
Vs:	16.430	fps
ACFM:	6968.	
DSCFM:	5466.	
WSCFM:	6163	
%l:	104.7	isokinetic variance
GR/ACF:	0.0000	
GR/DSCF:	0.0000	
ibs/hr	0.000	
ibs/ton prod.:	N/A	
ibs/MM BTU:	N/A	Heat Input
ibs/MM BTU:	N/A	O2 Basis
Ibs/MM BTU:	N/A	CO2 Bàsis

PARTICULATE TRAVERSE DATA

Company: Nacme

Date:

4/16/02

Test Run.:

3 M26A

Location: HCl Scrubber Stack

		Sq. Raot		Volume	N. S. N. S. V.	Stack	Meter	Meter	Vacuum	
Point	Δρ	ΔÞ	Time	cubic feet	ØΑH ···	Temp °F	Inlet °F	Outlet °F	In Hg	
			7							
1-1	0.08	0.283	12:25:00	2.90	1.50	124	87	87	2	1.663
1-2	0.08	0.283	12:27:50	4.56	1.50		87	87	2	1.640
1-3	0.09	0.300	12:30:00	6.20	1.60		. 88	87	2	1.770
1-4	0.08	0.283	12:32:50	7.97	1.50		88		2	
1-5	0.08	0.283	12:35:00	9.65		124	88		2	
1-6	0.09	0.300	12:37:50	11.28	. 1.60	125	86	88	2	
1-7	0.08	0.283	12:40:00	13.07	1.50	122	89	88	2	1.630
1-8	0.07	0.265	12:42:50	14.70		122	89	88	2	1.560
1-9	0.07	0.265	12:45:00	16.26		123	89	88	2	1.570
1-10	0.07	0.265	12:47:50	17.83		124	89	88	2	1.540
1-11	0.07	0.265	12:50:00	19.37	1.30	125	89	88	. 2	1.570
1-12	0.06	0.245	12:52:50	20.94		126	89	88	2	1.459
			12:55:00	22.40	<u> </u>					0.000
2-1	0.08	0.283	13:00:00	22.40		126	88	88	2	1.641
2-2	0.09	0.300	13:02:50	24.04			90	88	2	1.760
2-3	0.10	0,316	13:05:00	25.80		128	. 90	88	2	1.880
2-4	0.09	0.300	13:07:50	27.68		128	91	89	2	1.760
2-5	0.08	0.283	13:10:00	29.44	1.50	128	91	89	2	1.680
2-6	80.0	0.283	13:12:50	31.12	1.50	128	91	89	2	1.660
2-7	0.07	0.265	13:15:00	32.78	1.30	127	92	90	2	1.530
2-8	0.06	0.245	13:17:50	34.31	1.10	126	93	90	2	1.460
2-9	0.06	0.245	13:20:00	35.77	1.10		93	90	2	1.420
2-10	0.06	0.245	13:22:50	37.19	1.10	128	93	90	. 2	1.430
2-11	0.05	0.224	13:25:00	38.62	0.91	128	93	90	2	1.320
2-12	0.05	0.224	13:27:50	39.94	0.91	125	93	90	2	1.317
			13:30:00	41.26						0.000
			<u> </u>					<u>. </u>		0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
				55.055		466				0.000
		0.272		38.360	1.38	126	90	88		38.360
							89.17	<u>.</u>		

METHOD 5 DATA ENTRY FORM

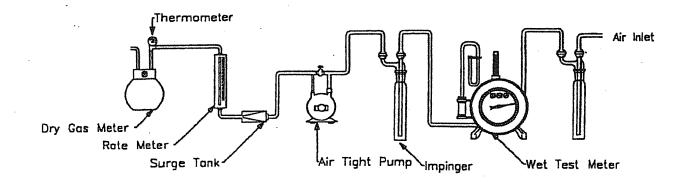
Field Data/Calculated Data

Company:	Nacme
Date:	4/16/02
Test Run:	3 M26A
Stack or Duct No.:	HCI Scrubber Stack
Start Time:	12:25
Stop Time:	13:30

	and property of the Company of the C	
Pb:	29.31	Inches Hg
Static	0.50	Inches H2O
Ps:	29.35	Inches Hg Abs.
Vic:	109	mi + grams
Mn:	- 0.0000	gm
Test Time:	6D	minutes
% O2:	20.90	%
% CO2:	0.00	%
% N2:	79.10	%
Delta H:	1.38	inches H20
Cp:	0.836	Dimensionless - pitot
Tm:	B9.17	°F
Sqrt P:	0.272	Inches H20
Ts:	125.50	°F
Vm:	38.360	Cubic Feet
Dn:	0.372	inches - nozzie
As:	7.07	Sq. Feet
Yd:	1.011	Mcf
CF:	N/A ·	Process tons/hr
Heat Input:	N/A	MM BTU/hr
Fd:	NA	dscf/10 ⁶ Btu
Fc:	N/A	scf/10 ⁶ Btu

Vmstd:	36.653	cubic feet (dry)
Vwstd:	5.120	cubic feet (wet)
Bwo:	0.123	
Md:	28.836	ib/ib-mole (dry)
Ms:	27.508	lb/lb-mole (wet)
Excess Air (%)	-118750.000	
Vs:	16.558	fps
ACFM:	7022.	
DSCFM:	5450.	
WSCFM: .	6211	
%l:	105.0	Isokinetic variance
GR/ACF:	0.0000	
GR/DSCF:	0.0000	
lbe/hr	0.000	
lbs/ton prod.:	N/A	
ibs/MM BTU:	N/A	Heat Input
ibs/MM BTU:	N/A	O2 Basis
lbs/MM BTU:	N/A	CO2 Basis

Gas Meter Calibration Train



Dwg - AF

STACK TEMPERATURE SENSOR CALIBRATION DATA FORM (FOR K-TYPE THERMOCOUPLES)

EPA Control Module Number:

E38

Name: TRJ

Ambient Temperature:

68 °F

Date: 04-10-02

Omega Engineering Calibrator Model No. CL23A Serial No. T-216363

Date Of Calibration Verification: 04-12-00

ary Standards Directly Traceable to

National Institute of Standards and Technology (NIST)

Reference' Source Temperature, (°F)	Test Thermometer Temperature, (°F)	Temperature Difference, ^b %
50	50	0.000
100	100	0.000
150	150	0.000
200	200	0.000
250	250	0.000
300	300	0.000
350	350	0.000
400	400	0.000
450	450	0.000
500	500	0.000
550	550	0.000
600	600	0.000
650	650	0.000
700	700	0.000
800	800	0.000
900	900	0.000
1000	1000	0.000
1100	1100	0.000
1200	1200	0.000

*Every

(50°F) for each reference point.

(Ref. Temp., °F + 460) - (Test Therm. Temp., °F + 460) * 100 <= 1.5 % Ref. Temp., °F + 460

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
Complainant,)	
v.)	PCB No. 13 - 12
NACME STEEL PROCESSING, LLC,)	(Enforcement – Air)
a Delaware limited liability corporation,)	
Respondent.)	

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 10
OCTOBER 18, 2005 RENEWAL
APPLICATION-FEDERALLY
ENFORCEABLE STATE OPERATING
PERMIT ("2005 FESOP APPLICATION")

October 18, 2005

Mr. Donald Sutton, P.E.

Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control
1021 North Grand Avenue East
Springfield, Illinois 62702

RE: FESOP Application

NACME Steel Processing ID No. 031600FWL

Dear Mr. Sutton:

Per our discussion with Mr. Valeriy Brodsky, enclosed please find three copies of the Federally Enforceable State Operating Permit (FESOP) application prepared by MOSTARDI PLATT ENVIRONMENTAL (MPE) for the NACME Steel Processing facility located at 429 West 127th Street in Chicago, Illinois (the facility).

Please note that this application is being submitted as part of the facility's permit renewal process for Operating Permit No. 96020074. The raw material throughputs and associated emissions data in this application are based upon air emission testing completed at the facility in April 2002 at a time in which the facility was restarting after an approximate two-month shutdown. Therefore, the emission testing was completed at a time in which only a limited throughput of steel, which was the maximum steel throughput available at the time of the test, was processed during the emission testing program.

As discussed with Mr. Valeriy Brodsky on September 30, 2005, additional emission testing will be completed by the end of 2005 at the facility to address the facility's ability to increase maximum production levels at the facility since restarting operations in March 2002 and address the steel throughput limitations as requested in the Illinois EPA construction permit application issued to the facility in April 2002 (Application No. 01040081). Upon completion of the testing program, NACME will be requesting increased production limitations as listed in the construction permit.

We appreciate your assistance in the matter. If you have any questions or comments, please contact Karyn Andersen at (630) 993-2680.

Regards,

NACME STEEL PROCESSING

Willam Reichel Production Manager

pc: J. DuBrock, National Materials

RENEWAL APPLICATION – FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

Prepared For NACME STEEL PROCESSING

On the Property Commonly Known As
429 West 127th Street
Chicago, Illinois

October 18, 2005

RENEWAL APPLICATION – FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

Prepared For
NACME STEEL PROCESSING
On the Property Commonly Known As
429 West 127th Street
Chicago, Illinois
October 18, 2005

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MOSTARDI PLATT PROJECT M046005 (2005)

TABLE OF CONTENTS

200-CAAPP	
Exhibit 200-1 Process Description	1-0
Exhibit 200-2 Site Location Map	
Exhibit 200-3 Facility Diagram	
Exhibit 200-4 List of Insignificant Activities	1-9
220-CAAPP	2-1
Exhibit 220-1 Coating Oil MSDS	
240-CAAPP	
Exhibit 240-1 Boiler 1 Emissions Calculations	
Exhibit 240-2 Boiler 2 Emissions Calculations	3-13
260-CAAPP	4-1
Exhibit 260-1 Pickling Process Flow Diagram	4-11
Exhibit 260-2 Pickle Line Emission Calculations	4-12
232-CAAPP	5-1
Exhibit 232-5 HCl AST Emission Calculations	5-11
215-CAAPP	6-1
391-CAAPP	
293-CAAPP	8-1
296-CAAPP	9-1



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL - PERMIT SECTION P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

	FOR	APPL	ICANT'S	USI
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Revision #:

Date: / /

Page of

FOR AGENCY USE ONLY

Source Designation:

APPLICATION FOR CAAPP PERMIT (CHECK ONLY ONE) INITIAL APPLICATION RENEWAL APPLICATION		ID NUMBER:		
		PERMIT #:		
SIGNIFICANT MODIFIC		DATE:		
	SOURCE IN	FORMATION		
1) SOURCE NAME:			2) DATE FORM COM	PLETED:
NACME Steel Processing			September 30, 2	2005
3) SOURCE STREET ADDRESS:				
429 West 127th Street				
4) CITY:			5) ZIP:	
Chicago			60628	
6) IS THE SOURCE LOCATED WITHI	N CITY LIMITS?		YES	NO
0)10 1112 0001100			Z 120	
7) TOWNSHIP NAME: 8) COUNTY: Cook		9) TYPICAL NO. OF EMPLOYER		EMPLOYEES
			AT THE SOURCE: 50	
10) ILLINOIS AIR POLLUTION SOUR	1 A	11) FEDERAL EN	PLOYER IDENTIFICAT	ION NO.
(IF KNOWN):	2012	(FEIN):		
031600FWL				
12) TYPE OF SOURCE AND PRODUC	CTS PRODUCED:			
Steel Pickling				
13) PRIMARY STANDARD INDUSTRI	AL CLASSIFICATION (SIC) CATEGORY:	14) PRIMARY SIC NO	O.:
41.66 15a) LATITUDE (DD:MM:SS):		b) LONGITUDE (DD:MM:SS):		
		87.63		
6a) UTM ZONE: b) UTM VERTICAL ((KM):	c) UTM HORIZONTAL (KM):	
17a) COORDINATE METHOD: b) REFERENCE LO		CATION:	c) COORDINATE A	CCURACY:
T/a/ GOGNOMATIE METTIES	STANDARD TO SERVICE			
18) SOURCE ENVIRONMENTAL COM	ITACT PERSON:	19) CONTACT P	ERSON'S TELEPHONE	NO.:
William Reichel		773-291-130	73	

ID NUMBER:

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMAN AND CHAPTER. APPROVED BY THE FORMS MANAGEMENT CENTER. FOR APPLICANT'S USE

APPLICATION PAGE 1-1

Printed on Recycled Paper 200-CAAPP

OWNER INFORMATION				
20) NAME:	UPPINE	RINFUR	RMATION	
National Material, L.P.				
21) ADDRESS:				
1965 Pratt Boulevard				
	OTATE.			- 17 T.D.
22) CITY:	23) STATE:			24) ZIP:
Elk Grove Village	Illinois			60007
25) OWNER'S AGENT (IF APPLICABLE)	F			
		•		
26) NAME:	OPERAT	OR INFO	ORMATION	
·				
NACME Steel Processing			***************************************	
27) ADDRESS:				
429 West 127 th Street				
28) CITY:	29) STATE:			30) ZIP:
Chicago	Illinois			60628
BILLING INFORMATION 31) NAME:				
31) NAME:		•		
NACME Steel Processing				
32) ADDRESS:				
429 West 127 th Street				
33) CITY:	34) STAT	E:		35) ZIP:
Chicago	Illinoi	is		60628
36) CONTACT PERSON:		37) CONTACT PERS	SON'S TELEPHONE NO.:
William Reichel			773-291-1303	
APPLICANT INFORMATION				
38) WHO IS THE PERMIT APPLICANT?			ORRESPONDENC CHECK ONE)	<u></u>
(CHECK ONE): OWN	IER	,	macre c,	OWNER
			•	SOURCE
<u></u>	RATOR			OPERATOR
40) ATTENTION NAME AND/OR TITLE F	OR WRITTEN C	ORRESPO	ONDENCE:	
William Reichel, Production Man	ager			
41) TECHNICAL CONTACT PERSON FO	R APPLICATION	N:	42) CONTACT P	PERSON'S TELEPHONE NO.:
Karvn Andersen			630-993-268	80

STATE !

SUMMARY OF APPLICATION CONTENTS		
OTE: ITEMS 43 TO 61 WILL BE USED FOR APPLICATION COMPLETENESS DETERMINATION.	Taraki I	
OTE: ITEMS 43 TO BT WILL BE OCCUPY A TABLE OF CONTENTS? 3) DOES THE APPLICATION INCLUDE A TABLE OF CONTENTS?	YES	NO
4) DOES THE APPLICATION INCLUDE A LIST OF ALL ITEMS AND ACTIVITIES FOR		
WHICH A PERMIT IS BEING SOCOTO	YES	NO
5) DOES THE APPLICATION INCLUDE A PLOT PLAN AND/OR MAP DEPICTING THE AREA WITHIN ONE-QUARTER MILE OF THE SOURCE?	YES	NO
DOES THE APPLICATION INCLUDE A PROCESS FLOW DIAGRAM(S) SHOWING ALL EMISSION UNITS AND CONTROL EQUIPMENT, AND THEIR RELATIONSHIP?	YES	Пио
47) DOES THE APPLICATION INCLUDE A COMPLETE PROCESS DESCRIPTION FOR THE SOURCE?	X YES	NO
48a) DOES THE APPLICATION INCLUDE THE APPROPRIATE, COMPLETED FORMS FOR ALL INDIVIDUAL EMISSION UNITS AND AIR POLLUTION CONTROL EQUIPMENT. LISTING ALL APPLICABLE REQUIREMENTS AND PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE REQUIREMENTS?	YES	NO
b) DOES THE APPLICATION ADDRESS OTHER MODES OF OPERATION FOR WHICH A PERMIT IS BEING SOUGHT?	NOTE: NOT AP	YES NO
c) DOES THE APPLICATION INCLUDE ALL REASONABLY ANTICIPATED OPERATING SCENARIOS FOR WHICH A PERMIT IS BEING SOUGHT?	NOTE: NOT AF	A Comment of
49) DOES THE APPLICATION INCLUDE A COMPLETED "FUGITIVE EMISSION" FORM 391- CAAPP?	X YES	Ои
50) DOES THE APPLICATION INCLUDE A COMPLETED "FEE DETERMINATION FOR CAAPP PERMIT" FORM 292-CAAPP? (NOTE: FEES WILL BE BASED UPON INFORMATION CONTAINED IN THIS FORM.)	YES	NO
51) DOES THE APPLICATION INCLUDE A COMPLETED "HAZARDOUS AIR POLLUTANT EMISSION SUMMARY" FORM 215-CAAPP?	YES	Пио
52) DOES THE APPLICATION INCLUDE THE CALCULATIONS ON WHICH THE FOLLOWING, TO THE EXTENT THEY ARE RELATED TO AIR EMISSIONS, WERE BASED: • POLLUTANT EMISSION RATES,	YES	Пио
FUELS AND RAW MATERIALS 05/05/1/19 CONTROL EQUIPMENT EFFICIENCY? COMPLETED "COMPLIANCE PLAN/SCHEDULE"		
OF COMPLIANCE TOTAL		NO
54) DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE CERTIFICATION" FORM 296-CAAPP?		_ NO
55) DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE PLANSCHEDULE OF COMPLIANCE-ADDENDUM FOR NONCOMPLYING EMISSION UNITS" FORM 294- CAAPP FOR ONE OR MORE NONCOMPLIANT EMISSION UNITS FOR WHICH ISSUANCE OF A CAAPP PERMIT IS REQUESTED?		YES N

...

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56)	HAS THE APPLICANT RETAINED A COPY OF THIS APPLICATION AT THE SOURCE? (NOTE: IF TRADE SECRET INFORMATION IS NOT BEING SUBMITTED, THEN ONLY THE ORIGINAL APPLICATION NEED BE INITIALLY SUBMITTED. HOWEVER, THE ILLINOIS EPA MAY REQUEST UP TO 4 COPIES OF THE FINAL APPLICATION PRIOR TO PUBLIC NOTICE.)	YES	NO
57a	DOES THE APPLICATION CONTAIN TRADE SECRET INFORMATION?	YES	NO
b) IF YES, HAS SUCH INFORMATION BEEN PROPERLY MARKED AND CLAIMED, AND TWO SEPARATE COPIES OF THE APPLICATION SUITABLE FOR PUBLIC INSPECTION BEEN SUBMITTED, IN ACCORDANCE WITH APPLICABLE REGULATIONS?	YES	Пио
58)	DOES THE APPLICATION INCLUDE AN EARLY REDUCTION DEMONSTRATION FOR HAZARDOUS AIR POLLUTANTS (HAP) PURSUANT TO SECTION 112(i)(5) OF THE CLEAN AIR ACT AS AMENDED IN 1990?	NOTE: NOT AP	YES NO
59)	DOES THE APPLICATION INCLUDE A PROPOSED DETERMINATION OF MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT) FOR HAZARDOUS AIR POLLUTANTS PURSUANT TO SECTION 112 OF THE CLEAN AIR ACT AS AMENDED IN 1990?	NOTE: NOT AP	YES NO
60)	HAS THE APPLICANT REGISTERED A RISK MANAGEMENT PROGRAM FOR ACCIDENTAL RELEASES PURSUANT TO SECTION 112(r) OF THE CLEAN AIR ACT AS AMENDED IN 1990 OR INTENDS TO COMPLY WITH THIS REQUIREMENT IN ACCORDANCE WITH ITS COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE?	*NOTE: NOT AF	YES NO
	FOR CAAPP PERMIT RENEWALS, DOES THE APPLICATION INCLUDE A COMPLIANCE ASSURANCE MONITORING PLAN (FORM 464-CAAPP) PURSUANT TO 40 CFR PART 64?	*NOTE: NOT AF	YES NO
b) FOR SIGNIFICANT MODIFICATIONS AND INITIAL CAAPP APPLICATION SUBMITTED AFTER APRIL 20, 1998, DOES THE APPLICATION INCLUDE A COMPLIANCE ASSURANCE MONITORING PLAN (FORM 464-CAAPP) PURSUANT TO 40 CFR PART 64 FOR THE EMISSION UNITS WITH POST-CONTROL EMISSIONS GREATER THAN OR EQUAL TO THE MAJOR SOURCE THRESHOLD?	NOTE: NOT AF	YES NO
62)	FOR SIGNIFICANT MODIFICATIONS, DOES THE APPLICATION INCLUDE A DESCRIPTION OF THE PROPOSED CHANGE(S), INCLUDING ALL PHYSICAL CHANGES IN EQUIPMENT, CHANGES IN THE METHOD OF OPERATION, CHANGES IN EMISSIONS, AND ANY NEW APPLICABLE REQUIREMENTS WHICH WILL APPLY AS A RESULT OF THE PROPOSED CHANGE?	YES	МО
NO.	TE: ANSWERING "NO" TO ANY OF THE ABOVE (ITEMS 43-62, EXCEPT I THE APPLICATION BEING DEEMED INCOMPLETE.	TEM 57a) N	IAY RESULT
63)	DOES THE APPLICATION REQUEST TO UTILIZE THE OPERATIONAL FLEXIBILITY PROVISIONS AND INCLUDE THE INFORMATION REQUIRED FOR SUCH USE?	YES	NO
64a)	DOES THE APPLICANT HEREBY REQUEST A PERMIT SHIELD FOR THE ENTIRE SOURCE?	YES	NO
b)	IF NO, DOES THE APPLICATION CONTAIN A REQUEST FOR A PERMIT SHIELD FOR SPECIFIC ITEMS ONLY, IN ACCORDANCE WITH THE INSTRUCTIONS FOR A CAAPP PERMIT?	YES	ON O
65)	DOES THE APPLICATION INCLUDE A COMPLETED "LISTING OF INSIGNIFICANT ACTIVITIES" FORM 297-CAAPP?	YES	ОМ
66)	DOES THE APPLICATION INCLUDE A DRAWING PROVIDING THE SOURCE LAYOUT? IF NO, PLEASE NOTE THAT THE AGENCY MAY REQUEST SUCH A DRAWING UPON DETAILED REVIEW OF THE APPLICATION.	YES	No

671 111	IV IS THE ARRIVANT ARRIVANCE FOR	A CAADE BERMIT (OUTON ALL THAT ASSET	(15)	
6/) W		A CAAPP PERMIT (CHECK ALL THAT APPL)		
	THE POTENTIAL TO EMIT ONE OR M GREATER.	MORE AIR POLLUTANTS FOR THE SOURCE	IS 100 TONS/YEA	AR OR
	THE SOURCE IS AN AFFECTED SOU	RCE FOR ACID RAIN DEPOSITION.		
	THE POTENTIAL TO EMIT VOM OR N OF THE FOLLOWING CHICAGO ARE	IOX IS 25 TONS/YEAR OR MORE AND THE S A COUNTIES OR TOWNSHIPS:	OURCE IS LOCA	TED IN ONE
	COOK COUNTY DUPAGE COUNTY KANE COUNTY LAKE COUNTY MCHENRY COUNTY	 WILL COUNTY AUX SABLE TOWNSHIP, GRUNDY COU GOOSE LAKE TOWNSHIP, GRUNDY CO OSWEGO TOWNSHIP, KENDALL COUN 	UNTY	
	OZONE PRECURSOR IN THE CHICAG SOURCE THRESHOLD FOR NOX EMIL EFFECTIVE, SHOULD THE CURRENT	D AN EXEMPTION ON NITROGEN OXIDES (I GO OZONE NON-ATTAINMENT AREA. THERI SSIONS IS 100 TONS/YEAR UNTIL THIS EXE NOX EXEMPTION BE NO LONGER EFFECT VILL BE 25 TONS/YEAR IN THE ABOVE CHIC	EFORE THE MAJ EMPTION IS NO L IVE, THE MAJOR	OR ONGER SOURCE
THE POTENTIAL TO EMIT AN INDIVIDUAL HAZARDOUS AIR POLLUTANT IS 10 TONS/YEAR OR MORE, OR THE POTENTIAL TO EMIT ALL SOURCE WIDE HAZARDOUS AIR POLLUTANTS IS 25 TONS/YEAR OR MORE, OR MEETS AN APPLICABLE LOWER THRESHOLD.				
\boxtimes		T OR OPERATIONS SUBJECT TO CERTAIN OR WHICH USEPA REQUIRES A CAAPP PE		N
	E ACTUAL EMISSIONS OF THE SOURC AAPP PERMIT?	E BELOW THE APPLICABILITY LEVELS FOR	YES	□ NO
SUC			XES	□ NO
OPE OR BEL	RATING PERMIT (FESOP) CONSTRAIN	T A FEDERALLY ENFORCEABLE STATE NING THE EMISSIONS AND PRODUCTION HAT POTENTIAL EMISSIONS WOULD FALL REBY EXCLUDE THE SOURCE FROM	YES	□ NC
		SIGNATURE BLOCK		
	IS CERTIFICATION MUST BE SIGNED BY A F	RESPONSIBLE OFFICIAL APPLICATIONS WITHOU	T A SIGNED CERTI	FICATION
9) I CEF	LL BE RETURNED AS INCOMPLETE. TIFY UNDER PENALTY OF LAW THAT, IRY, THE STATEMENTS AND INFORMA PLETE.	BASED ON INFORMATION AND BELIEF FO ATION CONTAINED IN THIS APPLICATION A	RMED AFTER RE RE TRUE, ACCU	EASONABLE RATE AND
AUTH	IORIZED SIGNATURE:			
BY:		Production	on Manager	
	AUTHORIZED SIGNATURE		SIGNATORY	
	William Reichel		1	
	TYPED OR PRINTED NAME OF SIGN	ATORY	DATE	

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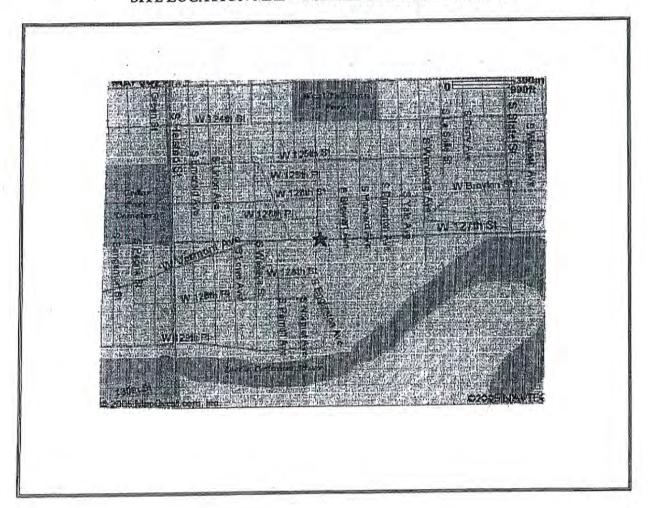
EXHIBIT 200-1 PROCESS DESCRIPTION

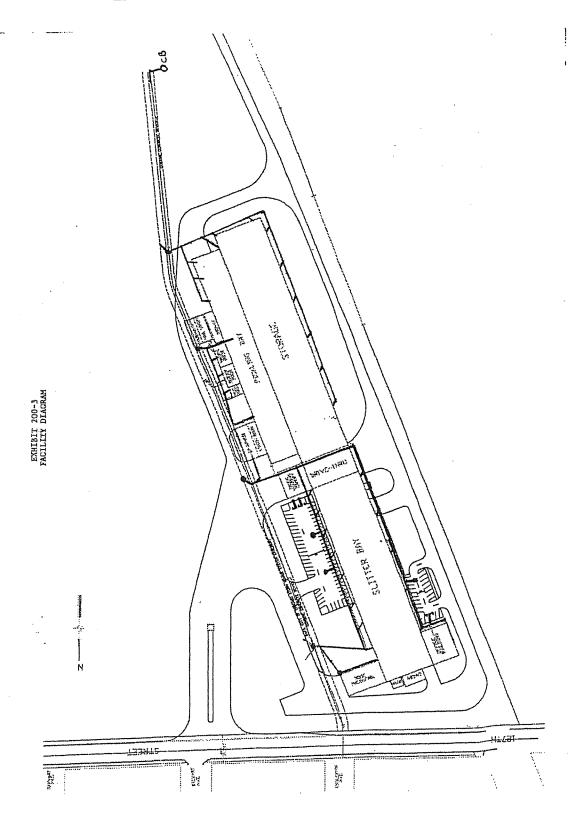
Operations at the NACME Steel Processing facility involve the steel pickling of steel coils to remove oxide scale. Steel coils are pickled in a hot hydrochloric acid (HCl) solution with an HCl concentration of 36%. Only one pickling line operates at the facility. Evaporative losses from the pickling tanks are ducted to a sieve tray scrubber before being emitted to the atmosphere. The coils are then rinsed, air dried, and sometime coated with by a non-VOM coating oil before being re-coiled and stored for distribution (Note: this rust preventative is not applied to all coils). A Copy of the MSDS for the coating oil is provided as Exhibit 220-1.

The pickling solution is heated by steam that is supplied by a natural gas-fired boiler. HCl solution is stored in two, 14,000-gallon above ground storage tanks (ASTs) and supply the HCl solution to the pickling line via hard piping. The HCl ASTs are closed vent tanks.

APPLICATION PAGE 1-6

EXHIBIT 200-2 SITE LOCATION MAP – NACME STEEL PROCESSING





APPLICATION PAGE 1-8

EXHIBIT 200-4 LIST OF INSIGNIFICANT ACTIVITIES

- Various Space Heaters 35 IAC 201.210(a)(4)
- 1,000-gallon Caustic Storage Tank (Wastewater Treatment Process) 35 IAC 201.210(a)(17)
- Roll Coater 35 IAC 201.210(a)(2)



1) SOURCE NAME:

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE		
Revision #:		
Date: / /		
Page of		
Source Designation:		

PROCESS EMISSION UNIT DATA AND INFORMATION

FOR AGENCY USE ONLY
ID NUMBER:
EMISSION POINT #:
DATE:

NACME Steel Processing				
2) DATE FORM	3) SOURCE ID NO.			
PREPARED:	(IF KNOWN):			
9/30/05	031600FWL			
GENERAL IN	<i>IFORMATION</i>			
4) NAME OF EMISSION UNIT:				
Steel Pickling Line				
5) NAME OF PROCESS:				
C41 Disloting				
Steel Pickling 6) DESCRIPTION OF PROCESS:				
Pickling of Steel Coils using a diluted HCl solution	OTHER ACCOMPLISHED:			
7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR A	CTIVITY ACCOMPLISHED.			
Pickled Steel with Non-VOM Rust Preventative Lub	pricant			
8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT:				
Stell Pickling Line				
9) MANUFACTURER OF EMISSION UNIT (IF KNOWN):				
10) MODEL NUMBER (IF KNOWN):	11) SERIAL NUMBER (IF KNOWN):			
10) MODEL NOMBER (IF ROOM).				
	a) CONSTRUCTION (MONTH/YEAR):			
12) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION	a) CONSTRUCTION (MOINT IN EASY).			
OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)				
Of This Living State (1.5)	b) OPERATION (MONTH/YEAR):			
	c) LATEST MODIFICATION (MONTH/YEAR):			
	C) LATEST WOODS TOATION (MOTOR LET 2 4 4)			
13) DESCRIPTION OF MODIFICATION (IF APPLICABLE):				

SOURCE INFORMATION

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE 2-1

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FOR APPLICANT'S USE

14) DOES THE EMISSION UNIT	HAVE M	ORE THAN ONE	MODE OF	PERATION		YES	No
IF YES, EXPLAIN AND IDEN A SEPARATE PROCESS EM FOR EACH MODE):	TIFY WH	IICH MODE IS C UNIT FORM 220	OVERED BY -CAAPP MU	THIS FORM ST BE COMP	(NOTE: LETED		
15) PROVIDE THE NAME AND DEMISSION UNIT, IF APPLICA		JOM SELL AAPP	ANU INC	PERCENIAI	_ 200-070-1	CONTRO	DLLING THIS UM FORM
MUST BE COMPLETED FOR	R EACH I	TEM OF AIR PO	LLUTION CO	NTROL EQU	IPMENT):		
Emission Scrubber							
16) WILL EMISSIONS DURING S RATE PURSUANT TO A SPE ESTABLISHED BY AN EXIST	CIFIC R	PROPOSED PE	RMIT COND	ITION?	WIII AG	YES	Мио
IF YES, COMPLETE AND AT EXCESS EMISSIONS DURIN	IG STAR	TUP OF EQUIP	MENT.				
17) PROVIDE ANY LIMITATIONS STANDARDS (E.G., ONLY C Line Speed	S ON SOU	URCE OPERATED	ION AFFECT AT A TIME):	ING EMISSIO	INS OR ANY V	VORK PR	ACTICE
		OPERATI	NO INFOR	MATION			
18) ATTACH THE CALCULATIO FOLLOWING OPERATING II BASED AND LABEL AS EXH		HE EXTENT TH	EY ARE AIR	EMISSION F			THE TA WERE
19a) MAXIMUM OPERATING HO			HOURS/DAY: DAYS/WEEK:		EK:	WEEK	S/YEAR:
7,488		24			-V:	52 WEEKS/YEAR:	
b) TYPICAL OPERATING HO	JRS	HOURS/DAY			=N.		
6,240		DEC-FEB(%	5 : MAR-MAY(%): J		JUN-AUG(%): 52	SEP-NOV(%):
20) ANNUAL THROUGHPUT		25		5	25		25
		MATERIAL U	SAGE INF	ORMATIC	N		
		MAXIMU	M RATES			TYPICAL	RATES
21a) RAW MATERIALS	_	LBS/HR	TONS/YEA		LBS/HR		TONS/YEAR
Steel Coils		77,990	292	000	77,990		292,000
HCl Solution		1,150	4,3	4,303			4,303
Water .		1,303	4,8	81	1,303		4,881
Coating Oil		1.2	4	5	1.2		4.5
			11.70			- 1	[]

	MAXIMU	M RATES	TYPICA	L RATES
21b) PRODUCTS	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
Unscaled Steel Coils	77,990	292,000	77,990	292,000
	·			
			TVDICA	AL RATES
		M RATES		TONS/YEAR
21c) BY-PRODUCT MATERIALS	LBS/HR	TONS/YEAR	LBS/HR	I UNS/TEAR
Scrap Steel	Various	Various	Various	Various
Spent Ferrous Chloride	Various	Various	Various	Various
Water	Various	Various	Various	Various
	·			
FUE	L USAGE DATA :	– Not Applicable (S	team Heat)	
22a) MAXIMUM FIRING RATE (MILLION BTU/HR):	b) TYPICAL F (MILLION E	IRING RATE	c) DESIGN CAPAC RATE (MILLION	CITY FIRING I BTU/HR):
(MILLION D. O. I. V.	,	-		
NATURAL GAS F	UEL OIL: GRADE NU	JMBER	COAL OTH	IER
IF MORE THAN ONE FUEL IS			EL AS EXHIBIT 220-2	
e) TYPICAL HEAT CONTENT OF		f) TYPICAL SULF	FUR CONTENT (WT %	
BTU/GAL OR BTU/SCF):		GAS):		
g) TYPICAL ASH CONTENT (W	Γ%., NA FOR NATUR	AL h) ANNUAL FUE	EL USAGE (SPECIFY I	UNITS, E.G., ():
GAS):	,			
23) ARE COMBUSTION EMISSION	NS DUCTED TO THE	SAME STACK OR CONT	TROL AS	YES NO
PROCESS UNIT EMISSIONS? IF NO, IDENTIFY THE EXHAU)		L	YES NO
			-	
			-	

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A PROVIDE ANY SPECIFIC EMISSION STANDARDIS) AND LIMITA	S) AND I IMITATION(S) SET BY BILL EVS) WHICH ARE AR	TIONIS) SET BY BILL ERS WHICH ARE ARDI ICABLE TO THIS EMISSION LINE (S. VOM. IAC 248 20411VI) 3 ELBSICAL).
REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
нсі	40 CFR 63, Subpart CCC	No HCI in a concentration in excess of 18 ppmv or mass emission rate that corresponds to a collection efficiency of less than 97
OVIDE ANY SPECIFIC RECORDIKEEPING RUI REGULATED AIR POLLUTANT(S)	25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT: REGULATED AIR POLLUTANT(S)	T: REQUIREMENT(S)
HCI	35 IAC 201.301	Compliance Records
HCI	40 CFR 63. 1160	Operations and Maintenance Plan/Inspection Records
нсі	40 CFR 63.10	Relevant Records
OVIDE ANY SPECIFIC REPORTING RULE(S) REGULATED AIR POLLUTANT(S)	26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT: REGULATED AIR POLLUTANT(S)	REQUIREMENT(S)
нсі	35 IAC 201.302	Annual Reporting/Compliance Notification
нсі	40 CFR 63.89(e)(3)	Testing Notification and Methods
27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE / REGULATED AIR POLLUTANT(S)) WHICH ARE APPLICABLE TO THIS EMISSION UNIT: MONITORING RULE(S)	REQUIREMENT(S)
HCI	201.281	Emission Source/Device Monitoring
HCI	40 CFR 63.1160	Pressure Drop Across Scrubber (Once Per Shift)
нсі	40 CFR 63.1162	Scrubber Water Flow
28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDL REGULATED AIR POLLUTANT(S))/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT: TESTING RULE(S)	EMISSION UNIT: REQUIREMENT(S)
HCI	35 IAC 201,282/40 CFR 63,1161 and 1162	Emission Testing, As Required
1011	40 CFR 63.7 and 63.8(e)(4)	Emission Testing to Establish Compliance with Relevant Limit

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APPLICATION PAGE 2-4
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			K 7
OTHERWISE APPLICABLE			YES NO
EXEMPTION, PROVIDE A		S EXEMPT AND THE RULE WHICH STIFYING THE EXEMPTION. INCL ND LABEL AS EXHIBIT 220-3, OR R EXEMPTION.	UDL DL MILLO
		INFORMATION	
REQUIREMENTS?	N COMPLIANCE WITH ALL APP	٤	YES NO
IF NO, THEN FORM 294-C COMPLYING EMISSION L	AAPP "COMPLIANCE PLAN/S INITS" MUST BE COMPLETED	CHEDULE OF COMPLIANCE – ADI AND SUBMITTED WITH THIS APP	ENDUM FOR NON LICATION.
31) EXPLANATION OF HOW I	NITIAL COMPLIANCE IS TO B	E, OR WAS PREVIOUSLY, DEMON	STRATED:
		3.1161 and maintenance of Co	
Emission Testing - Col	TUOI DEVICE Exhaust per o	a. 1707 and manners	
	•		
	•		
32) EXPLANATION OF HOW	ONGOING COMPLIANCE WILL	L BE DEMONSTRATED:	
			t emission
Maintenance of scrubb	per water/air flow, acid bath maintenance records, and	n temperature, steel throughpu	t, emission
source/control device	maintenairce records, and	coaming on meson	
·			
TEST	ING. MONITORING, REC	CORDKEEPING AND REPOR	?TING
	STATE OF LATE TO AID EMIC	SIONS FOR WHICH RECORDS AR	F BEING MAINTAINED TO I
		LIANCE. INCLUDE THE UNIT OF M Y OF SUCH RECORDS (E.G., HOUI	
METHOD OF MEASURE	MENI, AND THE FREQUENC	, 0. 300203	
	LINET OF MEACHDEMENT	METHOD OF MEASUREMENT	FREQUENCY
PARAMETER	UNIT OF MEASUREMENT		Monitored
Scrubber Water	Gallons	Flow meter	Continuous/
Flow			Recorded Once
		,	Per Shift
Steel Throughput	Tons '	Throughput Logs	Monthly
Acid Bath Temp	Degrees	Temperature Monitor	Continuous
	· · · · · · · · · · · · · · · · · · ·		

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PER	
Scrubber Water Flow	Flow Log	Shift Operator	Production Manage	
Steel Throughput	Throughput Log	Production Manager	Production Manage	17.70
Acid Bath Temp	Temperature Log	Pickle Line Operator	Production Manage	
IS COMPLIANCE OF THE THE RECORDS? IF NO, EXPLAIN:	EMISSION UNIT READILY DI	EMONSTRATED BY REVIEW OF	YES	NO
ARE ALL RECORDS REASUBMITTAL TO THE AGE IF NO, EXPLAIN:	DILY AVAILABLE FOR INSPE ENCY UPON REQUEST?	ECTION, COPYING AND	YES	NO
o) DESCRIBE ANY MONIT COMPLIANCE: Scrubber water flow	ORS OR MONITORING ACTIV	VITIES USED TO DETERMINE FEE	S, RULE APPLICA	BILITY OR
		E.G., VOM EMISSIONS TO ATMOS	SPHERE)?	
Flow of water to scrub				

4d) IS EACH MONITOR EQUIPPED WITH	A RECORDING DEVICE?		YES NO
IF NO, LIST ALL MONITORS WITHOUT	A RECORDING DEVICE:		
Scrubber flow meter			
GC/BBBC No.			
e) IS EACH MONITOR REVIEWED FOR AC BASIS?	CCURACY ON AT LEAST A Q	UARTERLY	YES NO
IF NO, EXPLAIN:			
Calibrated in accordance with man	ufacturer's specifications	5	
Camprated in accordance			
f) IS EACH MONITOR OPERATED AT AL	L TIMES THE ASSOCIATED	EMISSION UNIT IS	YES NO
IN OPERATION?			
IF NO, EXPLAIN:			
	TECTS IS ANY	IN WHICH THE RESI	JLTS ARE USED FOR
35) PROVIDE INFORMATION ON THE MC PURPOSES OF THE DETERMINATIO DATE, TEST METHOD USED, TESTIN	N OF FEES, RULE APPLICA	BILITY OR COMPLIAN	CE. INCLUDE THE TEST IG DURING THE TEST AND A
PURPOSES OF THE DETERMINATION DATE, TEST METHOD USED, TESTIN SUMMARY OF RESULTS. IF ADDITION	ONAL SPACE IS NEEDED, A	TTACH AND LABEL AS	S EXHIBIT 220-4:
	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
TEST DATE TEST METHOD	GE Mostardi Platt	Typical	0.217 lbs HCl/hr (6.87 ppm)
April Methods 2002 104 and 26A		Conditions	(6.6. pp)
		TITLE AND EDEOL	IFNCY OF REPORT
36) DESCRIBE ALL REPORTING REQUI	REMENTS AND PROVIDE T	HE IIILE AND FREQU	Hand to Super I was a second of the second o
SUBMITTALS TO THE AGENCY	TITLE OF REPOR		FREQUENCY
		Penort	Annually
REPORTING REQUIREMENTS	Annual Emission	LEPO.1	
Annual Emission Reporting			As Required
	Annual Emission Test Notification/P		As Required

Trans.

MACHINELY MACH					(31/10	MISSION	(37) EMISSION INFORMATION				
Martin M			1 ACTUAL EN	ISSION RATE			ALLOWABLE BY	RULE EMISSI	ON RATE	PERMITTED EMIS	SION RATE
LIBS PER TONS PER TENAS	-	VUNCONTRO	LLED EMISSIO	N RATE							
() () () () () () () () () ()		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	³ OTHER TERMS	³ OTHER TERMS	4DM		APPLICABLE RULES	TONS PER YEAR (TONS/YR)	100	TONS PER YEAR (TONS/YR)
() () () () () () () () () ()	AXIMUME						()				
() () () () () () () () () ()	TYPICAL:						()				
() () () () () () () () () ()	MAXIMUM:						()				
() () () () () () () () () ()	TYPICAL:						()				
() () () () () () () () () ()	MAXIMUM:						()				
() () () () () () () () () ()	TYPICAL:						()				
t	AXIMUM						()				
() () () () () () () () () ()	YPICAL:						()				
t 4.34 19 5 () () () () () () () () () (MAXIMUM:						()				
4.34 19 5 () () () () () () () () () (TYPICAL:						()				
4.34 19 5 () () 0.0065 lbs HCl/Ton Steel () 5 () 63.1157	MAXIMUM:						()				
4.34 19 5 () () 0.0065 lbs HCl/Ton Steel () 5 () 63.1157	TYPICAL:						()				
t 4,34 19 5 18 (ppm) 40 CFR 10 0.0055 lbs HCl/Ton Steel () () ()	MAXIMUME						()				
4.34 19 5 18 (ppm) 40 CFR 10 0.0065 lbs HCl/Ton Steel 63.1157 ()	TYPICAL:			1			()				
4.34 19	MAXIMUM:	4.34	19			2	18 (ppm)	40 CFR 63.1157	10	0.0065 lbs HCl/Ton Steel	0.951 tpy
	TYPICAL:	4.34	19			25	0				
	TYPICAL	4.00	14.4	- 0.24 CDMSCE		4	5.5 (LBS/J/R)	212.321	19.80		

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IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-5.

1 CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.
2 PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GRUDSCF, ETC.)
4 DM. DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP 42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP 42 OR AIRS)
5 RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

APPLICATION PAGE 2-8

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	ALLOWABLE BY RULE	⁵ RATE OR STANDARD APPLICABLE	18 ppmv 40 CFR	03.1137															98% by wt control device CFR 61 (GFR 61) (eak-tight frucks
MATION		4DM							<u> </u>								<u> </u>		2
(38) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION	TE SION RATE	30THER 4																	222
IIR POLLUTAN	☐ ¹ ACTUAL EMISSION RATE 区 ¹ UNCONTROLLED EMISSION RATE	TONS PER YEAR (TONS/YR)	19																0.8
) HAZARDOUS /	1ACTU/ □ 1UNCOI	POUNDS PER HOUR (LBS/HR)	4.34																9.0
(38			MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL	MAXIMUM;	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL	MAXIMUM:	TYPICAL:	MAXIMUM: TRE
	ATION	² CAS NUMBER	7467-01-0			-												-	71432
	HAP INFORMATION	NAME OF HAP EMITTED	нсі			·													EXAMPLE: Benzene

T. Salar

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- The Party III

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IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-2.

PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.

²CAS - CHEMICAL ABSTRACT SERVICE NUMBER. ³PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GROSCF, ETC.).

⁴DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).

⁵RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

APPLICATION PAGE 2-9
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	EXHAUST POIN	IT INFORMAT	ION
THIS SECTION SHOULD NOT BE COMP	PLETED IF EMISSIONS ARE E	XHAUSTED THROU	IGH AIR POLLUTION CONTROL EQUIPMENT.
39) FLOW DIAGRAM DESIGNATIO			
N/A – Exhausts through a s	crubber	OF MONITOR IN	DOORS ETC.) IF THE EXHAUST POINT
DISCHARGES INDOORS, DO	NOT COMPLETE THE ISE.		DOORS, ETC.). IF THE EXHAUST POINT
41) DISTANCE TO NEAREST PLAN	NT BOUNDARY FROM EX	HAUST POINT D	SCHARGE (FT):
42) DISCHARGE HEIGHT ABOVE	GRADE (FT):		
	The second second	Me de la companya della companya della companya de la companya della companya del	
43) GOOD ENGINEERING PRACT	ICE (GEP) HEIGHT, IF KN	OWN (FT):	
	LIGHT FOR A N	ON CIRCUI AR F	XHAUST POINT, THE DIAMETER IS
44) DIAMETER OF EXHAUST POIL 1.128 TIMES THE SQUARE RO	NT (FT): NOTE: FOR A N OOT OF THE AREA.	ON CIRCOLAR L	
45) EXIT GAS FLOW RATE	a) MAXIMUM (AC	:FM):	b) TYPICAL (ACFM):
46) EXIT GAS TEMPERATURE	a) MAXIMUM (°F)	:	b) TYPICAL (°F):
47) DIRECTION OF EXHAUST (VE	ERTICAL, LATERAL, DOW	NWARD):	
			EXHAUST POINT:
			EXHAUST POINT: FLOW DIAGRAM DESIGNATION
48) LIST ALL EMISSION UNITS AI NAME			EXHAUST POINT: FLOW DIAGRAM DESIGNATION
48) LIST ALL EMISSION UNITS AI NAME a)			EXHAUST POINT: FLOW DIAGRAM DESIGNATION
48) LIST ALL EMISSION UNITS AI NAME a)			EXHAUST POINT: FLOW DIAGRAM DESIGNATION
48) LIST ALL EMISSION UNITS AI NAME a) b)			EXHAUST POINT: FLOW DIAGRAM DESIGNATION
48) LIST ALL EMISSION UNITS AI NAME a) b) c) d)	ND CONTROL DEVICES S	SERVED BY THIS	EXHAUST POINT: FLOW DIAGRAM DESIGNATION
48) LIST ALL EMISSION UNITS AI NAME a) b) c) d) rhe following information nee	ND CONTROL DEVICES S	SERVED BY THIS	FLOW DIAGRAM DESIGNATION
48) LIST ALL EMISSION UNITS A	ND CONTROL DEVICES S	SERVED BY THIS	FLOW DIAGRAM DESIGNATION

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EXHIBIT 220-1 COATING OIL MSDS

APPLICATION PAGE 2-11

782-40 CORFILM 333

CORAL CHEMICAL COMPANY

Corporate Headquarters 135 LeBaron Street Waukegan, IL 60085 (800) 228-4646 or (847) 336-8100 8 A.M. To 5 P.M., CST

Revision Date: November 20, 2000

MATERIAL SAFETY DATA SHEET

		11, 19	0 = Insignificant
HMIS	HEALTH		1 = Slight
RATING	FLAMMABILITY		2 = Moderate
77.77	REACTIVITY	0	3 = High
	PERSONAL PROTECTION	C	4 = Extreme

INFOTRAC 24 HOUR EMERGENCY TELEPHONE (800) 535-5053 or (352) 323-3500

PRODUCT INFORMATION SECTION I:

TRADE NAME:

CORFILM 333

CHEMICAL NAME:

SYNONYMS:

THE PARTY

CHEMICAL FAMILY:

Rust preventive

The state of the s	SECTION II:	HAZARDOUS INGREDIENTS
--	-------------	-----------------------

HAZARD COMPONENTS:	CAS#	HAZARD DATA
	C/10 11	DAZARU DATA

Barium sulfonate* <1.3%

61790-48-5

10 mg (Ba)/M3 ACGIH TLV

15 mg (Ba)/M3 OSHA PEL

(Total Dust)

10 mg (Ba)/M3 OSHA PEL

(Respirable Fraction)

Solvent refined light

64741-89-5 and/or

5 mg/M3 ACGIH LLV

Paraffinic distillate

64741-97-5

5 mg/M3 OSHA PEL

Hydrotreated light

64742-55-9 and/or

Paraffinic or napthenic distillate

64742-53-6

*Chemical reported under Sect.

313, SARA Title III

Page 1 of 5

782-40 CORFILM 333

SECTION III: FIRST AID PRECAUTIONARY INFORMATION

ALWAYS HAVE PLENTY OF WATER AVAILABLE FOR FIRST AID

SKIN:

Immediately flush skin with plenty of water for at least 15 minutes. I

Wash with soap and water.

EYES:

雌雌

Immediately flush with plenty of water for at least 15 minutes;

ensure water flushing of entire surface of eye and lid. Obtain

medical attention at once.

INHALATION:

Remove to fresh air.

INGESTION:

If more than a half cup of material is swallowed, give several

glasses of water to drink, then induce vomiting. *Obtain medical* attention. Never give anything by mouth to an unconscious person.

NOTE: IARC has not found severely hydro treated oils to be

carcinogenic.

Remove contaminated clothing promptly. Launder clothing before

re-use; discard shoes.

SECTION IV: OVEREXPOSURE EFFECTS

SKIN:

May cause irritation.

EYES:

May cause irritation.

INHALATION:

Vaporization is not expected at ambient temperature. Breathing

mist will cause coughing, irritation of nose and throat.

INGESTION:

May cause initation.

SECTION V: PERSONAL PROTECTION

RESPIRATORY PROTECTION:

NIOSH-approved respirator for mists.

VENTILATION:

Mechanical (general or local exhaust)

PROTECTIVE GLOVES:

Impervious

Page 2 of 5

782-40 CORFILM 333

EYE PROTECTION:

Chemical goggles or face shield. Do not wear

contact lenses.

PROTECTIVE EQUIPMENT:

Apron or protective clothing.

HANDLING AND STORAGE:

Keep container tightly closed. Store in cool, dry

location. Keep from freezing.

PHYSICAL DATA AND CHEMICAL PROPERTIES SECTION VI:

BOILING POINT (°F):

>459°F

FREEZING POINT (°F):

N/A

VOLATILITY/VOL (%):

Negligible

VAPOR PRESSURE (mm Hg):

0.1 at 70° F

VAPOR DENSITY (Air =1):

SOLUBILITY IN H2O:

>10

Negligible

APPEARANCE/ODOR:

Clear, amber liquid; mild petroleum odor

SPECIFIC GRAVITY (H20 =1):

0.902

EVAPORATION RATE:

Negligible N/A

pH:

FIRE AND EXPLOSION HAZARD DATA

FLASH POINT:

SECTION VII:

>300° F (C.O.C.)

LOWER FLAME LIMIT:

NA

HIGHER FLAME LIMIT:

N/A

EXTINGUISHING MEDIA:

Dry chemical, carbon dioxide, foam, water fog; foam and

water spray are effective, but may cause frothing.

FOR FIRE:

Wear self-contained breathing apparatus with full face piece, operated in pressure demand or other positive pressure mode to protect against the hazardous effects of combustion products and oxygen deficiencies. Use water spray to cool fire-exposed containers to prevent rupture. Avoid spreading burning liquid with water used

for cooling.

. 50 0

UNUSUAL FIRE HAZARD:

Burning liquid will float on water. Notify appropriate authorities if liquid enters sewers/waterways.

SECTION VIII: REACTIVITY DATA

CHEMICAL STABILITY:

Stable

CONDITIONS TO AVOID:

Storage temperature above 200° F

INCOMPATIBLE MATERIALS:

Strong alkalis, strong oxidizing agents, strong

acids, sources of ignition.

DECOMPOSITION PRODUCTS:

Carbon dioxide, carbon monoxide, oxides of

sulfur and nitrogen and barium.

HAZARDOUS POLYMERIZATION:

Will not occur.

SECTION IX: SPILL AND DISPOSAL PROCEDURE

SPILL:

Use appropriate protective equipment. Dike to contain spill, cover with inert absorbent material, sweep up and place in a suitable container. Flush area well with water. Keep spills and cleaning run-off out of municipal sewers and open bodies of water.

WASTE DISPOSAL:

Material collected on absorbent and the absorbent are assumed to be contaminated. As such, they must be disposed to a permitted hazardous waste management facility in accordance with the Clean Air and Clean Water Acts, Resources Conservation and Recovery Act, and all relevant laws or regulations regarding disposal.

RCRA: It is the responsibility of the user to determine at time of disposal whether a product or solution meets RCRA criteria for hazardous waste, as mixing, use, contamination or soils may render the resultant mixture hazardous.

. 50.

TRANSPORTATION INFORMATION SECTION X:

HAZARD CLASS:

Not regulated

DOT SHIPPING NAME:

N/A

REPORTABLE QUANTITY (RQ):

UN NUMBER:

N/A

NA NUMBER:

N/A N/A

SECTION XI: TSCA INFORMATION

The chemical ingredients in this product are on the 8(b) TSCA Inventory Lists (40 CFR 710).

To the best of our knowledge, this information is true and accurate as of the date of this Material Safety Data Sheet. However, since the use of this information and the conditions of the use of the product are not under the control of Coral Chemical Company, it is the user's obligation to determine the conditions of safe use of the product.

Prepared by: J. D. Pemberton

Quality Assurance Manager

Page 5 of 5



7.4

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

FOR AP	PLIC	ANT	S USE					
Revision #:								
Date:	_ / _		/					
Page	*******	of						
Source Designation:								

	· · · · · · · · · · · · · · · · · · ·					
	FOR AGENCY USE ONLY					
	ID NUMBER:					
FUEL COMBUSTION EMISSION UNIT						
DATA AND INFORMATION	EMISSION POINT #:					
	DATE:					
COLUMN TO THE PARTY OF THE PART	I CONTRACTOR					
1) SOURCE NAME:	IFORMATION					
TO SOURCE NAME.						
2) DATE FORM	3) SOURCE ID NO.					
PREPARED:	(IF KNOWN):					
4) NAME OF EMISSION UNIT:	NFORMATION					
Boilers 1 and 2 (Boiler 2 for Steam Heat) 5) NAME OF PROCESS:						
b) NAIVIE OF PROCESS:						
Boiler						
6) DESCRIPTION OF PROCESS:	\$4.58 \$4 1					
For Comfort and steam heat						
7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR A	CTIVITY ACCOMPLISHED:					
Heat and steam						
8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT:						
Boilers 1 and 2						
9) MANUFACTURER OF EMISSION UNIT (IF KNOWN):						
10) MODEL NUMBER (IF KNOWN):	11) SERIAL NUMBER (IF KNOWN):					
12) DATES OF COMMENCING CONSTRUCTION,	a) CONSTRUCTION (MONTH/YEAR):					
OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)						
•	b) OPERATION (MONTH/YEAR):					
	c) LATEST MODIFICATION (MONTH/YEAR):					
13) DESCRIPTION OF MODIFICATION (IF APPLICABLE):						
N/A						

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE 3-1

Printed on Recycled Paper 240-CAAPP FOR APPLICANT'S USE

6,7000,000 Btu/hr (Each Unit) b) IS MORE THAN ONE FUEL FIRED A	AT A TIME?			YES	NO	
6,7000,000 Btu/hr (Each Unit) b) IS MORE THAN ONE FUEL FIRED A	AT A TIME?			YES	NO	
6,7000,000 Btu/hr (Each Unit)	T L TILIFO				N ZI	
ರ್ಷಕ್ರಿಸಿ ಕೃತಿ ಕಾರ್ವದ ಕ್ರಾಪ್ರಾಪ್ ಕ್ರಾಪ್ ಕ್ರವ್ ಕ್ರಾಪ್ ಕ್ರಾಪ್ ಕ್ರವ್ ಕ್						
21a) RATED OR DESIGN HEAT INPUT C						
	FIRING RATE	INFORMATION				
Д.	25	25	25		25	
20) ANNUAL THROUGHPUT	DEC-FEB(%):	MAR-MAY(%):	JUN-AUG(%):	SEP-NOV(%):	
7,488	24	6		52		
b) TYPICAL OPERATING HOURS	HOURS/DAY:	DAYSWEE	K:	WEEKS/YEAR:		
8,760	24	7		52		
BASED AND LABEL AS EXHIBIT 240 19a) MAXIMUM OPERATING HOURS	-1. REFER TO SPE HOURS/DAY:	CIAL NOTES OF FOR	M 202-CAAPF		S/YEAR:	
18) ATTACH THE CALCULATIONS, TO T FOLLOWING OPERATING INFORMA	HE EXTENT THEY	ARE AIR EMISSION R	ELATED, FRO	M WHICH	THE TA WERE	
		INFORMATION				
Firing Rate	, io oi aunito Al	55 (***********************************				
17) PROVIDE ANY LIMITATIONS ON SO STANDARDS (E.G., ONLY ONE UNIT	URCE OPERATION	AFFECTING EMISSIO	ONS OR ANY	WORK PF	RACTICE	
IF YES, COMPLETE AND ATTACH F EXCESS EMISSIONS DURING STAR	ORM 203-CAAPP, "F TUP OF EQUIPMEN	REQUEST TO OPERA	TE WITH			
RATE PURSUANT TO A SPECIFIC R ESTABLISHED BY AN EXISTING OR	ULE, OR THE ALLO	WABLE EMISSION LI	MIT AS	YES	i \sum_nc	
16) WILL EMISSIONS DURING STARTU	PEXCEED EITHER	THE ALLOWARIE EM	IISSION			
N/A	*					
MUST BE COMPLETED FOR EACH	ITEM OF AIR POLLU	JTION CONTROL EQU	IPMENT):	ADDE: 10		
15) PROVIDE THE NAME AND DESIGNA EMISSION UNIT, IF APPLICABLE (FO	ATION OF ALL AIR F	POLLUTION CONTROL	EQUIPMENT	CONTRO	OLLING THIS	
A SEPARATE PROCESS EMISSION FOR EACH MODE):	UNIT FORM 240-CA	APP MUST BE COMP	PLETED			
	HICH MODE IS COV	ODE OF OPERATION ERED BY THIS FORM	(NOTE:	YES	∠ Juc	

THE PERSON

21c) IF HEAT INPUT CAPACITY IS 100 MILLION BTU/HOUR OR GREATER, PROVIDE FURNACE VOLUME (CUBIC FEET) NOTE: FURNACE VOLUME IS DEFINED AS THAT VOLUME BOUNDED BY THE FRONT FURNACE WALL WHERE THE BURNER IS LOCATED, THE FURNACE SIDE WATERWALL, AND EXTENDING TO THE LEVEL JUST BELOW OR IN FRONT OF THE FIRST ROW OF CONVECTION PASS TUBES. N/A - Less than 100 mmBtu/hr										
	-	NATURAL GAS	FUEL OIL	COAL	OTHER					
d) SINGLE FUEL (MAXIMU MILLION BTU/HOUR)	M -									
e) SINGLE FUEL (TYPICAL MILLION BTU/HOUR)	· -									
f) COMBINED FUEL (TYPICAL - MILLION BTU/HOUR) (IF APPLICABLE)										
	NATIID	AL GAS FIRIN	10							
22-1 CURRENT ORIGIN OF	NATUR	AL GAS FIRIT	vG							
NATURAL GAS:	22a) CURRENT ORIGIN OF NATURAL GAS: PIPELINE (FIRM CONTRACT) BY-PRODUCT, SPECIFY ORIGIN:									
	PIPELINE (INTERR CONTRACT)	UPTIBLE SUPPLY	Y OTHE	R, - SPECIFY:						
b) TYPICAL HEAT CONTEN	IT (BTU/SCF):			,						
4.000	•									
1,000 c) MAXIMUM	SCF/MONTH:		SCF/YEAR:							
CONSUMPTION	0.0 mmsef		1.114 m	ment						
d) TYPICAL	9.8 mmscf SCF/MONTH:		SCF/YEAR:	ilisci .						
CONSUMPTION	8.5 mmscf	•	100.3 m	mscf						
22-YOU TYPE (OUEON ONE)		FIRING - N/A								
23a) OIL TYPE (CHECK ONE)	NO. 1	NO. 2	NO. 4	NO. 5	NO. 6					
	OTHE	R, SPECIFY (INCL	UDE GENERATO	R OR SUPPLIER	₹):					
b) TYPICAL HEAT CONTEN	T·	CUS OIL U	SED ONLY AS A							
			RESERVE FUEL? YES NO							
BTU/LB - OR -	BTU/LB - OR - BTU/GAL									
d) TYPICAL SULFUR CONTENT AS FIRED (WT %): e) TYPICAL ASH CONTENT AS FIRED (WT %):										
f) MAXIMUM CONSUMPTION	GAL/MONTH:		GALYEA	IR:						
g) TYPICAL CONSUMPTION	GAL/MONTH:		GALYEA	R:						
h) FIRING DIRECTION:										
	HORIZONTAL	TANGENT	TAL OT	HER, SPECIFY:						

NAS NASSES	SOLID FU	EL FIRING- N/A						
*24a) SOLID FUEL TYPE (CHECK ALL THAT APPLY):	SUB-BITUMINOUS C	OAL LIGNITE COAL BITUMINOUS COAL OTHER, SPECIFY:						
b) TYPICAL HEAT CONTENT	AS FIRED (BTU/LE):	c) TYPICAL MOI	STURE CONTE	NT AS FIRED (WT %):				
d) TYPICAL SULFUR CONTE	NT AS FIRED (WT %):	e) TYPICAL ASH	CONTENT AS	FIRED (WT %):				
f) TYPICAL FINES CONTENT	(% LESS THAN 1/8 INCH):	g) IS THE COAL CLEANED?						
h) HOW MUCH COAL REFUSE	IS IN THE FUEL? (WT %):							
I) MAXIMUM CONSUMPTION	TON/MONTH:		TON/YEAR:					
J) TYPICAL CONSUMPTION	TON/MONTH:	4	TON/YEAR:					
NOTE: IF REQUIRED, SUBMIT (SPECIFICATIONS OF THE FUEL COAL, SUBMIT APPROPRIATE P ARE BLENDED AND ACTUALLY F	AND THE DURATION OF T ORTIONS OF ALL FUEL CO	ONS OF COAL SUPPHE CONTRACT. IF TONTRACTS AND STA	ET BOTTOM HER, SPECIFY LY CONTRACT HE ACTUAL FI	S WHICH SET FORTH THE				
	OTHER FUEL	FIRING - N/A						
5a) OTHER FUEL FIRING a) b)	TYPE		SUPF	PLIER				
b) TYPICAL HEAT CONTENT (SP	PECIFY UNITS):	c) TYPICAL NITRO	GEN CONTENT	TAS FIRED (WT %):				
d) TYPICAL SULFUR CONTENT	AS FIRED (WT %):	e) TYPICAL ASH CO	ONTENT AS FI	RED (WT %):				
) MAXIMUM CONSUMPTION	(SPECIFY UNITS/MON	TH);	(SPECIFY UNITS/YEAR):					
) TYPICAL CONSUMPTION	(SPECIFY UNITS/MON	тн):	(SPECIFY UNITS/YEAR):					

is a

APPLICATION PAGE 3-4
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П										 ,	1	
28) PROVIDE ANY SPECIFIC EMISSION STANDARDIS AND HMITATIONIES SELECT BY BILL FOR MALICAL ARE ADDITIONAL TO THE FAMILY OF BASTOLISM STANDARDIS AND HMITATIONIES SELECTED.	ICABLE 10 I HIS EMISSION UNIT (E.G., PARTICULATE MATTER,	REQUIREMENT(S)	Emissions so as to not violate provisions.	REQUIREMENT(S)	Maintain Records to demonstrate compliance	REQUIREMENT(S)	Annual Reporting	REQUIREMENT(S)		SSION UNIT: REQUIREMENT(S)	Testing , as requested by EPA	
APPLICABLE RULES	D) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLIC	EMISSION STANDARD(S)	35 IAC 201.141	27) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT: REGULATED AIR POLLUTANT(S) RECORDKEEPING RULE(S)	35 IAC 201.301	VHICH ARE APPLICABLE TO THIS EMISSION UNIT: REPORTING RULE(S)	35 IAC 201.302	WHICH ARE APPLICABLE TO THIS EMISSION UNIT: MONITORING RULE(S)		30) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT : REGULATED AIR POLLUTANT(S)	35 IAC 201,282	
26) PROVIDE ANY SPECIFIC FMISSION STANDARDIS	120, 130, 120, 120, 130, 130, 130, 130, 130, 130, 130, 13	REGULATED AIR POLLUTANT(S)	Regulated Pollutants	27) PROVIDE ANY SPECIFIC RECORDIKEEPING RULE REGULATED AIR POLLUTANT(S)	Regulated Pollutants	28) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT: REGULATED AIR POLLUTANT(S)	Regulated Pollutants	29) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE REGULATED AIR POLLUTANT(S)	N/A	30) PROVIDE ANY SPECIFIC TESTING RULES AND/C REGULATED AIR POLLUTANT(S)	Regulated Pollutants	

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APPLICATION PAGE 3-5 Printed on Recycled Paper 240-CAAPP

31) DOES THE EMISSION OTHERWISE APPLICA	UNIT QUALIFY FOR AN EXEMP	TION FROM AN	YES NO
IF YES, THEN LIST BO EXEMPTION. PROVIDE	OTH THE RULE FROM WHICH IT	IS EXEMPT AND THE RULE WHIC USTIFYING THE EXEMPTION. INC IND LABEL AS EXHIBIT 240-3, OR IS EXEMPTION.	SEUDE DE I MILLED
	COMPLIANO	E INFORMATION	
2) IS THE EMISSION UN	IT IN COMPLIANCE WITH ALL AF	PI ICARI E	YES NO
REQUIREMENTS?			
IF NO, THEN FORM 25 COMPLYING EMISSIC	94-CAAPP "COMPLIANCE PLAN! ON UNITS" MUST BE COMPLETE	SCHEDULE OF COMPLIANCE — ALD AND SUBMITTED WITH THIS AF	PELICATION.
B) EXPLANATION OF HO	W INITIAL COMPLIANCE IS TO	BE, OR WAS PREVIOUSLY, DEMO	NSTRATED:
	ural gas usage records.		
THE THE PART OF US	W SHESING COMPLIANCE WIL	I BE DEMONSTRATED:	
) EXPLANATION OF HO	W ONGOING COMPLIANCE WIL	L BE DEMONSTRATED.	
	and the state of the second		
Maintenance of nat	ural gas usage records.		
TE	STING MONITORING REC	CORDKEEPING AND REPO	RTING
12.	DOTHAT DEL ATE TO AIR EMIS	SIONS FOR WHICH RECORDS A	RE BEING MAINTAINED TO
COMMENTAL PROPERTY	WILL YOUR CVOILLE OF COME	TANCE INCLUDE THE UNIT OF I	VIEASUREIVIEIVI. ITIE
DETERMINE FEES, F	DEMENT AND THE EREQUENCE	Y OF SUCH RECORDS (E.G., HOL	JRLY, DAILY, WEEKLY):
METHOD OF MEASO	REMENT, AND THE THE GOLING		
PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
	- Triber	REPORT OF LINE AND A STORY	427.00
Gas usage	Therms	Gas Bill	Monthly

RECORDED PARAMETI	ER INCLUDE THE METHOD	CORDS WILL BE CREATED AND M OF RECORDKEEPING, TITLE OF F INTACT FOR REVIEW OF RECORD	PERSON RESPONSIBLE FOR
PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Gas Usage	Gas Bills	Facility Manager	Facility Manager
c) IS COMPLIANCE OF THE I	EMISSION UNIT READILY D	EMONSTRATED BY REVIEW OF	YES NO
IF NO, EXPLAIN:			Lanced Control
d) ARE ALL RECORDS READ SUBMITTAL TO THE AGEN IF NO, EXPLAIN:	ICY UPON REQUEST?		YES NO
COMPLIANCE:		VITIES USED TO DETERMINE FEE:	S, RULE APPLICABILITY OR
b) WHAT PARAMETER(S) IS(
c) DESCRIBE THE LOCATION	OF EACH MONITOR (E.G.,	IN STACK MONITOR):	

(Allego

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6d) IS EACH MC	NITOR EQUIPPED WI	ITH A RECORDING DEVICE!		YES	l NC
		JT A RECORDING DEVICE:			
IF NO, LIST AL	L MONITORS WITHOU	, Aires			
IS EACH MON	TOR REVIEWED FOR	ACCURACY ON AT LEAST A	QUARTERLY	YES	N
BASIS?					
IF NO, EXPLAI	N:	14			
		1			
					14
IC EACH MON	ITOR OPERATED AT A	ALL TIMES THE ASSOCIATED	EMISSION UNIT IS	YES	
IN OPERATION	N?				
IF NO, EXPLA	NI.				
T. GEVEN T. 24	IN.				
T december	IN.				
T NEVELLO					
E HELEVE					
i neter 25					
		IOST RECENT TESTS, IF AN	Y, IN WHICH THE RE	SULTS ARE USED	FOR
PROVIDE INF	ORMATION ON THE M	IOST RECENT TESTS, IF AN ON OF FEES, RULE APPLIC/ ING COMPANY, OPERATING	COMPUTIONIC EVICTI	NG DURING THE	TEST AND
PROVIDE INF	ORMATION ON THE M	IOST RECENT TESTS, IF AN ON OF FEES, RULE APPLICA ING COMPANY, OPERATING IONAL SPACE IS NEEDED, A	COMPUTIONIC EVICTI	NG DURING THE	TEST AND
PROVIDE INF PURPOSES C DATE, TEST M SUMMARY OF	ORMATION ON THE M IF THE DETERMINATION METHOD USED, TESTION FRESULTS, IF ADDIT	ING COMPANY, OPERATING IONAL SPACE IS NEEDED, A	COMPUTIONIC EVICTI	NG DURING THE	TEST AND
PROVIDE INFO PURPOSES CO DATE, TEST IN SUMMARY OF TEST DATE	ORMATION ON THE M	ON OF FEED, INDEED,	CONDITIONS EXIST TTACH AND LABEL A OPERATING	ING DURING THE AS EXHIBIT 240-4:	TEST AND
PROVIDE INF PURPOSES C DATE, TEST M SUMMARY OF	ORMATION ON THE M IF THE DETERMINATION METHOD USED, TESTION FRESULTS, IF ADDIT	ING COMPANY, OPERATING IONAL SPACE IS NEEDED, A	CONDITIONS EXIST TTACH AND LABEL A OPERATING	ING DURING THE AS EXHIBIT 240-4:	TEST AND
PROVIDE INFO PURPOSES CO DATE, TEST N SUMMARY OF TEST DATE	ORMATION ON THE M IF THE DETERMINATION METHOD USED, TESTION FRESULTS, IF ADDIT	ING COMPANY, OPERATING IONAL SPACE IS NEEDED, A	CONDITIONS EXIST TTACH AND LABEL A OPERATING	ING DURING THE AS EXHIBIT 240-4:	TEST AND
PROVIDE INFO PURPOSES CO DATE, TEST N SUMMARY OF TEST DATE	ORMATION ON THE M IF THE DETERMINATION METHOD USED, TESTION FRESULTS, IF ADDIT	ING COMPANY, OPERATING IONAL SPACE IS NEEDED, A	CONDITIONS EXIST TTACH AND LABEL A OPERATING	ING DURING THE AS EXHIBIT 240-4:	TEST AND
PROVIDE INFO PURPOSES CO DATE, TEST IN SUMMARY OF TEST DATE	ORMATION ON THE M IF THE DETERMINATION METHOD USED, TESTION FRESULTS, IF ADDIT	ING COMPANY, OPERATING IONAL SPACE IS NEEDED, A	CONDITIONS EXIST TTACH AND LABEL A OPERATING	ING DURING THE AS EXHIBIT 240-4:	TEST AND
PROVIDE INF PURPOSES C DATE, TEST IN SUMMARY OF TEST DATE	ORMATION ON THE M F THE DETERMINATION METHOD USED, TESTIF FRESULTS, IF ADDIT	TESTING COMPANY TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF	RESULTS
PROVIDE INF PURPOSES O DATE, TEST N SUMMARY OF TEST DATE N/A	DRMATION ON THE M F THE DETERMINATION METHOD USED, TESTI F RESULTS. IF ADDIT	ING COMPANY, OPERATING IONAL SPACE IS NEEDED, A	OPERATING CONDITIONS	SUMMARY OF	RESULTS
PROVIDE INFIPURPOSES CONTE, TEST DATE N/A DESCRIBE ALSUBMITTALS	ORMATION ON THE MOST THE DETERMINATION OF THE DETERMINATION OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE AGENCY:	TESTING COMPANY TESTING COMPANY	OPERATING CONDITIONS OPERATING CONDITIONS HE TITLE AND FREQUE	SUMMARY OF	RESULTS
PROVIDE INFI PURPOSES C DATE, TEST IN SUMMARY OF TEST DATE N/A DESCRIBE AL SUBMITTALS REPORTING	DRMATION ON THE M F THE DETERMINATION METHOD USED, TESTI F RESULTS. IF ADDIT	TESTING COMPANY TESTING COMPANY TESTING COMPANY TESTING COMPANY	OPERATING CONDITIONS OPERATING CONDITIONS HE TITLE AND FREQUENT	SUMMARY OF	RESULTS

											•
			X 1ACTUAL EMISSION RATE	ISSION RATE			ALLOWABLE BY RULE EMISSION RATE	Y RULE EMISSIC	ON RATE	² PERMITTED EMISSION RATE	SION RATE
			1UNCONTRO	¹ UNCONTROLLED EMISSIO	NRATE						
REGULATED AIR POLLUTANT		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3OTHER TERMS	3other TERMS	4 _{DM}	⁵ RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON	MAXIMUM:	1.12	5.0			6	()			1.12 lbs/lir	5.0
MONOXIDE (CO)	TYPICAL:	1.12	4.22			9	()				
LEAD	MAXIMUM:						()				
	TYPICAL:										
NITROGEN	MAXIMUM:	1.34	5.86			m	-			1.34	5.86
OXIDES (NOx)	TYPICAL:	1.34	5.02			6	()				
PARTICULATE	MAXIMUM:	0.1	0.44		Į.	n	()			0.1	0.44
MATTER (PART)	TYPICAL:	0.1	0.38			6	()				
PARTICULATE MATTER <= 10	MAXIMUM:						()				
MICROMETERS (PM10)	TYPICAL:						()				
SULFUR	MAXIMUM:	0.00	0.04			8	()			0.00	0.04
DIOXIDE (SO2)	TYPICAL:	0.00	0.04			8	()				
VOLATILE	MAXIMUM:	0.08	0.32			8	()			0.08	0.32
MATERIAL (VOM)	TYPICAL:	0.08	0.28			6	()				
OTHER, SPECIFY:	MAXIMUME						()				
	TYPICAL:						()				
EXAMPLE: PARTICULATE	MAXIMUM	5:00	21.9	0.3 GR/DSCF			6.0 (LBS/HB)	212.821	26.28	5.5 LBS/HR	1.52
MATTER	TYPICAL	4.00	14.4	-0.24 GR/DSOF			5.5(LBS/HR)	212,321	19.80		

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MPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 240-5.

¹CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE; INCLUDING INDOORS. SEE INSTRUCTIONS.

²PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.

³PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GROSCF, ETC.)

⁴DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)

⁵FATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

3-9 APPLICATION PAGE

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POUNDS PER TYPICAL: MAXIMUM: TYPICAL: TYPICAL: MAXIMUM: TYPICAL: TYPICAL: MAXIMUM: TYPICAL: TYPIC
--

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MPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 240-8.

PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.

²CAS - CHEMICAL ABSTRACT SERVICE NUMBER.

³PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GROSCF, ETC.).

⁴DM - DETERMINATION METHOD: 1) STACK TEST. 2) MATERIAL BALANCE. 3) STANDARD EMISSION FACTOR (AP 42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP 42 OR AIRS).

⁵RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

APPLICATION PAGE 3-10 Printed on Recycled Paper 240-CAAPP

E	XHAUST POINT I	NFORMATION					
THIS SECTION SHOULD NOT BE COMPLETED	F EMISSIONS ARE EXHA	USTED THROUGH AI	R POLLUTION CONTROL EQUIPMENT.				
41) FLOW DIAGRAM DESIGNATION OF E	XHAUST POINT:						
Boilers 1 and 2 42) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT							
42) DESCRIPTION OF EXHAUST POINT (DISCHARGES INDOORS, DO NOT CO	STACK, VENT, ROOF MPLETE THE REMAIL	MONITOR, INDOOR	RS, ETC.). IF THE EXHAUST TOWN				
Stacks for each unit		ICT DOINT DISCH	ARGE (FT):				
43) DISTANCE TO NEAREST PLANT BOL	INDARY FROM EXHAL	151 POINT DISCHA	aroc (i i).				
100							
44) DISCHARGE HEIGHT ABOVE GRADE	(FT):						
11, 2,000, 11, 11, 11, 11, 11, 11, 11, 11, 11							
50 45) GOOD ENGINEERING PRACTICE (GE	P) HEIGHT, IF KNOW	N (FT):					
45) GOOD ENGINEERING PRACTICE (CE							
	TOP A NON	OIDCLII AD EVHAL	IST POINT THE DIAMETER IS				
46) DIAMETER OF EXHAUST POINT (FT) 1.128 TIMES THE SQUARE ROOT OF	: NOTE: FOR A NON THE AREA.	CIRCULAR EXPAC	ST CHAT, THE DIRWING TO				
1.5	a) MAXIMUM (ACFM)	:	b) TYPICAL (ACFM):				
47) EXIT GAS FLOW RATE			2500				
	~2500		~2500 b) TYPICAL (°F):				
48) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):		b) TT IOAL (T).				
	~500		~500				
49) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):							
40/01/1201/01/01							
Vertical 50) LIST ALL EMISSION UNITS AND COM	ITPOL DEVICES SER	VED BY THIS EXH	AUST POINT:				
50) LIST ALL EMISSION UNITS AND CO	VIROL DE VIOLE CEIT		THE STAND DESIGNATION				
NAME			OW DIAGRAM DESIGNATION				
a) Boiler 1 and 2		Boilers 1 and 2	2				
b)							
c)							
d)							
e)							
THE FOLLOWING INFORMATION NEED ONLY	RE SUPPLIED IF READIL	Y AVAILABLE.					
51a) LATITUDE:		b) LONGITUDE:					
		7/28 A.	c) UTM HORIZONTAL (KM):				
52) UTM ZONE:	b) UTM VERTICAL	KM):	C) OTHER HORIZON TALL (Sample				

eria Sin

Exhibit 240-1 AP-42 EMISSIONS CALCULATIONS 200 BHP Boiler 1

Operating Hours Firing Rate
 Typical
 Maximum
 Units

 7,488
 8,760
 hours

 6.70
 6.70
 million Btu/hr

Heating Value 1000 Btu/scf

Example Calculation

$$\left(\frac{7.0 \times 10^6 \text{ Btu}}{\text{hr}}\right) \times \left(\text{AP} - 42 \text{ Emission Factor}\right) \times \left(\frac{1 \text{ scf}}{1,000 \text{ Btu}}\right) = \left(\frac{\times \text{ lbs pollutant}}{hr}\right)$$

$$\left(\frac{x \text{ lbs pollutant}}{hr}\right) \times \left(\frac{Operating \text{ hrs}}{yr}\right) \times \left(\frac{1 \text{ ton}}{2,000 \text{ lbs}}\right) = \left(\frac{y \text{ tons pollutant}}{yr}\right)$$

TYPICAL SEASON EMISSIONS

Pollutant	Rate	Units	AP-42 Emission Factor (lb/10^6 sch)	(Btu/scf)	Emissions (lb/hr)	Operating Hours	Emissions (tons/year)
From Natural Gas Firing	24810	0		(Democr)	()	Operating Hours	Emiliations (tons/year)
Particulate Matter (PM)	6.70	10^6 Btu/hr					
Filterable							
- Condensable							4
Total			7.60	1000	0.05	7488	0.19
Carbon Monoxide (CO)	6.70	10^6 Btu/hr	84.00	1000	0.56	7488	2.11
Nitrogen Oxides (NOx)	6.70	10^6 Btu/hr	100.00	1000	0.67	7488	2.51
Volatile Organic Compounds (VOC)	6.70	10^6 Btu/hr	5.50	1000	0.04	7488	0.14
Sulfur Dioxide (SO2)	6.70	10^6 Btu/hr	0.60	1000	0.00	7488	0.02
Ammonia (NH3)	96.00	10^6 Btt/hr	0.49	1000	0.05	1840	0.19

MAXIMUM EMISSIONS

<u> </u>	0.4	10.1	AP-42 Emission	Heating Value	Emissions	united at the con-	a sametal c
Pollutant	Rate	Units	Factor (lb/10^6 sef)	(Btu/scf)	(lb/hr)	Operating Hours	Emissions (tons/year)
From Natural Gas Firing							
Particulate Matter (PM)	6.70	10^6 Btu/hr					
Filterable							
Condensable							
Total			7.60	1000	0.05	8760	0.22
Carbon Monoxide (CO)	6.70	10^6 Btu/hr	84.00	1000	0.56	8760	2.47
Vitrogen Oxides (NOx)	6.70	1006 Btu/hr	100.00	1000	0.67	8760	2.93
Volatile Organic Compounds (VOC)	6.70	10^6 Btu/hr	5.50	1000	0.04	8760	0.16
Sulfur Dioxide (SO2)	6.70	10^6 Btu/hr	0.60	1000	0.00	8760	0.02
Ammonia (NH3)	96.00	10^6 Btu/hr	0.49	1000	0.05	5320	0.22

Annual Natural Gas Fuel Use

50.17 million scf/yr. (typ.)

58.69 million scf/yr. (max.)

0.0067 million scf/hr

Exhibit 240-2 **AP-42 EMISSIONS CALCULATIONS** 200 BHP Boiler 2 (Steam)

Operating Hours .Firing Rate

Typical Maximum 7,488 8,760

6.70

6.70

Units hours

million Btu/hr

Heating Value 1000 Btu/scf

&Example Calculation

$$\left(\frac{7.0 \times 10^{6} \text{ Btu}}{\text{hr}}\right) \times \left(\text{AP} - 42 \text{ Emission Factor}\right) \times \left(\frac{1 \text{ scf}}{1,000 \text{ Btu}}\right) = \left(\frac{\text{x lbs pollutant}}{\text{hr}}\right)$$

$$\left(\frac{\text{x lbs pollutant}}{\text{hr}}\right) \times \left(\frac{Operating \ hrs}{yr}\right) \times \left(\frac{1 \ ton}{2,000 \ lbs}\right) = \left(\frac{y \ tons \ pollutant}{yr}\right)$$

TYPICAL SEASON EMISSIONS

- ₹							
Pollutant	Rate	Units	AP-42 Emission Factor (lb/10^6 scf)	Heating Value (Btu/scf)	Emissions (lb/hr)	Operating Hours	Emissions (tons/year)
Poliutant	Rate	Onto	racioi (ibiro viser)	(21231)	(- J	
From Natural Gas Firing							
articulate Matter (PM)	6.70	10^6 Btu/hr					
Filterable							
Condensable							
Total			7.60	1000	0.05	7488	0.19
Carbon Monoxide (CO)	6.70	10^6 Btu/hr	84.00	1000	0.56	7488	2.11
Nitrogen Oxides (NOx)	6.70	10^6 Btu/hr	100.00	1000	0.67	7488	2.51
Volatile Organic Compounds (VOC)	6.70	- 10^6 Btu/hr	5.50	1000	0.04	7488	0.14
Sulfur Dioxide (SO2)	6.70	10^6 Btu/hr	0.60	1000	0.00	7488	0.02
Ammonia (NH3)	96.00	10^6 Btu/hr	0.49	1000	0.05	1840	0.19

MAXIMUM EMISSIONS

?oliutant	Rate	Units	AP-42 Emission Factor (lb/10^6 scf)	Henting Value (Btu/scf)	Emissions (lb/hr)	Operating Hours	Emissions (tons/year)
From Natural Gas Firing							
Particulate Matter (PM)	6.70	10^6 Btu/hr					
Filterable							
Condensable							
Total		` `	7.60	1000	0.05	8760	0.22
Carbon Monoxide (CO)	6.70	10^6 Btu/hr	84.00	1000	0.56	8760	2.47
Vitrogen Oxides (NOx)	6.70	10^6 Btu/hr	100.00	1000	0.67	8760	2.93
√olatile Organic Compounds (VOC)	6.70	10^6 Btu/hr	5.50	1000	0.04	8760	0.16
iulfur Dioxide (SO2)	6.70	10^6 Btu/hr	0.60	1000	0.00	8760	0.02
Ammonia (NH3)	96.00	10^6 Btu/hr	0.49	1000	0.05	5320	0.22

Annual Natural Gas Fuel Use

50.17 million scf/yr. (typ.)

58.69 million scf/yr. (max.)

0.0067 million scf/hr



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

Revision #: _			
Date:	1_		_
Page		of _	

AIR POLL	UTION CONTROL
E	QUIPMENT
DATA AN	ID INFORMATION

FOR AGENCY USE	ONLY
ID NUMBER:	
CONTROL EQUIPMENT #:	
DATE:	

THIS FORM MUST BE COMPLETED FOR EACH AIR POLLUTION CONTROL EQUIPMENT.
COMPLETE AND PROVIDE THIS FORM IN ADDITION TO THE APPLICABLE ADDENDUM FORM 260A THROUGH 260-K. A SEPARATE FORM MUST BE COMPLETED FOR EACH MODE OF
OPERATION OF AIR POLLUTION CONTROL EQUIPMENT FOR WHICH A PERMIT IS BEING
SOUGHT.

S	OURCE INFORMATION	_
1) SOURCE NAME:		
NACME Steel Processing	3) SOURCE ID NO.	
2) DATE FORM PREPARED: 9/30/05	(IF KNOWN): 031600FWL	

GENERAL II	NFORMATION	
) NAME OF AIR POLLUTION CONTROL EQUIPMENT AND/O	OR CONTROL SYSTEM:	
ni II II - Cambbor		
5) FLOW DIAGRAM DESIGNATION OF CONTROL EQUIPME	NT AND/OR CONTROL SYSTEM:	
) FLOW DIAGRAM DEGICIALITIES OF		
Scrubber	10.	
MANUFACTURER OF CONTROL EQUIPMENT (IF KNOWN	NJ:	
PRO-ECO		
7) MODEL NUMBER (IF KNOWN):	B) SERIAL NUMBER (IF KNOWN):	
Vincential Vincential		
TO TO TO TO TO TO TO TO TO TO TO TO TO T	a) CONSTRUCTION (MONTH/YEAR):	
DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION	EV SENSONS DISJUNIA AND A	
OF THIS EQUIPMENT (ACTUAL OR PLANNED)	THE PARTY OF THE PARTY.	
	b) OPERATION (MONTH/YEAR):	
	William Company	
	c) LATEST MODIFICATION (MONTH/YEAR):	
	Control of the second of the s	
10) BRIEFLY DESCRIBE MODIFICATION (IF APPLICABLE):		

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1038.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE 4-1

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	COMPLIAN	NCE INFORMATION		
REQUIREMENTS?	YSTEM IN COMPLIANCE WITH ,	ALL APPLICABLE	YES	NO
	294-CAAPP "COMPLIANCE PLA ION UNITS" MUST BE COMPLET	FD WAD SORWILLED M	TH THIS APPLICATION.	RNON
22) EXPLANATION OF H	OW INITIAL COMPLIANCE IS TO	D BE, OR WAS PREVIOL	JSLY, DEMONSTRATED:	***************************************
	ter flow to scrubber and em.			
			•	
23) EXPLANATION OF	HOW ONGOING COMPLIANCE	WILL BE DEMONSTRAT	ED:	
Maintenance of wate	er flow and maintenance rec	ords.		
		·.	•	
				1
TES 4a) LIST THE PARAMETEI	TING, MONITORING, REC	ORDKEEPING AND	REPORTING	
	JLE APPLICABILITY OR COMPL EMENT, AND THE FREQUENCY			
PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASURE	MENT FREQUEN	CY
Scrubber Water Flow	Gallons	Flow meter	Monitore Continuo	eď
			Recorded (Опсе
	,			

APPLICATION PAGE 4-4
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PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Scrubber Water Flow	Flow Log	Shift Operator	Production Manager
E COMPLIANCE OF THE REVIEW OF THE RECOR	CONTROL EQUIPMENT RE		YES
RE ALL RECORDS REA	DILY AVAILABLE FOR INSPE	ECTION, COPYING AND/OR	YES
RE ALL RECORDS REALUBMITTAL TO THE AGE F NO, EXPLAIN:	DILY AVAILABLE FOR INSPENCY UPON REQUEST?	ECTION, COPYING AND/OR	YES
UBMITTAL TO THE AGE	DILY AVAILABLE FOR INSPE NCY UPON REQUEST?	ECTION, COPYING AND/OR	XES
EUBMITTAL TO THE AGE	NCY UPON REQUEST?		
DESCRIBE ANY MONITO	DRS OR MONITORING ACTI	ECTION, COPYING AND/OR VITIES USED TO DETERMINE FE	
EUBMITTAL TO THE AGE F NO, EXPLAIN: DESCRIBE ANY MONITO	DRS OR MONITORING ACTI		
DESCRIBE ANY MONITO	ORS OR MONITORING ACTI	VITIES USED TO DETERMINE FE	ES, RULE APPLICABILITY C
DESCRIBE ANY MONITO	ORS OR MONITORING ACTI		ES, RULE APPLICABILITY C
DESCRIBE ANY MONITOR COMPLIANCE: Continuous flow mon. WHAT OPERATING PARA	ORS OR MONITORING ACTI	VITIES USED TO DETERMINE FE	ES, RULE APPLICABILITY O
DESCRIBE ANY MONITOR COMPLIANCE: Continuous flow mon. WHAT OPERATING PARA	ORS OR MONITORING ACTI	VITIES USED TO DETERMINE FE	ES, RULE APPLICABILITY O

REGULATED AIR POLLUTANT(S)	TU(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE AFE APPE APPE APPE APPE APPE APPE APPE	REGULATED AIR POLLUTANT(S) EMISSION STANDARD(S) EMISSION STANDARD(S)
ION		REQUIREMENT(S)
Du l	40 CFR 63, Subpart CCC	No HCI in a concentration in excess of 18 ppmv or mass emission rate that corresponds to a collection efficiency of less than 97%
PROVIDE ANY SPECIFIC RECORDIKEEPING F	25) PROVIDE ANY SPECIFIC RECORDICEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:	
REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
HCI	35 IAC 201.301	Compliance Records
нсі	40 CFR 63. 1160	Operations and Maintenance Plan/Inspection Records
нсі	40 CFR 63.10	Relevant Records
PROVIDE ANY SPECIFIC REPORTING RULE(6 REGULATED AIR POLLUTANT(8)	26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT: REGULATED AR POLLUTANT(S) REPORTING RULE(S)	REO! IIDEMENT (6)
HCI	35 IAC 201.302	Annual Reporting/Complance Notification
НСІ	40 CFR 63.89(e)(3)	Testing Notification and Methods
PROVIDE ANY SPECIFICATION CITIZENS		
REGULATED AIR POLLUTANT(S)	S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT: MONITORING RULE(S)	REQUIREMENT(S)
HCI	201.281	Emission Source/Device Monitoring
HCI	40 CFR 63.1160	Pressure Drop Across Scrubber (Once Per Shift)
HCI	40 CFR 63.1162	Scrubber Water Flow
PROVIDE ANY SPECIFIC TESTING RULES AN REGULATED AIR POLLUTANT(S)	28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT: REGULATED AIR POLLUTANT(S) TESTING RULE(S)	MISSION UNIT:
нсі	35 IAC 201.282/40 CFR 63,1161 and 1162	Emission Testing As Remitred
нсі	40 CFR 63.7 and 63.8(e)(4)	Emission Testing to Establish Complance with Relevant Limit

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7.7.7

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APPLICATION PAGE 4-3
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280-CAAPP

Steel Pickling Line 3, HCl Storage Tank Vents			
3, HCl Storage Tank Vents	Steel Pickling Line		
	HCL Storage Tanks 1-3		
If yes, explain and identify which mode is covered in a separate air pollution control equipment form: completed for each mode):	BY THIS FORM (NOTE:		
3) IDENTIFY ALL ATTACHMENTS TO THIS FORM RELATED TO TECHNICAL DRAWINGS): None OPERATING SC			
A) IDENTIES ANY PERIOD WHEN THE CONTROL EQUIPMENT V	WILL NOT BE OPERATING DUE TO SCHEDULED		
MAINTENANCE AND/OR REPAIRS WHEN THE FEEDING EMIS IN OPERATION: Not Applicable – Will be operated at all times Steel Pick			
	DING EMPORION LIMITED WHEN THE CONTROL		
5a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEED EQUIPMENT IS/ARE NOT USED:	DING EMISSION UNIT(S) WHEN THE CONTROL		
5a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEED EQUIPMENT IS/ARE NOT USED: Not Applicable - See #14	DING EMISSION UNIT(S) WHEN THE CONTROL		
EQUIPMENT IS/ARE NOT USED:	DING EMISSION UNIT(S) WHEN THE CONTROL		
EQUIPMENT IS/ARE NOT USED:	X		

斯姆

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.	PCB No. 13 - 12 (Enforcement – Air)
NACME STEEL PROCESSING, LLC,	j
a Delaware limited liability corporation,)
Respondent.)

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 9
SEPTEMBER 20, 2005 NOTICE OF
INCOMPLETENESS ('SEPTEMBER 2005
NOTICE OF INCOMPLETENESS")

NOTICE OF INCOMPLETENESS

September 20, 2005

NACME Steel Processing, LLC

Attn: John Dubrock 429 West 127th Street Chicago, Illinois 60628

<u>Application No.:</u> 96020074 I.D. No.: 031600FWL

Applicant's Designation:

<u>Date Received</u>: September 12, 2005 Operation of: Steel Pickling Plant

Location: 429 West 127th Street, Chicago

Illinois EPA has determined the above referenced operating permit application(s) to be incomplete because information was not provided as required by the 35 Ill. Adm. Code 201.157.

Specifically, the following information must be supplied in order for the application to be considered complete:

- The requested change in the facility operations (increase in the material throughput) constitutes a modification pursuant to the definition in 35 Ill. Adm. Code 201.102. Pursuant to Section 201.142 construction permit is required to be obtained prior to this modification.
- Updated information on production rate and emissions based on the most recent stack test (April 16, 2002) data.

Information contained in the stack test report indicates steel throughput 200 tons during the six-hours testing period or average process rate of 33.3 tons/hr. The average hydrogen chloride (HCl) emission rate during the stack test was 0.217 lb/hr. The emission factor derived from this stack test is 6.51 lbs of HCl per 1,000 tons of steel throughput, higher than 4.8 lbs/1,000 tons used in the current permit.

It also should be noted that since the plant cannot operate at the process rate higher than that during the stack test the annual steel throughput shall not exceed 33.3 tons/hr x 8,760 hr/yr = 292,000 tons/yr.

Detailed calculations of the plant-wide actual emission and potential to emit (PTE) of hazardous air pollutant (HAP), hydrogen chloride. PTE shall be calculated based on the maximum rated production capacity and year round operations. The credits for the control device efficiency may be taken only to the extent required by applicable environmental regulations.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 — (217) 782-3397 JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300. CHICAGO, IL 60601 — (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

The Illinois EPA's estimate of HCl PTE based on the maximum hourly controlled emission rate and control device manufacturer guaranteed efficiency results in more than 10 tons/yr of HCl emission.

You shall apply for Clean Air Act Permit Program (CAAPP) permit. To avoid the CAAPP permitting requirements, you may want to consider applying for a Federally Enforceable State Operating Permit (FESOP). A FESOP is an operating permit that contains federally enforceable limits in the form of permit conditions which effectively restrict the potential emissions of a source to below major source threshold, thereby excluding the source from the Clean Air Act Permit Program (CAAPP).

The Illinois EPA will be pleased to review a reapplication for this permit that includes the information and documentation necessary to correct the deficiencies noted above. In accordance with 35 Ill. Adm. Code 201.157, this reapplication may incorporate by reference the data and information submitted to the Illinois EPA in the original permit application, provided that you certify that the data and information previously submitted remains true, correct, and current. The reapplication will be considered filed on the date it is received by the Illinois EPA and will constitute a new permit application for purposes of Section 39(a) of the Act. Two copies of this information must be submitted and should reference the application and I.D. numbers assigned above.

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

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

DES:VJB:jar

cc: Region 1

ROCKFORD – 4302 North Main Street, Rockford, IL 61103 – (815) 987-7760 • DES PLAINES – 9511 W. Harrison St., Des Plaines, IL 60016 – (847) 294-4000 ELGIN – 595 South State, Elgin, IL 60123 – (847) 608-3131 • PEORIA – 5415 N. University St., Peoria, IL 61614 – (309) 693-5463

BUREAU OF LAND - PEORIA – 7620 N. University St., Peoria, IL 61614 – (309) 693-5462 • CHAMPAIGN – 2125 South First Street, Champaign, IL 61820 – (217) 278-5800

SPRINGFIELD – 4500 S. Sixth Street Rd., Springfield, IL 62706 – (217) 786-6892 • COLLINSVILLE – 2009 Mall Street, Collinsville, IL 62234 – (618) 346-5120

MARION – 2309 W. Main St., Suite 116, Marion, IL 62959 – (618) 993-7200

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
· v.) PCB No. 13 - 12) (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,)
a Delaware limited hability corporation,)
Respondent.)

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 8
AUGUST 23, 2005AIR EMISSION
OPERATING PERMIT SOURCE
RENEWAL
APPLICATION("SEPTEMBER 2005 SOP
RENEWAL APPLICATION")

AIR EMISSION SOURCE OPERATING PERMIT RENEWAL APPLICATION

Prepared for
NACME STEEL PROCESSING, INC.
429 West 127th Street
Chicago, Illinois

August 23, 2005

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MOSTARDI PLATT PROJECT M046005 (Renewal Application)

TABLE OF CONTENTS

APC 200	1
APC 210	
APC 220	4
APC 260	7
Process Flow Diagram	
Emission Calculations	14
Enclosure A (Scrubber gaseous emissions test)	15

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL 2200 CHURCHILL ROAD SPRINGFIELD, ILLINOIS 62794-9276

APPLICATION FOR PERMIT _(A) □ CONSTRUCT ○ OPERATE				I.D. NO.	FOR A	AGENCY USI	E ONLY	
NAME	OF EQUIPMENT TO BE FRUCTED OR OPERATED (B)	HCL Steel Pickling Line,	HCL-ASTs	PERMIT NO DATE	0.			
			7					
la. NAME OF OWNER: National Materials, LP			2a. NAME OF	2a. NAME OF OPERATOR: NACME Steel Processing, LLC				
Ib. STREET ADDRESS OF OWNER: 1965 Pratt Boulevard			2b. STREET	2b. STREET ADDRESS OF OPERATOR: 429 West 127 th Street				
Ic. CITY OF OWNER: Elk Grove Village		2c. CITY OF	OPERATOR:		hicago			
ld. ST	. STATE OF OWNER: Illinois le. ZIP CODE: 60007 2d. STATE OF OPERATOR: Illinois 2e. ZIP CODE:			DE: 60628				
3a. NA	AME OF CORPORATE DIVISION O NACME Steel P		3b. STREET A	DDRESS OF	F EMISSION S 429 Wes	SOURCE: st 127 th Str	eet	
3c. CI	TY OF EMISSION SOURCE: Chicago	3d. LOCATED WITHIN CITY LIMITS: ⊠ YES □ NO	3e. TOWNSH	P:	3f. COUNTY	': Cook	3g. ZIP CODE: 60628	
4. ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) John Dubrock 5. TELEPHONE NUMBER FOR AGENCY TO CALL: 219-391-6012								
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE) OWNER OPERATOR EMISSION SOURCE 7. YOUR DESIGNATION FOR THIS APPLICATION:(C) Steel Pickling				c)				
8. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATIONS REMAINS TRUE, CORRECT AND CURRENT, BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION. AUTHORIZED SIGNATURE(S):(D)					APPLICATIONS			
5 5 6 6 8	вү		BY	· m ID T			DATE	
	SIGNATURE William Riechle TYPED OR PRINTED NAM	DATE DATE		ATURE ED OR PRIN	TED NAME C	F SIGNER	DATE	
	Plant Manager TITLE OF SIGNER	JOP BIGHER	TITL	E OF SIGNE	R			
(A)	(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS FORM MAY BE USED TO REQUEST A CONSTRUCTION PERMIT, AN OPERATING PERMIT, A CONSTRUCTION OR OPERATING PERMIT.					PERATING FERMIT.		
(B) ENTER THE GENERIC NAME OF THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS NAME WILL APPEAR ON THE PERMIT, WHICH MAY BE ISSUED PURSUANT TO THIS APPLICATION. THIS FORM MUST BE ACCOMPANIED BY OTHER APPLICABLE FORMS AND INFORMATION.								
(C)	YOUR DESIGNATION WILL BE DESIGNATION MUST NOT EX	ITEM 7 ABOVE WHICH YOU WOULD EREFERENCED IN CORRESPONDENC CEED TEN (10) CHARACTERS.	E FROM THIS A	GENCY REI	LATIVE TO 1.	HIS APPLICA	TION. FOOR	
(D)	SUPPLEMENTS THERETO SHA EQUIPMENT, OR THEIR AUTH	SIGNED IN ACCORDANCE WITH 35 II ALL BE SIGNED BY THE OWNER AND IORIZED AGENT, AND SHALL BE ACC	COMPANIED BY	EVIDENCE	OF AUTHOR	ITY TO SIGN	THE APPLICATION."	
	DECOLUTION OF THE CORPO	R IS A CORPORATION, SUCH CORPOR RATION'S BOARD OF DIRECTORS AU OR OPERATION OF THE EQUIPMENT	THORIZING THI	E PERSONS	SIGNING TH	AGENCY A IS APPLICAT	CERTIFIED COPY OF A TION TO CAUSE OR	
H								

9.	DOES THIS APPLICATION CONTAIN A PLOT PLAN/MAP: YES NO				
	IF A PLOT PLAN/MAP HAS PREVIOUSLY BEEN SUBMITTED, SPECIFY AGENCY I.D. NUMBER <i>031600FWL</i> APPLICATION NUMBER	/: 9602	20074		
	IS THE APPROXIMATE SIZE OF APPLICANT'S PREMISES LESS THAN YES NO: SPECIFY ACRES 43	1 ACRE	3? •		
10.	DOES THIS APPLICATION CONTAIN A PROCESS FLOW DIAGRAM(S)	тнат а	ACCURATELY AND CLEARLY REPRESENTS CURRENT PRACTICE.		
lla.	WAS ANY EQUIPMENT, COVERED BY THIS APPLICATION, 11b. OWNED OR CONTRACTED FOR, BY THE APPLICANT PRIOR TO APRIL 14, 1972: YES NO	PRE	S ANY EQUIPMENT, COVERED BY THIS APPLICATION, NOT VIOUSLY RECEIVED AN OPERATING PERMIT: YES NO		
	IF "YES," ATTACH AN ADDITIONAL SHEET, EXHIBIT A, THAT:	IF "Y	YES," ATTACH AN ADDITIONAL SHEET, EXHIBIT B, THAT:		
	(a) LISTS OR DESCRIBES THE EQUIPMENT	(a)	LISTS OR DESCRIBES THE EQUIPMENT		
	(b) STATES WHETHER THE EQUIPMENT WAS IN COMPLIANCE WITH THE RULES AND REGULATIONS GOVERNING THE CONTROL OF AIR POLLUTION PRIOR TO APRIL 4, 1972	(b)	STATES WHETHER THE EQUIPMENT .		
		-	(i) IS ORIGINAL OR ADDITIONAL EQUIPMENT (ii) REPLACES EXISTING EQUIPMENT, OR (iii) MODIFIES EXISTING EQUIPMENT		
		. (c)	PROVIDES THE ANTICIPATED OR ACTUAL DATES OF THE COMMENCEMENT OF CONSTRUCTION AND THE START-UP OF THE EQUIPMENT		
12.	INFORMATIONINCORPORATION BY REFERENCE" BEEN COMPLETED. YES NO DOES THE STARTUP OF AN EMISSION SOURCE COVERED BY THIS APPLICATION PRODUCE AIR CONTAMINANT EMISSION IN EXCESS OF				
	APPLICABLE STANDARDS: YES NO IF "YES," HAS FORM APC-203, "OPERATION DURING STARTUP" BEEN COMPLETED FOR THIS SOURCE YES NO				
14.	DOES THIS APPLICATION REQUEST PERMISSION TO OPERATE AN E	MISSIO	IN SOURCE DURING MALFUNCTION OR BREAKDOWNS:		
	IF "YES," HAS FORM APC-204, "OPERATION DURING MALFUNCTION AND BREAKDOWN" BEEN COMPLETED FOR THIS SOURCE YES NO				
15.	IS AN EMISSION SOURCE COVERED BY THIS APPLICATION SUBJECTION SUBJE	T TO A	FUTURE COMPLIANCE DATE:		
	IF "YES," HAS FORM APC-202, "COMPLIANCE PROGRAM & PROJECT COMPLETION SCHEDULE," BEEN COMPLETED FOR THIS SOURCE: YES NO				
16.	DOES THE FACILITY COVERED BY THIS APPLICATION REQUIRE AN PLANS): YES NO				
17.	LIST AND IDENTIFY ALL FORMS, EXHIBITS, AND OTHER INFORMAT NUMBERS OF EACH ITEM (ATTACH ADDITIONAL SHEETS IF NECES	IION SU SARY):	JBMITTED AS PART OF THIS APPLICATION. INCLUDE THE PAGE:		
	See Table of Contents				
	TOTAL NUMBER OF PAGES				

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL 2200 CHURCHILL ROAD SPRINGFIELD, ILLINOIS 62794-9276

DATA AND DIFORMATION			u .	FOR AGENCY USE ONLY
DATA AND I INCORPORATION	NFORMATION NBY REFERENCE			
			,	
THIS FORM IS TO BE USED TO INCORF OF INFORMATION FROM A CONSTRUC APPLICATION INTO WHICH INFORMAT	JION PERMIT AL	PPLICATION INTO AN O	FROM ONE PERMIT A OPERATING PERMIT	PPLICATION TO ANOTHER, INCLUDING THE TRANSFE APPLICATION. THIS FORM SHOULD ACCOMPANY TH
1. NAME OF OWNER: National	Materials L. P.			DRATE DIV. OR PLANT ROM OWNER): NACME Steel Processing, LLC
3. STREET ADDRESS OF EMISSION SO 429 West 127 th Str	URCE: 4	. CITY OF EMISSION SC		5. IDENTIFICATION NUMBER: 031600FWL
(ADDI ICATIONANI MADED				
6. APPLICATION NUMBER: 96020074	7. L CON	ISTRUCTION 🔀	OPERATION St	eel Pickling Line
8. SHOULD ALL INFORMATION IN THI YES NO IF "NO", LIST ITEMS TO BE INCOR	ė	BE INCORPORATED BY	REFERENCE OR TRA	NSFERRED?
9a. ITEM TO BE INCORPORATED:			b. PAGE	c. FLOW DIAGRAM DESIGNATION (IF APPLICABLE):
	1			

		`		
				
10. DOES THE DATA & INFORMATION YES NO IF "NO", SUBMIT THE APPLICABLE CORRECT, CURRENT AND COMPL	FORMS AND CLI			
11. APPLICATION NUMBER:	T ₁₂ = □/	CONSTRUCTION	ODER A STORY	
	12. U C	CONSTRUCTION [_]	OPERATION	
13. SHOULD ALL INFORMATION IN THE YES NO IF "NO", LIST ITEMS TO BE INCORP		BE INCORPORATED BY	REFERENCE OR TRA	NSFERRED?
14a. ITEM TO BE INCORPORATED:			b. PAGE	c. FLOW DIAGRAM DESIGNATION (IF APPLICABLE):
· · · · · · · · · · · · · · · · · · ·				
	·····			
				
15. DOES THE DATA & INFORMATION I YES NO IF "NO", SUBMIT THE APPLICABLE CORRECT, CURRENT AND COMPLI	FORMS AND CLE			

Page 3

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL 2200 CHURCHILL ROAD SPRINGFIELD, ILLINOIS 62706

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039, Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

*DATA AND INFORMATION		
PROCESS EMISSION SOURCE		

*THIS INFORMATION FORM IS TO BE COMPLETED FOR AN EMISSION SOURCE OTHER THAN A FUEL COMBUSTION EMISSION SOURCE OR AN INCINERATOR. A FUEL COMBUSTION EMISSION SOURCE IS A FURNACE, BOILER, OR SIMILAR EQUIPMENT USED PRIMARILY FOR PRODUCING HEAT OR POWER BY INDIRECT HEAT TRANSFER. AN INCINERATOR IS AN APPARATUS IN WHICH REFUSE IS BURNED.

1. NAME OF PLANT OWNER: National Materials, LP	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): NACME Steel Processing, LLC
3. STREET ADDRESS OF EMISSION SOURCE: 429 West 127th Street	4. CITY OF EMISSION SOURCE: Chicago

GENERAL I	FORMATION				
5. NAME OF PROCESS: HCL Steel Pickling	6. NAME OF EMISSION SOURCE EQUIPMENT: Enclosed Steel Pickling Line				
7. EMISSION SOURCE EQUIPMENT MANUFACTURER: PRO-ECO	8. MODEL NUMBER: 9. SERIAL NUMBER:				
10. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE:	PL1				
11: IDENTITY(S) OF ANY SIMILAR SOURCE(S) AT THE PLANT OR PREMISES APPLICATION, IDENTIFY THE APPLICATION):	NOT COVERED BY THE FORM (IF THE SOURCE IS COVERED BY ANOTHER				
N	/A				
12. AVERAGE OPERATING TIME OF EMISSION SOURCE: 13. MAXIMUM OPERATING TIME OF EMISSION SOURCE: 24 HRS/DAY 7 DAYS/WK52 WKS/YR 24 HRS/DAY 7 DAYS/WK52 WKS/YR					
14. PERCENT OF ANNUAL THROUGHPUT:					
DEC-FEB <u>25</u> % MAR-MAY <u>25</u> %	JUN-AUG <u>25</u> % SEPT-NOV <u>25</u> %				

INSTRUCTIONS

- 1. COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
- 2. COMPLETE THE RAW MATERIAL, PRODUCT, WASTE MATERIAL, AND FUEL USAGE SECTIONS FOR THE PARTICULAR SOURCE EQUIPMENT. COMPOSITIONS OF MATERIALS MUST BE SUFFICIENTLY DETAILED TO ALLOW DETERMINATION OF THE NATURE AND QUANTITY OF POTENTIAL EMISSIONS. IN PARTICULAR, THE COMPOSITION OF PAINTS, INKS, ETC., AND ANY SOLVENTS MUST BE FULLY DETAILED.
- 3. EMISSION AND EXHAUST POINT INFORMATION MUST BE COMPLETED, UNLESS EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
- 4. OPERATING TIME AND CERTAIN OTHER ITEMS REQUIRE BOTH AVERAGE AND MAXIMUM VALUES.
- 5. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS," APC-201.

	DEFINITIONS
AVERAGE-	THE VALUE THAT <u>SUMMARIZES</u> OR <u>REPRESENTS</u> THE <u>GENERAL CONDITION</u> OF THE <u>EMISSION SOURCE</u> , OR
	THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE, SPECIFICALLY:
AVERAGE OPERATING TIME-	ACTUAL TOTAL HOURS OF OPERATION FOR THE PRECEDING TWELVE MONTH PERIOD.
AVERAGE RATE-	ACTUAL TOTAL QUANTITY OF "MATERIAL" FOR THE PRECEDING TWELVE MONTH PERIOD, DIVIDED BY THE AVERAGE OPERATING TIME.
AVERAGE OPERATION-	OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.
MAXIMUM-	THE <u>GREATEST</u> VALUE <u>ATTAINABLE</u> OR <u>ATTAINED</u> FROM THE <u>EMISSION SOURCE</u> , OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE, SPECIFICALLY:
MAXIMUM OPERATING TIME-	GREATEST EXPECTED TOTAL HOURS OF OPERATIONS FOR ANY TWELVE MONTH PERIOD.
MAXIMUM RATE-	GREATEST QUANTITY OF "MATERIAL" EXPECTED PER ANY ONE HOUR OF OPERATION.
MAXIMUM OPERATION-	GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

090-008

	RAW M	IATERIAL INFORMAT	ION					
	NAME OF RAW MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE				MAXIMUM RATE PER IDENTICAL SOURCE		
20a.	Steel Coils "	b.	171,233	LB/HR	c.	u	171,233	LB/HR
21a.	HCL Solution	b	2,200	LB/HR	c.		2,20 0	LB/HR
22a.	Water	b.	34,000	LB/HR	c.		34,000	LB/HR
23a.		b		LB/HR	c.			LB/HR
24a.		b.		LB/HR	c.			LB/HR

PRODUCT INFORMATION								
NAME OF PRODUCT			AVERAGE RATE PER IDENTICAL SOURCE			MAXIMUM RATE PER IDENTICAL SOURCE		
30a.	Unscaled Steel Coils	b.	171,233	LB/HR	C.	171,233	LB/HR	
31a.		b.		LB/HR	c.		LB/HR	
32a.	•	b.		LB/HR	c.		LB/HR	
33a.		b.		LB/HR	c.		LB/HR	
34a.		ъ.		LB/HR	c.		. LB/HR	

WASTE MATERIAL INFORMATION								
NAME OF WASTE MATERIAL			AVERAGE RATE PER IDENTICAL SOURCE			MAXIMUM RATE PER IDENTICAL SOURCE		
40a.	Ferrous Chloride	ъ.	5,800	LB/HR	c.	5,800	LB/HR	
41a.		ъ.		LB/HR	c.		LB/HR	
42a.		b.		LB/HR	c.		LB/HR	
43a.		b.		LB/HR	c.		LB/HR	
44a.		b.		LB/HR	C.		LB/HR	

*FUEL USAGE INFORMATION — Not Applicable						
	FUEL USED		Т	YPE	HEAT CONTENT	
50a.	NATURAL GAS		b. ·		c.	BTU/SCF
	OTHER GAS					BTU/SCF
	OIL					BTU/GAL
	COAL				•	BTU/LB
	OTHER			٠		BTU/LB
d. AVERAGE FIRING RATE PER IDENTICAL SOURCE: BTU/HR			OURCE: BTU/HR	e. MAXIMUM FIRING RATE PE	ER IDENTICAL SOURCE:	BTU/HR

^{*} THIS SECTION IS TO BE COMPLETED FOR ANY FUEL USED DIRECTLY IN THE PROCESS EMISSION SOURCE, E.G. GAS IN A DRYER, OR COAL IN A MELT FURNACE.

		*	EMISSION IN	FORMATION	
51. NUMBER OF IDI	ENTICAL SOURCES (I	DESCRIBE AS REQUI	RED):		
			AVERAG	E OPERATION	
CONTAMINANT	CONCENTRATION	<u>OR</u> EMISSION RATE	PER IDENTIC	METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE	
PARTICULATE MATTER	52a.	GR/SCF	ъ.	LB/HR	c.
CARBON MONOXIDE	53a.	PPM (VOL)	b.	LB/HR	С.
NITROGEN OXIDES	54a.	PPM (VOL)	b.	LB/HR	C
ORGANIC MATERIAL	55a.	PPM (VOL)	b.	LB/HR	С.
SULFUR DIOXIDE	56a.	PPM (VOL)	b.	LB/HR	c.
**OTHER (SPECIFY)	57a.	PPM (VOL)	b.	LB/HR	c. See APC 260
			MAXIMUM O	PERATION	
CONTAMINANT	CONCENTRATION	<u>OR</u> EMISSION RATE	PER IDENTIC	AĻ SOURCE	METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	58a.	GR/SCF	b.	LB/HR	c .
CARBON MONOXIDE	59a.	PPM (VOL)	b.	LB/HR	c
NITROGEN OXIDES	60a.	PPM (VOL)	b.	LB/HR	c.
ORGANIC MATERIAL	61a.	PPM (VOL)	Ъ.	LB/HR	c.
SULFUR DIOXIDE	62a.	PPM (VOL)	b.	LB/HR	c.
**OTHER (SPECIFY)	63a.	PPM (VOL)	b.	LB/HR	c. See APC 260

- ITEMS 52 THROUGH 63 NEED NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
- * "OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

***EXHAUST POINT	INFORMATION
64. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT: See A	PC 260
65. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDIN	NGS, DIRECTION, HOODING, ETC.):
66. EXIT HEIGHT ABOVE GRADE:	67. EXIT DIAMETER:
68. GREATEST HEIGHT OF NEARBY BUILDINGS:	69. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: FT
AVERAGE OPERATION	MAXIMUM OPERATION
70. EXIT GAS TEMPERATURE:	72. EXIT GAS TEMPERATURE: °F
71. GAS FLOW RATE THROUGH EACH EXIT: ACFM	73. GAS FLOW RATE THROUGH EACH EXIT: ACFM

^{***} THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL 2200 CHURCHILL ROAD SPRINGFIELD, ILLINOIS 62706

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039, Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

*DATA AND INFORMATION	
AIR POLLUTION CONTROL EQUIPMENT	

* THIS INFORMATION FORM IS FOR AN INDIVIDUAL UNIT OF AIR POLLUTION CONTROL EQUIPMENT OR AN AIR POLLUTION CONTROL SYSTEM.

1. NAME OF OWNER: NACME Steel Processing	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): NACME Steel Processing			
3. STREET ADDRESS OF CONTROL EQUIPMENT: 429 West 127 th Street	4. CITY OF CONTROL EQUIPMENT: Chicago			
5. NAME OF CONTROL EQUIPMENT OR CONTROL SYSTEM: PRO-ECO Wet Scrubber				

INSTRUCTIONS

- COMPLETE THE ABOVE IDENTIFICATION. 1.
- COMPLETE THE APPROPRIATE SECTION FOR THE UNIT OF CONTROL EQUIPMENT, OR THE APPROPRIATE SECTIONS FOR THE CONTROL SYSTEM. BE CERTAIN THAT THE ARRANGEMENT OF VARIOUS UNITS IN A CONTROL SYSTEM IS MADE CLEAR IN THE PROCESS FLOW DIAGRAM.
- COMPLETE PAGE 6 OF THIS FORM, EMISSION INFORMATION AND EXHAUST POINT INFORMATION.
- EFFICIENCY VALUES SHOULD BE SUPPORTED WITH A DETAILED EXPLANATION OF THE METHOD OF CALCULATION, THE MANNER OF ESTIMATION, OR THE SOURCE OF INFORMATION. REFERENCE TO THIS FORM ANY RELEVANT INFORMATION OR EXPLANATION INCLUDED IN THIS PERMIT APPLICATION.
- EFFICIENCY VALUES AND CERTAIN OTHER ITEMS OF INFORMATION ARE TO BE GIVEN FOR AVERAGE AND MAXIMUM OPERATION OF THE SOURCE EQUIPMENT. FOR EXAMPLE, "MAXIMUM EFFICIENCY" IS THE EFFICIENCY OF THE CONTROL EQUIPMENT WHEN THE SOURCE IS AT MAXIMUM OPERATION, AND "AVERAGE FLOW RATE" IS THE FLOW RATE INTO THE CONTROL EQUIPMENT WHEN THE SOURCE IS AT AVERAGE OPERATION.
- FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS", APC-201.

	DEFINITIONS
AVERAGE-	THE VALUE THAT <u>SUMMARIZES</u> OR <u>REPRESENTS</u> THE <u>GENERAL CONDITION</u> OF THE <u>EMISSION SOURCE</u> OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
AVERAGE OPERATION-	OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.
MAXIMUM-	THE <u>GREATEST</u> VALUE <u>ATTAINABLE</u> OR <u>ATTAINED</u> FROM THE <u>EMISSION SOURCE</u> , OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
MAXIMUM OPERATION-	THE GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

ADSORPTION UNIT - Not Applicable				
1. FLOW DIAGRAM DESIGNATION(S) OF ADSORPTION UNIT:				
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:			
4. ADSORBENT: C ACTIVATED CHARCOAL: TYPE	□ OTHER: SPECIFY:			
5. ADSORBATE(S):				
6. NUMBER OF BEDS PER UNIT:	7. WEIGHT OF ADSORBENT PER BED:			
8. DIMENSION OF BED: THICKNESSIN, SURFACE AREASQUARE IN				
9. INLET GAS TEMPERATURE	10. PRESSURE DROP ACROSS UNIT: INCH H₂O GAUGE			
11. TYPE OF REGENERATION: REPLACEMENT STEAM OTHER: SPECIFY:				
12. METHOD OF REGENERATION:				
☐ ALTERNATE USE OF ENTIRE UNITS ☐ SOURCE SHUT DOWN ☐ OTHER: DESCRIBE	ALTERNATE USE OF BEDS IN A SINGLE UNIT			
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE			
13. TIME ON LINE BEFORE REGENERATION: MIN/BED	15. TIME ON LINE BEFORE REGENERATION: MIN/BED			
14. EFFICIENCY OF ABSORBER (SEE INSTRUCTION 4): %	16. EFFICIENCY OF ABSORBER (SEE INSTRUCTION 4): %			
AFTERBURNER - No.	of Applicable			
1. FLOW DIAGRAM DESIGNATION(S) OF AFTERBURNER:				
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:			
4. COMBUSTION CHAMBER DIMENSIONS: LENGTH IN, CROSS-SECTIONAL AREA SQUARE IN				
5. INLET GAS TEMPERATURE:	7. FUEL GAS OIL:SULFUR WT%			
6. OPERATING TEMPERATURE OF COMBUSTION CHAMBER: °F	8. BURNERS PER AFTERBURNER: @ BTU/HR EACH			
9. CATALYST USED: NO YES: DESCRIBE CATALYST	•			
10. HEAT EXCHANGER USED: NO YES: DESCRIBE HEAT EXCHANGER				
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE			
11. GAS FLOW RATE: SCFM	13. GAS FLOW RATE: SCFM			
12. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): %	14. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): %			

CYCLONE - Not Applicable					
1. FLOW DIAGRAM DESIGNATION(S) OF CYCLONE:					
2. MANUFACTURER:	3. MODEL:	J			
4. TYPE OF CYCLONE: SIMPLE MULTIPLE	5. NUMBER OF CYCLONES IN EACH MULTIPLE CYCLONE:				
6. DIMENSION THE APPROPRIATE SKETCH (IN INCHES) OR PROVIDE A DRA	WING WITH EQUIVALENT INFORMATION:				
•					
		enile conjunte minima prima in management per per per per per per per per per per			
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE	,			
7. GAS FLOW RATE: SCFM	9. GAS FLOW RATE:	M			
8. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4): %	10. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4):	%			

CONDENSER - Not Applicable						
1. FLOW DIAGRAM DESIGNATION(S) OF	CONDENSER:					
2. MANUFACTURER:	3.	MODEL NAME AND	NUMBER:	4. HEAT EX	CHANGE AREA:	FT ²
AVERAGE OPERATION OF SOURCE			МА	XIMUM OPER	ATION OF SOURCE	- U
5. COOLANT FLOW RATE PER CONDENS	SER:		10. COOLANT FLOW RATE PER CONDENSER:			
WATER GPMAIR SCF OTHER: TYPE FLOW RATE	M 		WATER GPMAIR SCFM OTHER: TYPE,FLOW RATE			
6. GAS FLOW RATE:		SCFM	11. GAS FLOW RATE:			SCFM
	GAS TEMPERA		12. COOLANT TEMPER. INLET°F, OUTLE		13. GAS TEMPERA INLET°F, O	
9. EFFICIENCY OF CONDENSER (SEE INS	TRUCTION 4):	%	14. EFFICIENCY OF COI	NDENSER (SEI	E INSTRUCTION 4):	%
	*EL	ECTRICAL PRECIPIT	ATOR - Not Applicable			
1. FLOW DIAGRAM DESIGNATION OF EL	ECTRICAL PRE	CIPITATOR:			,	
2. MANUFACTURER:			3. MODEL NAME AND	NUMBER:		
4. COLLECTING ELECTRODE AREA PER	CONTROL DEV	ICE:				FT²
AVERAGE OPERATION	ON OF SOURCE		MA	XIMUM OPER	ATION OF SOURCE	
5. GAS FLOW RATE:		SCFM	7. GAS FLOW RATE:			SCFM
6. EFFICIENCY OF ELECTRICAL PRECIPI	TATOR (SEE IN	STRUCTION 4):	8. EFFICIENCY OF ELEC	CTRICAL PRE	CIPITATOR (SEE INST	TRUCTION 4): %
SUBMIT THE MANUFACTURER'S SPECIFICATIONS FOR THE ELECTRICAL PRECIPITATOR: REFERENCE THE INFORMATION					INFORMATION TO T	
* ELECTRICAL PRECIPITATORS VARY GREATLY IN THEIR DESIGN AND IN THEIR COMPLEXITY. THE ITEMS IN THIS SECTION PROVIDE A MINIMUM AMOUNT OF INFORMATION. THE APPLICANT MUST, HOWEVER, SUBMIT WITH THIS APPLICATION THE MANUFACTURER'S SPECIFICATIONS, INCLUDING ANY DRAWINGS, TECHNICAL DOCUMENTS, ETC. IF THE INFORMATION PROVIDED BY THE MANUFACTURER'S SPECIFICATIONS IS INSUFFICIENT FOR FULL AND ACCURATE ANALYSIS, THE AGENCY WILL REQUEST SPECIFIC ADDITIONAL INFORMATION.						
		FILȚER UNIT - No	ot Applicable			
1. FLOW DIAGRAM DESIGNATION(S) OF	FILTER UNIT:					
2. MANUFACTURER:			3. MODEL NAME AND	NUMBER:		-
4. FILTERING MATERIAL:			5. FILTERING AREA:			·
6. CLEANING METHOD: SHAKER REVERSE AIR PULSE AIR PULSE JET OTHER: SPECIFY						
7. GAS COOLING METHOD: 0 DUCTWOR BLEED-IN AIR WATER SPRA	K: LENGTH Y OTHER: S	FT., DIAM PECIFY	IN.			
AVERAGE OPERATIO	N OF SOURCE		MA	XIMUM OPER	ATION OF SOURCE	
8. GAS FLOW RATE (FROM SOURCE):		SCFM	12. GAS FLOW RATE (F	ROM SOURCE	E):	. SCFM
9. GAS COOLING FLOW RATE: BLEED-IN AIRSCFM, WA	TER SPRAY	GPM	13. GAS COOLING FLOW		WATER SPRAY	GPM
10. INLET GAS CONDITION: TEMPERATURE°F, DEWPOIN	г°F		14. INLET GAS CONDIT. TEMPERATURE		OINT°F	
11. EFFICIENCY OF FILTER UNIT (SEE IN	STRUCTION 4)	%	15. EFFICIENCY OF FILT	TER UNIT (SEE	E INSTRUCTION 4):	%

SCRUBBER						
FLOW DIAGRAM DESIGNATION(S) OF SCRUBBER: Pickling Line Wet Scrubber						
2. MANUFACTURER: PRO-ECO 3. MODEL NAME AND NUMBER:						
4. TYPE OF SCRUBBER: HIGH ENERGY: GAS STREAM PRESSURE DROPINCH H ₂ 0 PACKED: PACKING TYPE, PACKING SIZE, PACKED HEIGHTIN. SPRAY: NUMBER OF NOZZLES, NOZZLE PRESSURE PSIG OTHER: SPECIFY _ 4 Sieve Tray - ATTACH DESCRIPTION AND SKETCH WITH DIMENSIONS						
5. TYPE OF FLOW: SOUNTERCURRENT CROSSFLOW CONCURRENT COUNTERCURRENT						
6. SCRUBBER GEOMETRY: LENGTH IN DIRECTION OF GA 7. CHEMICAL COMPOSITION OF SC						
			Outy FRP	IMUM OPERATION OF SOURCE		
AVERAGE OPE 8. SCRUBBANT FLOW RATE:	ERATION OF SOUR		12. SCRUBBANT FLOW F		GPM	
9. GAS FLOW RATE:	6,446	GPM SCFM	13. GAS FLOW RATE:	6,526	SCFM	
10. INLET GAS TEMPERATURE:	123	°F	14. INLET GAS TEMPERA	TURE: 125	°F	
11. EFFICIENCY OF SCRUBBER (SI 99.90 % PARTICULATE	EE INSTRUCTION A 99.90 % GASE	4): OUS	15. EFFICIENCY OF SCRU 99.90 % PARTICUL	JBBER (SEE INSTRUCTION 4): .ATE <u>99.90 %</u> GASEOUS	S	
				Li		
			QUIPMENT - Not Applica	ible ,		
1. FLOW DIAGRAM DESIGNATION	I(S) OF "OTHER TY		PMENT:	The state of the s) F.D.	
2. GENERIC NAME OF "OTHER" EC		3. MANUFACTURER:	·	4. MODEL NAME AND NUMB	JER:	
5. DESCRIPTION AND SKETCH, W	ITH DIMENSIONS	AND FLOW RATES, OF "	OTHER" EQUIPMENT:			
	`					
				,		
			•			
				. , ,		
			1	KIMUM OPERATION OF SOURC	E	
	PERATION OF SOL	IRCE	8. FLOW RATES:	ZINION OF ENVITOR OF BOOKE		
6. FLOW RATES: GPM SCFM			GPM	_ SCFM		
7. EFFICIENCY OF "OTHER" EQU	IPMENT (SEE INST	RUCTION 4): %	9. EFFICIENCY OF "OTH	ER" EQUIPMENT (SEE INSTRUC	CTION 4): %	
IL						

EMISSION INFORMATION					
51. NUMBER OF IDENTICAL CONTROL UNITS OR CONTROL SYSTEMS (DESCRIBE AS REQUIRED):					
		AVERAG	E OPERATIO	ON OF SOUR	ICE
CONTAMINANT	CONCENTRATION OR EMISSION F UNIT OR CONT			CONTROL	METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	2a. GR/SC	b.		LB/HR	C.
CARBON MONOXIDE	3a. PPM (VOI	b.		LB/HR	C
NITROGEN OXIDES	4a. PPM (VOI	b.		LB/HR	C
ORGANIC MATERIAL	5a PPM (VOI	b.	*	LB/HR	c.
SULFUR DIOXIDE	6a. PPM (VOI	b.		LB/HR	c.
OTHER (SPECIFY) HCL	7a. PPM (VOI	b.	0.229	LB/HR	c. Stack Test Data
		MAXIMU	M OPERATIO	ON OF SOUR	ICE .
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM				METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	8a. GR/SC	b.		LB/HR	с.
CARBON MONOXIDE	9a. PPM (VOI	ъ.		LB/HR	c.
NITROGEN OXIDES	10a. PPM (VOI	ъ.		L:B/HR	c.
ORGANIC MATERIAL	lla PPM (VOI	b.		LB/HR	C
SULFUR DIOXIDE	12a. PPM (VOI	b.		LB/HR	C
OTHER (SPECIFY) HCL	13a. PPM (VOI	b.	0.41	LB/HR	c. Emission Factor/Flow Measurements

**"OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

EXHAUST POINT INFORMATION				
1. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST	POINT: Pickle Line S	crubber		
2. DESCRIPTION OF EXHAUST POINT (LOCATION I	N RELATION TO BUILDING Vertical S			
3. EXIT HEIGHT ABOVE GRADE: 70 FT		4. EXIT DIAMETER: 1.25		
5. GREATEST HEIGHT OF NEARBY BUILDINGS: 42	FT	6. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: 250	FT	
AVERAGE OPERATION OF SOU	JRCE	MAXIMUM OPERATION OF SOURCE		
7. EXIT GAS TEMPERATURE: 123	·°F	9. EXIT GAS TEMPERATURE 125	°F	
8. GAS FLOW RATE THROUGH EACH EXIT: 5,540	ACFM	10. GAS FLOW RATE THROUGH EACH EXIT: 5,710	ACFM	

HCL Pickling Line Emission Calculations NACME Steel Processing 429 West 127th Street Chicago, Illinois

Maximum Operation Rate

Current Permitted Emission Factor (Scrubber Control) = 4.8 lbs HCL/1000 tons Steel Processed Testing w/ Scrubber Control)
Proposed Annual Steel Throughput = 750,000 tons/year

Emission Calculation

4.8 lbs HCl/ton Steel Processed X 750,000 tons steel/year = 3,600 lbs HCl Emitted/Year HCL tons/yr = 3,600 lbs HCl/Year X 1 ton/2,000 lbs = 1.8 tons HCl/year

HCI lbs/hour = (3,600 lbs/year)/8,760 hours/year = 0.41 lbs HCI/hour

Actual Tested Operation Rate

HCL Emission Rate per 2002 Stack Test Data = 0.229 lbs/hour

Test Rate Production = 200 tons steel / 3 hours = 67 tons steel/hour

HCL Emitted per Ton Steel = (0.229 lbs/hr) / (67 tons steel/hr) = 0.0034 lbs HCl emitted/ton steel

Emission Calculation

Project No.: M046005

0.0034 lb HCI/ton steel * (750,000 tons steel/yr) = 2,550 lbs HCI/yr or 1.275 tons/yr

* Average throughput based on 2003 and 2004 thruputs

NMLP 0952

NACME Steel Processing

Actual Emissions With Control

HCI Emission Rate per 2002 Stack Test Data = 0.229 lbs/hr
Test Rate Production = 200 tons steel / 3 hours = 67 tons steel/hr
0.229 lbs/hr / 67 tons steel = 0.0034 lbs HCI emitted/ton steel
0.0034 lb HCL/ton steel * 1000 lbs/steel = 3.4 lb/1000 lb steel
0.0034 lbs HCL/ton steel * 750,000 tons steel/yr / 2000 lbs/ton = 1.28 tons HCI/yr

Potential To Emit With Control

Permited Emission Factor = 4.8 lbs/1000 tons steel
Production = 750,000 tons
Potential to emit = (4.8 lb / 1000 tons) * 750,000 tons/yr * (1/2000 lbs/ton) = 1.8 tons/yr

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 13 - 12) (Enforcement – Air)
NACME STEEL PROCESSING, LLC,) (Emorecinent – An)
a Delaware limited liability corporation,)
Respondent.))

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 7
APRIL 13, 2005 NOTICE OF
INCOMPLETENESS ("APRIL 2005
NOTICE OF INCOMPLETENESS")

217/782-2113 CERTIFIED MAIL

NOTICE OF INCOMPLETENESS

April 13, 2005

NACME Steel Processing, LLC Attn: John Dubrock 429 West 127th Street Chicago, Illinois 60628

<u>Application No.:</u> 96020074 <u>I.D. No.</u>: 031600FWL

Applicant's Designation:

Date Received: April 4, 2005

Operation of: Steel Pickling Plant

Location: 429 West 127th Street, Chicago

Illinois EPA has determined the above referenced operating permit application(s) to be incomplete because information was not provided as required by the 35 Ill. Adm. Code 201.157.

Specifically, the following information must be supplied in order for the application to be considered complete:

- 1. Updated information on production rate and emissions based on the most recent stack test (April 16, 2002) data.
- 2. Detailed calculations of the plant-wide actual emission and potential to emit (PTE) of hazardous air pollutant (HAP), hydrogen chloride. PTE shall be calculated based on the maximum rated production capacity and year round operations. The credits for the control device efficiency may be taken only to the extent required by applicable environmental regulations.

If emission calculations demonstrate that actual or potential emission of HAP exceeds major source threshold levels of 10 tons/year for a single HAP the Permittee shall apply for Clean Air Act Permit Program (CAAPP) permit. To avoid the CAAPP permitting requirements, you may want to consider applying for a Federally Enforceable State Operating Permit (FESOP). A FESOP is an operating permit that contains federally enforceable limits in the form of permit conditions which effectively restrict the potential emissions of a source to below major source threshold, thereby excluding the source from the Clean Air Act Permit Program (CAAPP).

The Illinois EPA will be pleased to review a reapplication for this permit that includes the information and documentation necessary to correct the deficiencies noted above. In accordance with 35 Ill. Adm. Code 201.157, this reapplication may incorporate by reference the data and information submitted to the Illinois EPA in the original permit application, provided that you certify that the data and information previously submitted remains true, correct, and current. The reapplication will be considered filed on the date it is received by the Illinois EPA and will constitute a new permit application for purposes of Section 39(a) of the Act. Two copies of this information must be submitted and should reference the application and I.D. numbers assigned above.

Page 2

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

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

DES:VJB:jar

cc: Region 1

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
Complainant,)	
· v .)	PCB No. 13 - 12
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,)	(Enforcement – Air)
Respondent.)	

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 5 MAY 16, 2002 PERMIT DENIAL ("2002 OPERATIONAL PERMIT DENIAL")

PERMIT DENIAL

May 16, 2002

NACME Steel Processing, LLC

Chicago, Illinois 60628

Attn: Tom Beach 429 West 127th Street

Application No.: 96020074

I.D. No.: 031600FWL
Applicant's Designation: PICKLING

Date Received: April 12, 2002

Operation of: Steel Pickling Line

Location: 429 West 127th Street, Chicago, 60628

The Illinois EPA has reviewed your Application for Operating Permit for the above referenced project. The permit application is DENIED because Sections 9 and 39.5 of the Illinois Environmental Protection Act and 35 Ill. Adm. Code, Section 201.160 might be violated.

The following are specific reasons why the Act and the Rules and Regulations may not be met:

1. This application covers equipment for which the Illinois EPA previously granted a construction permit 01040081. This permit included a condition that an emission test be performed by an approved testing service. This test has not been performed, therefore, an operating permit may not be granted pursuant to 35 Ill. Adm. Code 201.160(b)(2) and (3).

The Illinois EPA will be pleased to review a reapplication for this permit that includes the necessary information and documentation to correct the deficiencies noted above. In accordance with 35 Ill. Adm. Code 201.157, this reapplication may incorporate by reference the data and information submitted to the Illinois EPA in the original permit application, provided that you certify that the data and information previously submitted remains true, correct and current. The reapplication will be considered filed on the date it is received by the Illinois EPA and will constitute a new permit application for purposes of Section 39(a) of the Act. Two copies of this information must be submitted and should reference the application and I. D. numbers assigned above.

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

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

DES: VJB

cc: Region 1

Bob Sharpe, Enforcement

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 13 - 12) (Enforcement – Air)
NACME STEEL PROCESSING, LLC,)
a Delaware limited liability corporation,)
Respondent.) ·

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 6
MARCH 30, 2005 APPLICATION FOR
RENEWAL OF FEDERALLY
ENFORCEABLE STATE OPERATING
PERMIT SUBMITTED BY NACME
("APRIL 2005 SOP RENEWAL")



NATIONAL PROCESSING COMPANY

Division of National Material L.P.

429 W. 127th Street Chicago, Illinois 60628 Phone: 773-468-2800 • Fax: 773-468-2868

March 23, 2005

Mr. Donald E. Sutton, P.E.
Manager, Permit Section
Illinois Environmental Protection Agency
Bureau of Air
1021 North Grand Avenue East
Springfield, Illinois 62702

Dear Mr. Sutton:

Enclosed please find two copies of the completed Illinois Environmental Protection Agency APC Form 205A application for Operating Permit renewal, prepared for the NACME Steel Processing, LLC facility (ID No. (31600FWL) located at 429 West 127th Street in Chicago, Illinois.

Should you have any question concerning this submittal, please contact Ms. Karyn Schoch, MOSTARDI PLATT ENVIRONMENTAL, at 630-993-2680.

Sincerely,

NACME STEEL PROCESSING, LLC

John Dubrock

Director of Operations

Enclosures

RECEIVED

APR 0 4 2005

IEPA - DAPC - SPFLD



STATE-OF ILLINOIS" ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL PERMIT SECTION P. O. BOX 18508

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

P. O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

				100 000	9 7233	
	APPLICATION FOR <u>RENEWAL</u> O STATE OPERATIN	OF A FEDERALLY ENFORCES G PERMIT (FESOP)	NBLE	I.D. NO. PERMIT NO	03160	00 FWL 20074
OPE	ERATION OF:	PICKLING	(A)	DATE		4-05
1 e .	NAME OF OWNER:		2a. NAME C	F OPERATOR		
1b.	STREET ADDRESS OF OWNER: 1985 Pratt Boulevard		2b. STREE	ADDRESS C	F OPERATOR:	
1c,	CITY OF OWNER; Elk Grove Village	·	2c. CITY OF Chicago	OPERATOR		
1d.	STATE OF OWNER:	1e. ZIP CODE: 69007	2d. STATE (OF OPERATO	R: .	26. ZIP CODE: 60628
			·			
3a.	NAME OF CORPORATE DIVISION OR NACME Steel Processing, LLC.	•	429 West	127 th Street	F EMISSION SOURC	
3c.	CITY OF EMISSION SOURCE: Chicago	3d. LOCATED WITHIN CITY LIMITS: ☑ YES ☐ NO	3e. TOWNS	HIP:	3f. COUNTY: Cook	3g. ZIP CODE; 60628
4.	ALL CORRESPONDENCE TO: (TITLE: Mr. John Dubrock		5. TELEPH 219-391-		R FOR AGENCY TO	CALL:
6.	ADDRESS FOR CORRESPONDENCE	(CHECK ONLY ONE)	OWNER	OPERAT	OR EMISSION	SOURCE
					-	
7.	THE UNDERSIGNED HEREBY MAKES TRUE AND CORRECT, AND FURTHES APPLICATION REMAINS TRUE, CORS AUTHORIZED TO EXECUTE THIS APPLICATION AUTHORIZED SIGNATURE(S):(8)	RECT AND CURRENT. BY AFFIXI				
	BY OLDS	3/30/65 DATE	BY SIC	NATURE		DATE
	John Dubrock TYPED OR PRINTED NAME OF S	GNER	TY	PED OR PRINT	ED NAME OF SIGNER	
	Director of Operations TITLE OF SIGNER		тп	LE OF SIGNER		
(A)	THIS FORM IS TO PROVIDE THE ILLI	NOIS EPA WITH GENERAL INFO	RMATION ABO	OUT THE EQU	IPMENT TO BE OPER	RATED.
(B)	THIS APPLICATION MUST BE SIGNE AND SUPPLEMENTS THERETO SHAI CONTROL EQUIPMENT, OR THEIR A APPLICATION."	L BE SIGNED BY THE OWNER A LITHORIZED AGENT, AND SHALL	BE ACCOMP	ANIED BY EVI	DENCE OF AUTHOR	ITY TO SIGN THE
	IF THE OWNER OR OPERATOR IS A COPY OF A RESOLUTION OF THE C CAUSE OR ALLOW THE CONSTRUC	TODODATION'S HOARD OF DIRE	GIURSAUIN	UKIZING INC	LEVOCKO SIGIKIKA	EPA A CERTIFIED THIS APPLICATION TO

			u			
	SITE FEE E	3ILLI	NG INFORMATION	10.	Karyn Schoch	
9a.	COMPANY NAME: NACME Steel Proces		ш с.	11.	630-993-2680	
9b.	STREET ADDRESS 429 West 127 th Stree			12.	CONTACT PERSON'S FACSIMILE NUMBER: 630-983-9017	
Øc.	CITY Chicago	***************************************		13.	3. FEDERAL EMPLOYER IDENTIFICATION NUMBER (FEIN): 38-4035553	
9di.	STATE:	9f.	BILLING CONTACT PERSON: BIII Reichle	14.	PRIMARY STANDARD INDUSTRIAL CLSSSIFICATION (SIC) CATEGORY Cold-Rolled Steel Sheet, Strip, and Bars	
9 a .	ZIP CODE: 60628	9g.	CONTACT TELEPHONE NO. 773-291-1301	15.	PRIMARY SIC NUMBER: 16. TAXPAYER IDENTIFICATION NUMBER (TIN): 3316	

17a. I.D. NO. 🕦 3 1 8 0 0 F W L
17b. HAS THE OPERATION AS DESCRIBED IN THE FESOP APPLICATION BEEN MODIFIED* AS DEFINED IN 35 ILL. ADM. CODE 201.102? ☐ YES ☑ NO IF "YES", SUBMIT THE APPLICABLE FORM(S) AND UPDATED FLOW DIAGRAM(S).
17c. DATE THE OPERATION WAS MODIFIED:

MODIFICATION: ANY PHYSICAL CHANGE IN, OR CHANGE IN THE METHOD OF OPERATIONS OF, AN EMISSION SOURCE OR OF AIR POLLUTION CONTROL EQUIPMENT WHICH INCREASES THE AMOUNT OF ANY SPECIFIED AIR CONTAMINANT EMITTED BY SUCH SOURCE OR EQUIPMENT OR WHICH RESULTS IN THE EMISSION OF ANY SPECIFIED AIR CONTAMINANT NOT PREVIOUSLY EMITTED. IT SHALL BE PRESUMED THAT AN INCREASE IN THE USE OF RAW MATERIALS, THE TIME OF OPERATION, OR THE RATE OF PRODUCTION WILL CHANGE THE AMOUNT OF ANY SPECIFIED AIR CONTAMINANT EMITTED. NOT WITHSTANDING ANY OTHER PROVISIONS OF THIS DEFINITION, FOR PURPOSES OF PERMITS ISSUED PURSUANT TO SUBPART D, THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MAY SPECIFY CONDITIONS UNDER WHICH AN EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT MAY BE OPERATED WITHOUT CAUSING A MODIFICATION AS HEREIN DEFINED, AND NORMAL CYCLICAL VARIATIONS, BEFORE THE DATE OPERATING PERMITS ARE REQUIRED, SHALL NOT BE CONSIDERED MODIFICATIONS 35 ILL. ADM. CODE 201.102.

IEPA FOIA 0397

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 13 - 12 (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,)
Respondent.	,)

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 11
DECEMBER 6, 2005, CAAPP
APPLICATION COMPLETENESS
DETERMINATION OF SOURCE FEE
DETERMINATION FOR NACME'S 2005
FESOP APPLICATION ("2005 CAAPP
APPLICATION COMPLETION
DETERMINATION")

	9b) LIST THE EMISSION UNITS THAT WE PERIOD, AND THE REASON(S) FOR NO AS EXHIBIT 296-2.):	RE NOT IN CONT INCOMPLIANCE (INUOUS COMPLIANCE SINCE THE LAST REPORTING (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL
	EMISSION UNIT		REASON(S) FOR NONCOMPLIANCE
	N/A	01-	
		<u> </u>	
40)	SUMMARY OF METHODS USED TO DET		INFORMATION
10)			
a)	DESCRIPTION OF TESTING METHOD: NEEDED, ATTACH AND LABEL AS EXHI EPA Emission Testing Methods 1-4,	BIT 296-3.):	ONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS leted in April 2002.
10b E	O DESCRIPTION OF MONITORING PROC	EDURES USED T	O DEMONSTRATE COMPLIANCE, INCLUDING ANY IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL
	N/A		
	DESCRIPTION OF RECORDKEEPING US ATTACH AND LABEL AS EXHIBIT 296-5.		TRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED,
	Emission Test Report, steel through		
10d) DESCRIPTION OF REPORTING USED 1 ATTACH AND LABEL AS EXHIBIT 296-6.)	O DEMONSTRAT	TE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED,
Á	Annual Emission Reporting/Emissio	л Test Report S	Submittal.
		SIGNATUR	E BLOCK
TON	E: THIS CERTIFICATION MUST BE SIGNED BY WILL BE RETURNED AS INCOMPLETE.	'A RESPONSIBLE C	OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION
-	CERTIEV LINDER PENALTY OF LAW TH	IAT, BASED ON II RMATION CONTA	NFORMATION AND BELIEF FORMED AFTER REASONABLE NINED IN THIS APPLICATION ARE TRUE, ACCURATE AND
	AUTHORIZED SIGNATURE:	*	
	BY:		Production Manager
	AUTHORIZED SIGNA	TURE	TITLE OF SIGNATORY
	William Reich	ə <i>l</i>	, ,
	TYPED OR PRINTED NAME O	F SIGNATORY	DATE

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\$1.00 \$1.00

APPLICATION PAGE 9-3
Printed on Recycled Paper 296-CAAPP

EMISS	ION UNITS COMPLIANCE INFOR	MATION
STANDARDS, EMISSION CONTROL	ARE IN COMPLIANCE WITH APPLICABL REQUIREMENTS, EMISSION TESTING, FORING, BASED ON THE COMPLIANCE TTACH AND LABEL AS EXHIBIT 296-1):	COURT REQUIREMENTS, WORK
EMISSION UNIT	APPLICABLE RULE	COMPLIANCE DETERMINATION METHOD
Steel Pickling Line	40 CFR 63, Subpart CCC	Emission Testing
HCI AST	40 CFR 63, Subpart CCC	Records maintenance
		·
	:	

E CO



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE
Revision #:
Date: / /
Page of
Source Designation:

	TAR ACENCY US	E ONLY
	FOR AGENCY US	
	ID NUMBER:	
	PERMIT #:	
COMPLIANCE CERTIFICATION	1	1
	DATE:	
AN APPLICATION FOR A CAAPP PERMIT MUST CONTAIN A CERTIF	ICATION OF COMPLIANCE SIGNED BY A R	ESPONSIBLE OFFICIAL. THIS
AN APPLICATION FOR A CAAPP PERMIT MUST CONTAIN A CERTIF FORM MUST BE SUBMITTED WITH THE ORIGINAL CAAPP PERMIT	APPLICATION AND UPDATED ON AN ANNU	JAL BASIS.
and the state of t		
SOURCE II	NFORMATION	
1) SOURCE NAME:		
1) SOURCE WAINE.		
NACME Steel Processing		
2) DATE FORM 3) SOURCE ID NO.	Į.
PREPARED:	(IF KNOWN): 031600FWL	
10/3/05	U31000FWL	
4) CAAPP PERMIT NUMBER (IF KNOWN):		
N/A - No CAAPP Permit		
5) IS THIS THE FIRST SUBMITTAL OF THIS FORM?		YES NO
I '		
IF NO, WHAT IS THE REPORTING PERIOD	/ TO: / /	
COVERED BY THIS FORM?		
SOURCE COMPLI	IANCE INFORMATION	
6) DOES THE SIGNATORY OF THIS FORM HEREBY CERT	TFY THAT THE SOURCE IS IN COMPL	JANCE WITH ALL
APPLICABLE REQUIREMENTS?	15	- 7
APPLICABLE REGUINEMENTO		X YES NO
IF NO, EXPLAIN:		
	TO MICHIEL	UE DEBMIT TERM E G
7) PROVIDE THE SCHEDULE FOR SUBMISSION OF COM	PLIANCE CERTIFICATION DURING IT	NO LESS EREOLIENTLY
7) PROVIDE THE SCHEDULE FOR SUBMISSION OF COM ONCE ANNUALLY IN JANUARY (NOTE THAT SUCH CEI	RTIFICATION MUST BE SUBMITTED I	NO LESS I REGISTRE
THAN ANNUALLY):		
N/A		
8) INDICATE THE COMPLIANCE STATUS OF THE SOURCE	F WITH ANY APPLICABLE ENHANCE	D MONITORING AND
B) INDICATE THE COMPLIANCE STATUS OF THE SOURCE COMPLIANCE CERTIFICATION REQUIREMENTS OF THE COMPLIANCE WITH COMPLIANCE	TE CLEAN AIR ACT, E.G., NO ENHAN	CED MONITORING
COMPLIANCE CERTIFICATION REQUIREMENTS OF TR REQUIRED AND IN COMPLIANCE WITH COMPLIANCE	CERTIFICATION REQUIREMENTS:	
REQUIRED AND IN COMIL BANGE WITH THE		on roquiroments
No Enhanced Monitoring required and in compli	iance with compliance certification	лі геципететы.
NO Limitances months and 1-4-		

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1038.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE 9-1

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EMISSION	UNITS COMPLIANCE INFORMATION	,
7) EMISSION UNITS IN COMPLIANCE	IN COMPLIANCE WITH ALL APPLICABLE REQUIP QUIREMENTS DURING THE PERMIT TERM. IF A	REMENTS AND WILL DDITIONAL SPACE IS
DESIGNATION ID NUMBER	EMISSION UNIT	
Steel Pickling Line 1	Steel Pickling Line	
HCL ASTs 1 and 2	HCI ASTs	
DECLUDE VENTO MULL ACCUSEVE ON A TI	COMPLIANCE DATES CH ARE CURRENTLY IN COMPLIANCE WITH ALL MELY BASIS, AND MAINTAIN COMPLIANCE WITH DURING THE PERMIT TERM. IF ADDITIONAL SP.	M, FUIURE CUMPLIANCE
DESIGNATION ID NUMBER	EMISSION UNIT	(MONTH/DAY/YEAR)
N/A		
THE FOLLOWING EMISSION UNITS ARE TIME OF PERMIT APPLICATION. HOWE	- COMPLIANCE TO BE ACHIEVED PRIOR TO PE NOT IN COMPLIANCE WITH ALL APPLICABLE F VER, THESE EMISSION UNITS WILL ACHIEVE C O PERMIT ISSUANCE AND WILL CONTINUE TO TERM. IF ADDITIONAL SPACE IS NEEDED, ATTA	OMPLIANCE WITH ALL COMPLY WITH SUCH
DESIGNATION ID NUMBER	EMISSION UNIT	(MONTH/DAY/YEAR)
N/A		
b) THE FOLLOWING IS A NARRATIVE DESC FOR EACH OF THE EMISSION UNITS LI LABEL AS EXHIBIT 293-4:	CRIPTION OF THE MEANS BY WHICH COMPLIAN STED IN 9a) ABOVE. IF ADDITIONAL SPACE IS I	NCE WILL BE ACHIEVED NEEDED, ATTACH AND
Not Applicable		
THE FOLLOWING EMISSION UNITS WIL THE TIME OF PERMIT ISSUANCE. A FO ADDENDUM FOR NON COMPLYING EM	- COMPLIANCE WILL NOT BE ACHIEVED PRIOR L NOT BE IN COMPLIANCE WITH ALL APPLICAB DRM 294-CAAPP, "COMPLIANCE PLAN/SCHEDUL ISSION UNITS," MUST BE SUBMITTED FOR EMIS REQUIREMENTS AT THE TIME OF PERMIT ISSUA EMISSION UNITS. IF ADDITIONAL SPACE IS NEE	E OF COMPLIANCE - SSION UNITS NOT IN NCE, A FORM 294-CAAPP
		DATE COMPLIANCE SCHEDULED TO BE ACHIEVED
DESIGNATION ID NUMBER	EMISSION UNIT	(MONTH/DAY/YEAR)
N/A		

APPLICATION PAGE 8-2
Printed on Recycled Paper
293-CAAPP



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE
Revision#:
Date: / /
Page of
Source Designation:

COMPLIANCE PLAN/ SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT

FOR AGENCY USE ONLY	4
ID NUMBER:	
PERMIT #:	
DATE:	

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT THE APPLICANT SUBMIT A COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR ALL EMISSION UNITS AT THE CAAPP SOURCE, REGARDLESS OF THE COMPLIANCE STATUS OF EACH INDIVIDUAL EMISSION UNIT. THIS FORM REQUIRES THAT THE COMPLIANCE STATUS BE STATED FOR EACH EMISSION UNIT. APPLICATION FORM 294-CAAPP, "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE - ADDENDUM FOR NON COMPLYING EMISSION UNITS," MUST BE SUBMITTED FOR EACH EMISSION UNIT NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF SUBMITTAL.

30DIVIT LED : D. T.		
	SOURCE INFORMATION	
	SOURCE INFORMATION	
1) SOURCE NAME:		
NACME Steel Processing 2) DATE FORM PREPARED: 10/03/05	3) SOURCE ID NO. (IF KNOWN): 031600FWL	
	T. INTORUM TION	
SOUR	CE COMPLIANCE INFORMATION	-
4) DESCRIBE THE COMPLIANCE STATUS (IS IN COMPLIANCE WITH ALL APPLICABLE)	OF THE SOURCE WITH ALL APPLICABLE REQUIREMENTS (E.G., SOURCE	

300 KCE OSMI EMITH ALL	APPLICABLE REQUI	REMENTS (E.G., "S	OURCE
4) DESCRIBE THE COMPLIANCE STATUS OF THE SOURCE WITH ALL IS IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS"):			
IS IN COMPLIANCE WITH ALL APPLICABLE TO SEE THE SECOND SEC			
Source is in compliance with applicable requirements.			
5) IF IN COMPLIANCE, WILL THE SOURCE CONTINUE TO COMPLY W	ITH ALL APPLICABLE	REQUIREMENTS? YES	NO
IF NO, EXPLAIN:			
	LUBERTER TO WILICH	RECOME EFFECTIVE	/E
6) WILL THE SOURCE MEET, ON A TIMELY BASIS, APPLICABLE REQ	UIKEMEN 12 MUICH	DECOME EN EST	-
DURING THE PERMIT TERM?		YES	NO
IF NO, EXPLAIN		. · · · ·	,
·			

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE 8-1

Printed on Recycled Paper 293-CAAPP

	iii) EXPLAIN THE MEANS BY	MUICUTUE AMOUN	IT OF YOM OOL SOTED	ID MEASURED OF DE	YEDNANED.
	III) EXPLAIN THE WEARS BY	WHICH THE AMOUN	IT OF YOM COLLECTED	19 MEASURED OR DE	TERMINED:
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1					
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l					
	•				
					*
L					
			ITIVE CONTROL		
	COMPLETE THE FOLLOWING CONTROL MEASURE UTILIZE		MINIMUM AND TYPICAL R	REDUCTION EFFICIENC	CY FOR EACH
	CONTROL MEASURE UTILIZA				
					FREQUENCY OF
			FUGITIVE	REDUCTION	CONTROL
	CONTROL MEASURES	REGULATED AIR POLLUTANT	POINT(S) CONTROLLED	EFF.(%) MIN TYP	APPLICATION
	CONTROL MEAGORES	FOLLOTARI	CONTROLLED	AINA LAL	AFFEIGATION
a)					
L	Clean Paved Roads	PM			Routine
b)					
c)					
d)					
e)					
6)					
,	***************************************	<u> </u>	J	L	
NOT	E: IF ADDITIONAL SPACE IS	NEEDED, ATTACH	AND LABEL AS 391-8.		
27) [PROVIDE A DESCRIPTION OF	- FACIL OF THE COL	TOOL MEACHINE INDIC	ATED IN TEM TO JE J	DDITIONAL COACE
	S NEEDED, ATTACH AND LA		I RUL MEASURES INDIC	AIEU IN HEM 32. IF A	ADDITIONAL SPACE
				D TO ODIOTION	
a) [CONTROL MEASU			DESCRIPTION	
-,	Visual Inspection of Roa Condition		inspect paved	areas for condition, required.	repair, as
- 1	oondibon.			required.	
ſ					
_					
b) [·	
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1		accompany to the contract of t			
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APPLICATION PAGE 7-10

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	FUGITIVE VOM FRO	И CLEANUP OF	ERATIONS (cor	nplete if applicabl	le) – N/A				
23)	23) COMPLETE THE FOLLOWING FOR EACH VOM CONTAINING MATERIAL USED FOR CLEANUP FOR WHICH THE EMISSIONS ARE FUGITIVE AND HAVE NOT BEEN ACCOUNTED FOR ELSEWHERE IN THIS APPLICATION:								
1	EMISSIONS ARE FUGITIVE AND H	AAF NOT BEEN AC	COUNTED FOR EL	ANNUA	L USAGE				
	GENERIC NAME OF CLEANUP	DENSITY	VOM CONTENT	(GAL	YEAR)				
Ι.	MATERIAL	(LB/GAL)	(WEIGHT %)	MAX	TYPICAL				
a)									
b)									
"									
1 _ f									
C)									
L		L		J L	<u> </u>				
	EXPLAIN THE MEANS BY WHICH T	HESE MATERIALS	ARE USED AND W	HAT EQUIPMENT OR I	TEMS ARE BEING				
 	CLEANED:								
25a)	ARE ALL VOM USED IN CLEANUP	OPERATIONS CO	NSIDERED TO BE E	MITTED?	T TT				
				L.	YES NO				
	IF NO, EXPLAIN:			,					
b)	IF APPLICABLE, COMPLETE ITEM	S I, II, AND III BELO	W:						
	i) PROVIDE THE MAXIMUM AND HENCE, NOT EMITTED:			D AND/OR SHIPPED C	OFF-SITE AND				
	(GALSYR			(TONS/YR)					
M		<i></i>		(TORIOTTI)					
T۱	/P								
li	EXPLAIN THE MEANS BY WHICH	VOM IS COLLECT	ED FOR RECLAMAT	TON AND/OR DISPOS	AL:				
••,	y	· · · · · · · · · · · · · · · · · · ·							
	•								

c) IS USEPA METHOD 9 USED TO READ ALL VISIBLE EMISSIONS?		XINO
IF NO, EXPLAIN AND SPECIFY THE METHOD USED:	YES	∑7 NO
Paved Road – Insignificant fugitive PM emissions		
19) IS AN OPERATING PROGRAM FOR FUGITIVE PARTICULATE MATTER AND/OR PM10 CONTROL REQUIRED PURSUANT TO 35 ILL. ADM. CODE 212.309?		
GOTTINGE TELEGINES / G. TOST WAY TO SEE THE SECOND OF THE	YES	NO
IF YES, HAS SUCH A PROGRAM PREVIOUSLY BEEN SUBMITTED TO THE AGENCY?	YES	NO
IF SUCH A PROGRAM HAS NOT BEEN SUBMITTED, IT SHOULD BE ATTACHED TO THIS AND LABELED AS 391-5.	FORM UPON SI	JBMITTAL
20) IS THE SOURCE IN COMPLIANCE WITH 35 ILL. ADM. CODE 212.301 WHICH STATES THAT NO EMISSIONS SHALL BE VISIBLE BEYOND THE PROPERTY LINE OF THE	N/1	
SOURCE?	YES	NO
IF NO, EXPLAIN:		
	,	
FUGITIVE VOM FROM EQUIPMENT LEAKS (complete if applicable) – N	'A No VOM S	ources
FUGITIVE VOM FROM EQUIPMENT LEAKS (complete if applicable) – N/ 21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE I EQUIPMENT LEAKS:	'A No VOM S EMISSIONS OF	ources VOM FROM
21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE EQUIPMENT LEAKS:	'A No VOM S EMISSIONS OF RATE/SCREENII	VOM FROM
21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE I EQUIPMENT LEAKS: AVERAGE EMISSION LEAKING LEAK STRATIFIED LEAKING LEAK COLUMN COL	EMISSIONS OF	VOM FROM
21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE I EQUIPMENT LEAKS: AVERAGE LEAKING LEAK STRATIFIED LEAK STRATIFIED LEAK STRATIFIED LEAK STRATIFIED LEAK STRATIFIED LEAK STRATIFIED	EMISSIONS OF RATE/SCREENII	VOM FROM
21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE I EQUIPMENT LEAKS: AVERAGE EMISSION LEAKING LEAK STRATIFIED LEAKING LEAK COLUMN COL	EMISSIONS OF RATE/SCREENII	VOM FROM
21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE I EQUIPMENT LEAKS: AVERAGE LEAK/NO LEAK STRATIFIED LEAK FEMISSION EMISSION EMISSION FACTOR FACTOR	EMISSIONS OF RATE/SCREENII	VOM FROM
21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE I EQUIPMENT LEAKS: AVERAGE LEAK/NO LEAK STRATIFIED LEAK FOR EMISSION EMISSION EMISSION FACTOR FACTOR FACTOR OTHER; (SPECIFY): ATTACH A COPY OF THE FINAL REPORT FOR ANY OF THE ABOVE TESTS THAT HAVE	EMISSIONS OF RATE/SCREENII ORRELATION BEEN PERFORI	VOM FROM
21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE I EQUIPMENT LEAKS: AVERAGE LEAK/NO LEAK STRATIFIED LEAK FACTOR FACTOR FACTOR FACTOR OTHER; (SPECIFY): ATTACH A COPY OF THE FINAL REPORT FOR ANY OF THE ABOVE TESTS THAT HAVE REPORT SHOULD SUMMARIZE THE TEST PROCEDURES AND RESULTS. LABEL AS 39:	EMISSIONS OF RATE/SCREENII ORRELATION BEEN PERFORI	VOM FROM
21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE I EQUIPMENT LEAKS: AVERAGE LEAK/NO LEAK STRATIFIED LEAK FOR EMISSION EMISSION EMISSION FACTOR FACTOR FACTOR OTHER; (SPECIFY): ATTACH A COPY OF THE FINAL REPORT FOR ANY OF THE ABOVE TESTS THAT HAVE	EMISSIONS OF RATE/SCREENII ORRELATION BEEN PERFORI	NG VALUE
21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE I EQUIPMENT LEAKS: AVERAGE LEAK/NO LEAK STRATIFIED LEAK FOR EMISSION EMISSION FACTOR FACTOR FACTOR OTHER; (SPECIFY): ATTACH A COPY OF THE FINAL REPORT FOR ANY OF THE ABOVE TESTS THAT HAVE REPORT SHOULD SUMMARIZE THE TEST PROCEDURES AND RESULTS. LABEL AS 39-22) IS THERE AN ACTIVE INSPECTION AND MONITORING PROGRAM OF EQUIPMENT	EMISSIONS OF RATE/SCREENII ORRELATION BEEN PERFORI 1-6. YES	VOM FROM NG VALUE MED. THIS
21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE I EQUIPMENT LEAKS: AVERAGE LEAK/NO LEAK STRATIFIED LEAK FOR EMISSION EMISSION FACTOR FACTOR FACTOR OTHER; (SPECIFY): ATTACH A COPY OF THE FINAL REPORT FOR ANY OF THE ABOVE TESTS THAT HAVE REPORT SHOULD SUMMARIZE THE TEST PROCEDURES AND RESULTS. LABEL AS 39: 22) IS THERE AN ACTIVE INSPECTION AND MONITORING PROGRAM OF EQUIPMENT LEAKS? IF YES, PROVIDE A DESCRIPTION OF SUCH PROGRAM OR ATTACH THE INSPECTION FOR ANY OF THE ABOVE TESTS THAT HAVE REPORT SHOULD SUMMARIZE THE TEST PROCEDURES AND RESULTS. LABEL AS 39:	EMISSIONS OF RATE/SCREENII ORRELATION BEEN PERFORI 1-6. YES	VOM FROM NG VALUE MED. THIS
21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE I EQUIPMENT LEAKS: AVERAGE LEAK/NO LEAK STRATIFIED LEAK FOR EMISSION EMISSION FACTOR FACTOR FACTOR OTHER; (SPECIFY): ATTACH A COPY OF THE FINAL REPORT FOR ANY OF THE ABOVE TESTS THAT HAVE REPORT SHOULD SUMMARIZE THE TEST PROCEDURES AND RESULTS. LABEL AS 39: 22) IS THERE AN ACTIVE INSPECTION AND MONITORING PROGRAM OF EQUIPMENT LEAKS? IF YES, PROVIDE A DESCRIPTION OF SUCH PROGRAM OR ATTACH THE INSPECTION FOR ANY OF THE ABOVE TESTS THAT HAVE REPORT SHOULD SUMMARIZE THE TEST PROCEDURES AND RESULTS. LABEL AS 39:	EMISSIONS OF RATE/SCREENII ORRELATION BEEN PERFORI 1-6. YES	VOM FROM NG VALUE MED. THIS
21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE I EQUIPMENT LEAKS: AVERAGE LEAK/NO LEAK STRATIFIED LEAK FOR EMISSION EMISSION FACTOR FACTOR FACTOR OTHER; (SPECIFY): ATTACH A COPY OF THE FINAL REPORT FOR ANY OF THE ABOVE TESTS THAT HAVE REPORT SHOULD SUMMARIZE THE TEST PROCEDURES AND RESULTS. LABEL AS 39: 22) IS THERE AN ACTIVE INSPECTION AND MONITORING PROGRAM OF EQUIPMENT LEAKS? IF YES, PROVIDE A DESCRIPTION OF SUCH PROGRAM OR ATTACH THE INSPECTION FOR ANY OF THE ABOVE TESTS THAT HAVE REPORT SHOULD SUMMARIZE THE TEST PROCEDURES AND RESULTS. LABEL AS 39:	EMISSIONS OF RATE/SCREENII ORRELATION BEEN PERFORI 1-6. YES	VOM FROM NG VALUE MED. THIS

Ha Egg

e) IS EACH MONITOR BASIS?	R REVIEWED FO	R ACCURACY O	N AT LEA	ST A QUAR	TERLY	YES	NO
IF NO, EXPLAIN:							
N/A							
f) IS EACH MONITOR OCCUR?	R OPERATED AT	ALL TIMES THA	T FUGITI	VE EMISSIC	INS MAY	YES	NO
IF NO, EXPLAIN:							
N/A				,			
16) PROVIDE INFORM	ATION ON THE M	OST RECENT T	ESTS IF	ANY IN WE	ICH THE RESUL	TS ARE USED) FOR
PURPOSES OF TH DATE, TEST METH SUMMARY OF RES	E DETERMINATI	ON OF FEES, R ING COMPANY,	ULE APPL OPERAT	LICABILITY (OR COMPLIANCE TIONS EXISTING	. INCLUDE T DURING THE	HE TEST TEST AND A
FUGITIVE POINT(S)	TEST DATE	TEST METHOD	TEST	NG FIRM	OPERATING CONDITIONS		IARY OF BULTS
:							
			ļ				
	<u> </u>						
17) DESCRIBE ALL REP		REMENTS AND	PROVIDE	THE TITLE	AND FREQUENC	Y OF REPOR	RT
SUBMITTALS TO TE	HE AGENCY.						
FUGITIVE POINT(S)	REPORTING	REQUIREMENTS		TITI	E OF REPORT	FRE	QUENCY
Paved Road	Excessive fu	ıgitive emissic	ons		N/A		N/A
	FUG	SITIVE DUST	(comple	ete if app	licable)		
18a) ARE OPACITY REA						YES	No
IF YES, SPECIFY T	HE RELEVANT F	UGITIVE POINT	(S):			**************************************	
i)				T. I			
ii)					· · · · · · · · · · · · · · · · · · ·	***************************************	
iii)					····	***************************************	
b) SPECIFY THE FREC	QUENCY OF OPA	CITY READING	S:				

APPLICATION PAGE 7-7

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RECORDED PARAMET	FR INCLUDE THE METHOD OF	IDS WILL BE CREATED AND MAII RECORDKEEPING, TITLE OF PE ACT FOR REVIEW OF RECORDS	RSON RESPONSIBLE FOR
PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Paved area cleanup	Maintain records of cleaned	Maintenance Manager	Vice President - Supplies
			. ,
c) IS COMPLIANCE OF TH THE RECORDS?	E EMISSION UNIT READILY DE	MONSTRATED BY REVIEW OF	YES NO
IF NO, EXPLAIN:			
d) ARE ALL RECORDS RE SUBMITTAL TO THE AC IF NO, EXPLAIN:	ADILY AVAILABLE FOR INSPEC SENCY UPON REQUEST?	CTION, COPYING AND/OR	YES NO
	TODO OD MONITODING ACTIV	ITIES USED TO DETERMINE FEE	S RUI F APPLICABILITY OR
COMPLIANCE:	•		
Emission are insignit size.	icant from paved access ro	ad and parking area. Parking	area and road is Small III
b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED?		
Condition of paveme	nt		
c) DESCRIBE THE LOCA	TION OF EACH MONITOR AND	OR MONITORING PROCEDURES	S:
Visual inspection onl	y.	•	
d) IS EACH MONITOR EQU	JIPPED WITH A RECORDING D	EVICE?	YÉS NO
IF NO, LIST ALL MONIT	ORS WITHOUT A RECORDING	DEVICE:	Land 1 Land 1 / L
Visual inspection	•		

	COMPLIANCE	E INFORMATION	
11) IS EACH FUGITIVE POIN	NT IN COMPLIANCE WITH ALL	. APPLICABLE REQUIREMENTS?	YES NO
IF NO, THEN FORM 294-0 COMPLYING EMISSION U	CAAPP "COMPLIANCE PLAN/S INITS" MUST BE COMPLETED	SCHEDULE OF COMPLIANCE — AD DIAND SUBMITTED WITH THIS APP	DENDUM FOR NON PLICATION.
		•	
·			
12) EXPLANATION OF HOW	INITIAL COMPLIANCE IS TO E	BE, OR WAS PREVIOUSLY, DEMON	ISTRATED:
Access roads and park	ing areas are paved.		
13) EYPLANATION OF HOW	ONGOING COMPLIANCE WIL	L BE DEMONSTRATED:	
Maintain paved areas			
Maintain paved areas	and periodically vica		
TEST	ING MONITORING. REC	CORDKEEPING AND REPOR	RTING
	STUAT DELATE TO AID EMIS	SSIONS FOR WHICH RECORDS AR LIANCE, INCLUDE THE UNIT OF M	E BEING MAIN I AINED TO
DETERMINE FEES, RUI METHOD OF MEASURE	EMENT, AND THE FREQUENC	Y OF SUCH RECORDS (E.G., HOU	RLY, DAILY, WEEKLY):
PARAMETER	FUGITIVE POINT	METHOD OF MEASUREMENT	FREQUENCY
PM	Paved Road	Visual	Routinely
1.161			
		-	

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	REQUIREMENT(S)	Report Submittal upon request	REQUIREMENT(S)		REQUIREMENT(S)		
APPLICABLE RULES (CON'T)	EMISSION STANDARD(S)	IAC 212.316(g)	EMISSION STANDARD(S)		LICABLE: EMISSION STANDARD(S)		
APPLICAB	ILE(S) WHICH ARE APPLICABLE: REGULATED AIR POLLUTANȚ(S)	PM	RULE(S) WHICH ARE APPLICABLE: REGULATED AIR POLLUTANT(S)		10) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE. FUGITIVE POINTS(S) REGULATED AIR POLLUTANT(S)		
	8) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE: FUGITIVE POINTS(S)	Paved Road	9) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE: FUGITIVE POINTS(S) REGULATED AIR POLLUTANT REGULATED AIR POLLUTANT		10) PROVIDE ANY SPECIFIC TESTING RUL FUGITIVE POINTS(S)		

1.4 Take 5.1

The same

IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS 391-3.

APPLICATION PAGE 7-4 Printed on Recycled Paper 391-CAAPP

6) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATIONS(S) WHICH ARE APPLICABLE TO FLIGHTIVE EMISSIONS AT THIS OCCUPANT AT 4 FTY.	AT THE SOURCE (E.G., ROAD SEGMENT F, PM-10, IAC	REQUIREMENT(S)	< 10% Opacity Ilmit					REQUIREMENT(S)	Control Measure Application, as applicable				
APPLICABLE RULES H ARE APPLICABLE TO FUGITIVE EMISSIONS	EMISSION STANDABOSS	TAD ASS CO.	IAC 272,376(d)					EMISSION STANDARD(S)	IAC 212.316(g)				
API MDARD(S) AND LIMITATIONS(S) WHICH A	REGULATED AIR POLLUTANT(S)	PM					NG RULE(S) WHICH ARE APPLICABLE:	REGULAI ED AIR POLLUTANT(S)	PM				
6) PROVIDE ANY SPECIFIC EMISSION STA 212.316(d), OPACITY < OR = 10% A14 F	FUGITIVE POINTS(S)	Road Segment					7) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE: FUGITIVE POINTS(S)	Paved Boad					

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IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS 391-3.

APPLICATION PAGE 7-3 Printed on Recycled Paper 391-CAAPP

GENERAL INFORMATION

4) PROVIDE THE FOLLOWING INFORMATION FOR THE FUGITIVE EMISSION POINTS AT THE SOURCE INCLUDED IN THIS APPLICATION. SIMILAR POINTS MAY BE GROUPED TOGETHER.

NOTE: ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, FROM WHICH THE ABOVE EMISSIONS, WERE BASED AND LABEL AS EXHIBIT 391-1. IF THE ABOVE SPACE WAS NOT ADEQUATE, LIST ALL OTHER FUGITIVE POINTS AND INCLUDE THE REQUIRED INFORMATION ON THIS ATTACHMENT.

FOR PAVED AND UNPAVED ROADS, INCLUDE ROAD MILES (E.G., 6 MILES OF UNPAVED ROADS); FOR STORAGE PILES, INDICATE THE MATERIAL BEING STORED (E.G., 20 LIMESTONE STORAGE PILES); FOR EQUIPMENT LEAK POINTS, GROUP SIMILAR POINTS TOGETHER (E.G., 15 ORGANIC LIQUID PUMPS); FOR TRANSFER POINTS, IDENTIFY THE ORIGIN AND DESTINATION OF TRANSFER AND THE MATERIAL BEING TRANSFERRED (E.G., 5 BELT TO BIN TRANSFERS OF CORN).

UNCONTROLLED ANNUAL EMISSIONS (TONS/YR)

FUGITIVE POINT(S)	REGULATED AIR POLLUTANT(S)	MAXIMUM	TYPICAL
Paved Road (1 miles)	РМ	0.1	0.02
:			

5) ATTACH A DIAGRAM OF THE SOURCE THAT INDICATES THE LOCATION OF ALL FUGITIVE EMISSION POINTS. A SKETCH DRAWING WITH THE PROPER NOTATIONS IS SUFFICIENT. ALTERNATIVELY, THE REQUIRED INFORMATION MAY BE PLACED ON A COPY OF AN EXISTING PLAN OR MAP SUBMITTED WITH THIS APPLICATION (E.G., PLOT PLAN/MAP). ALSO INDICATE ON THIS DIAGRAM THE LOCATION OF ANY AMBIENT AIR MONITORING STATIONS. LABEL THIS DIAGRAM 391-2. NOTE: EQUIPMENT LEAK FUGITIVE EMISSION POINTS NEED NOT BE SHOWN ON THIS DIAGRAM.



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Revision #:								
Date: / /								
Page of								
Source Designation:								

FUGITIVE EMISSIONS	
DATA AND INFORMATION	I

FORA	GENCY USE ONLY	1
ID NUMBER:		-
EMISSION POINT #:		
DATE.		
DATE:		

THIS FORM MAY BE COMPLETED FOR FUGITIVE EMISSION ACTIVITIES RATHER THAN COMPLETING AN EMISSION UNIT OR STAND ALONE FORM. FUGITIVE EMISSIONS ARE DEFINED AS THOSE EMISSIONS WHICH COULD NOT REASONABLY PASS THROUGH A STACK, CHIMNEY, VENT OR OTHER FUNCTIONALLY EQUIVALENT OPENING. NOTE THAT UNCAPTURED PROCESS EMISSION UNIT EMISSIONS ARE TYPICALLY NOT CONSIDERED FUGITIVE AND MUST BE ACCOUNTED FOR ON THE APPROPRIATE EMISSION UNIT OR STAND ALONE FORM. ANY EMISSIONS AT THE SOURCE NOT PREVIOUSLY ACCOUNTED FOR ON AN EMISSION UNIT OR STAND ALONE FORM MUST BE ACCOUNTED FOR ON THIS FORM.

SOME EXAMPLES OF EMISSIONS WHICH ARE TYPICALLY CONSIDERED FUGITIVE ARE;

- ROAD DUST EMISSIONS (PAVED ROADS, UNPAVED ROADS, AND LOTS)
- STORAGE PILE EMISSIONS (WIND EROSION, VEHICLE DUMP AND LOAD)
- LOADING/UNLOADING OPERATION EMISSION
- EMISSIONS FROM MATERIAL BEING TRANSPORTED IN A VEHICLE
- EMISSIONS OCCURRING FROM THE UNLOADING AND TRANSPORTING OF MATERIALS COLLECTED BY POLLUTION CONTROL EQUIPMENT
- EQUIPMENT LEAKS (E.G., LEAKS FROM PUMPS, COMPRESSORS, IN-LINE PROCESS VALVES, PRESSURE RELIEF DEVICES, OPEN-ENDED VALVES, SAMPLING CONNECTIONS, FLANGES, AGITATORS, COOLING TOWERS, ETC.)
- GENERAL CLEAN-UP VOM EMISSIONS

NOTE THAT TOTAL EMISSIONS FROM THE SOURCE (TS) ARE EQUAL TO SOURCE-WIDE TOTAL EMISSION UNIT EMISSIONS (PT) PLUS TOTAL FUGITIVE EMISSIONS (FT), E.G., TS = PT + FT.

SOURCE INFORMATION									
1) SOURCE NAME:		,							
NA CME Steel Processing									
2) DATE FORM PREPARED:	3) SOURCE ID NO. (IF KNOWN):								
October 3, 2005	031600FWL								

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE 7-1

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FOR APPLICANT'S USE	•

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S PROPOSED TO BE	TS THE	APPLICABILITY LEVEL (INITS)	18 (ppmv)				THE REAL PROPERTY AND ASSESSMENT OF A PROPERTY OF THE PROPERTY						
F HAPS AT ACTIVITIE	E THAT AN APPLICANT MAY PRESUME THAT AN EMISSION UNIT DOES NOT EMIT A HAP IF IT MEETS THE	APPLICABLE RULE	40 CFR 63, Subpart CCC	40 CFR 63 Subpart CCC								·	
EMISSIONS O	IT DOES NOT	OTHER TERMS ²											
SSIONS MUST INCLUDE	N EMISSION UŃ	POTENTIAL EMISSIONS (TONS/YR)	0.951	0.44									
LUTANT EMI S. THIS TABLE	ESUME THAT AI	TYPICAL EMISSIONS (TONS//YR)	0.951	0.44									
(6) HAZARDOUS AIR POLLUTANT EMISSIONS E REGULATED AIR POLLUTANTS, THIS TABLE MUST INC	PLICANT MAY PRE	MAXIMUM EMISSIONS (TONS/YR)	0.951	0.44						ANNE ANN DE COMPANY DE COMPANY DE COMPANY DE COMPANY DE COMPANY DE COMPANY DE COMPANY DE COMPANY DE COMPANY DE			
(6) HAZARDO S WHICH ARE REGULATED , 01.211. NOTE THAT AN APP	OLIZII. NOIE IHAI AN APP	EMISSION UNIT DESIGNATION.	Pickle Line	ASTs									,
VG TABLE FOR ALL HA	ADM. CODE 201,209.	¹ CAS NUMBER	7647-01-0	7647-01-0		-	And the second of the second o						
COMPLETE THE FOLLOWING TABLE FOR <u>ALL</u> HAPS WHICH AR INSIGNIFICANT PURSUANT TO 35 IL. ADM. CODE 201.211. NOT	REQUIREMENTS OF 35 IL. ADM. CODE 201.209.	NAME OF HAP EMITTED:	НСІ	НСІ									

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APPLICATION PAGE 6-2 Printed on Recycled Paper 215-CAAPP

[,] CAS - CHEMICAL ABSTRACT SERVICE PROVIDE OTHER TERMS AS NECESSARY TO ESTABLISH APPLICABILITY OR COMPLIANCE WITH REQUIREMENTS,



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FOR APPLICANT'S USE
Revision #:
Date: / /
Page of
Source Designation:

	THE PROPERTY OF THE PROPERTY O						
HAZARDOUS AIR POLLUTANT (HAP) EMISSION SUMMARY	FOR AGENCY USE ONLY ID NUMBER: PERMIT #: DATE:						
SOURCE IN	FORMATION						
1) SOURCE NAME:							
DOEDADED:	SOURCE ID NO. (IF KNOWN): <i>031600FWL</i>						
	DLLUTANT EMISSIONS						

4) DOES ANY EMISSION UNIT AT THE SOURCE EMIT A HAZARDOUS AIR PULLUTANT? (IF NO, THEN THE REMAINDER OF THIS FORM NEED NOT BE COMPLETED) TYES NO 52) DOES THE SOURCE HAVE THE POTENTIAL TO EMIT, IN THE AGGREGATE,: 1) 10 TONS PER YEAR OR MORE OF ANY INDIVIDUAL HAZARDOUS AIR POLLUTANT; WES NO 11) 25 TONS PER YEAR OR MORE OF ANY COMBINATION OF HAZARDOUS AIR POLLUTANTS; 12) SUCH LESSER QUANTITY AS ESTABLISHED BY RULE WHICH CLASSIFIES THE SOURCE AS MAJOR FOR HAZARDOUS AIR POLLUTANTS; 14) EMISSIONS OF HAZARDOUS AIR POLLUTANTS WHICH EQUAL OR EXCEED A POLLUTANT SPECIFIC CAAPP APPLICABILITY LEVEL AS ESTABLISHED BY USEPA RULE SUCH THAT THE SOURCE IS REQUIRED TO OBTAIN A CAAPP PERMIT SOLELY FOR THIS REASON (i.e., HAP EMISSIONS BELOW THE CAAPP APPLICABILITY THRESHOLDS SPECIFIED IN ITEMS (i), (ii) &(iii) &(iii) ABOVE, BUT STILL REQUIRED TO OBTAIN A CAAPP PERMIT PURSUANT TO A REGULATORY REQUIREMENT, e.g., NESHAP)? 15) IF ANSWERED YES TO ANY OF THE ABOVE, IDENTIFY THE HAP(S) FOR WHICH THE SOURCE IS CONSIDERED MAJOR OR REQUIRED TO OBTAIN A CAAPP PERMIT: Hydrochloric Acid (HCI) Emissions	MAZARDOUG AIRT OLI HITANTS		
ii) 10 TONS PER YEAR OR MORE OF ANY INDIVIDUAL HAZARDOUS AIR POLLUTANT; VES NO NO NO NO NO NO NO NO NO NO	4) DOES ANY EMISSION UNIT AT THE SOURCE EMIT A HAZARDOUS AIR POLLUTANT? (IF NO, THEN THE REMAINDER OF THIS FORM NEED NOT BE COMPLETED)	YES	NO
ii) 10 TONS PER YEAR OR MORE OF ANY INDIVIDUAL HAZARDOUS AIR POLLUTANT; VES NO NO NO NO NO NO NO NO NO NO	TO THE MITTIES OF THE MANAGEMENT OF THE MANAGEME		
ii) 10 TONS PER YEAR OR MORE OF ANY INDIVIDUAL HAZARDOUS AIR POLLUTANT; VES NO NO NO NO NO NO NO NO NO NO	5a) DOES THE SOURCE HAVE THE POTENTIAL TO EMIT, IN THE AGGREGATE,		
POLLUTANTS; III) SUCH LESSER QUANTITY AS ESTABLISHED BY RULE WHICH CLASSIFIES THE SOURCE AS MAJOR FOR HAZARDOUS AIR POLLUTANTS; IV) EMISSIONS OF HAZARDOUS AIR POLLUTANTS WHICH EQUAL OR EXCEED A POLLUTANT SPECIFIC CAAPP APPLICABILITY LEVEL AS ESTABLISHED BY USEPA RULE SUCH THAT THE SOURCE IS REQUIRED TO OBTAIN A CAAPP PERMIT SOLELY FOR THIS REASON (i.e., HAP EMISSIONS BELOW THE CAAPP APPLICABILITY THRESHOLDS SPECIFIED IN ITEMS (i), (ii) &(iii) ABOVE, BUT STILL REQUIRED TO OBTAIN A CAAPP PERMIT PURSUANT TO A REGULATORY REQUIREMENT, e.g., NESHAP)? (b) IF ANSWERED YES TO ANY OF THE ABOVE, IDENTIFY THE HAP(S) FOR WHICH THE SOURCE IS CONSIDERED MAJOR OR REQUIRED TO OBTAIN A CAAPP PERMIT:		X YES	NO
SOURCE AS MAJOR FOR HAZARDOUS AIR POLLUTANTS. IV) EMISSIONS OF HAZARDOUS AIR POLLUTANTS WHICH EQUAL OR EXCEED A POLLUTANT SPECIFIC CAAPP APPLICABILITY LEVEL AS ESTABLISHED BY USEPA RULE SUCH THAT THE SOURCE IS REQUIRED TO OBTAIN A CAAPP PERMIT SOLELY FOR THIS REASON (i.e., HAP EMISSIONS BELOW THE CAAPP APPLICABILITY THRESHOLDS SPECIFIED IN ITEMS (i), (ii) &(iii) ABOVE, BUT STILL REQUIRED TO OBTAIN A CAAPP PERMIT PURSUANT TO A REGULATORY REQUIREMENT, e.g., NESHAP)? D) IF ANSWERED YES TO ANY OF THE ABOVE, IDENTIFY THE HAP(S) FOR WHICH THE SOURCE IS CONSIDERED MAJOR OR REQUIRED TO OBTAIN A CAAPP PERMIT:	POLLUTANTS;	YES	NO
POLLUTANT SPECIFIC CAAPP APPLICABILITY LEVEL AS ASTABAP PERMIT RULE SUCH THAT THE SOURCE IS REQUIRED TO OBTAIN A CAAPP PERMIT SOLELY FOR THIS REASON (i.e., HAP EMISSIONS BELOW THE CAAPP APPLICABILITY THRESHOLDS SPECIFIED IN ITEMS (i), (ii) & (iii) ABOVE, BUT STILL REQUIRED TO OBTAIN A CAAPP PERMIT PURSUANT TO A REGULATORY REQUIREMENT, e.g., NESHAP)? b) IF ANSWERED YES TO ANY OF THE ABOVE, IDENTIFY THE HAP(S) FOR WHICH THE SOURCE IS CONSIDERED MAJOR OR REQUIRED TO OBTAIN A CAAPP PERMIT:	SOURCE AS MAJOR FOR HAZARDOUS AIR POLLOTANTS,	YES	NO
SOURCE IS CONSIDERED MAJOR OR REQUIRED TO OBTAIN TO STATE OF THE STATE OF THE SOURCE IS CONSIDERED MAJOR OR REQUIRED TO SOLVEN TO STATE OF THE SOURCE IS CONSIDERED MAJOR OR REQUIRED TO SOLVEN TO STATE OF THE SOURCE IS CONSIDERED TO SOLVEN TO STATE OF THE SOURCE IS CONSIDERED TO SOLVEN TO STATE OF THE SOURCE IS CONSIDERED TO SOLVEN TO	POLLUTANT SPECIFIC CAAPP APPLICABILITY LEVEL AS LISTABLISHED TO PERMIT RULE SUCH THAT THE SOURCE IS REQUIRED TO OBTAIN A CAAPP PERMIT SOLELY FOR THIS REASON (i.e., HAP EMISSIONS BELOW THE CAAPP APPLICABILITY THRESHOLDS SPECIFIED IN ITEMS (i), (ii) &(iii) ABOVE, BUT STILL REQUIRED TO OBTAIN A CAAPP PERMIT PURSUANT TO A REGULATORY REQUIREMENT, e.g., NESHAP)?	YES	NO
Hydrochloric Acid (HCI) Emissions	b) IF ANSWERED YES TO ANY OF THE ABOVE, IDENTIFY THE HAP(S) FOR WHICH THE SOURCE IS CONSIDERED MAJOR OR REQUIRED TO OBTAIN A CAAPP PERMIT:		
	Hydrochloric Acid (HCl) Emissions		

HAZARDOUS AIR POLLUTANT EMISSIONS TABLE

6) COMPLETE THE FOLLOWING TABLE FOR ALL HAPS WHICH ARE REGULATED AIR POLLUTANTS. THIS TABLE MUST INCLUDE EMISSIONS OF HAPS AT ACTIVITIES PROPOSED TO BE INSIGNIFICANT PURSUANT TO 35 IL. ADM. CODE 201.211. NOTE THAT AN APPLICANT MAY PRESUME THAT AN EMISSION UNIT DOES NOT EMIT A HAP IF IT MEETS THE REQUIREMENTS OF 35 IL. ADM. CODE 201.209.

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPLICATION BEING DENIED. APPROVED BY THE FORMS MANAGEMENT CENTER. FOR APPLICANT'S USE

APPLICATION PAGE 6-1

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Exhibit 232-5 HCL AST Emission Calculations NACME Steel Processing 429 West 127th Street Chicago, Illinois

HCL Emissions - Storage Tanks

A concentrated solution (36% HCl) is kept in storage tanks prior to dilution with additional water in the Pickling Line.

Total HCl Solution Usage = 1,103,250 gallons/yr

AST Working/Standing Losss Emissions routed to scrubber for control.

Current Permitted Rate 0.44 tons HCl/yr and 0.1 lbs HCl/hr

Estimated AST HCI Emissions (after Control) 0.1 lbs HCl/hr 0.44 tons HCl/yr*

	ACCES	SS HATCH	
BOLT COVER, GASKETED:	UNBOLTED COVE GASKETED:		UNBOLTED COVER, UNGASKETED:
BOLTED COVER,		UGE FLOAT WEL	
BOLTED COVER, GASKETED:	UNBOLTED COVE GASKETED:	iR,	UNBOLTED COVER, UNGASKETED:
	COLIN		
BUILT-UP COLUMN-SLIDING	BUILT-UP COLUM	IN WELL N-SLIDING	PIPE COLUMN-FLEXIBLE
COVER, GASKETED:	COVER, UNGASKE	ETED:	FABRIC SLEEVE SEAL:
PIPE COLUMN-SUDING		DIDECOLUMN	
COVER, GASKETED:		PIPE COLUMN- COVER, UNGAS	
	LADDE	R WELL	
LIDING COVER, BASKETED:	,	SLIDING COVER UNGASKETED:	
	SAMPLE PIF	PE OR WELL	· .
LOTTED PIPE-SUDING OVER, GASKETED:	SLÖTTED PIPE-SUI COVER, UNGASKE		SAMPLE WELL-SLIT FABRIC SEAL (10% OPEN AREA):
	ROOF LEG OR F	HANGER WELL	J
DJUSTABLE:		FIXED:	
	VACUUM E	SDEVKEB	
EIGHTED MECHANICAL	<u> </u>	WEIGHTED MEC	HANICAL
TUATION, GASKETED:		ACTUATION, UN	
	STUB D	RAIN	
ICH DIAMETER:			
	OTHER (E)	XPLAIN)	
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657) **,

APPLICATION PAGE 5-10

Printed on Recycled Paper 232-CAAPP

EL OATIN	G ROOF TANK EQUIPMENT	TINFORMATION (IF APPLICABLE)
54) FLOATING ROOF	INTERNAL	EXTERNAL
TYPE (CHECK ONE):		
N/A	OTHER; SPECIFY:	
55) PRIMARY SEAL TYPE		LIQUID MOUNTED VAPOR MOUNTED
(CHECK ONE):	METALLIC SHOE	RESILIENT SEAL RESILIENT SEAL
	SEAL	
	OTHER; SPECIFY:	
THE ELOATING BOO	F EQUIPPED WITH A SECONDAR	Y SEAL? YES NO
IF YES, HOW IS THE SECONDARY SEAL	SHOE	RIM
MOUNTED? (CHECK	OTHER; SPECIFY:	
ONE):	,	·
57) IS THE FLOATING ROO	OF EQUIPPED WITH A WEATHER	SHIELD? YES NO
ER WHAT IS THE AVERAG	SE WIND SPEED AT THE TANK SI	TE (MILES/HR)?
50) WHAT IS THE !!		
59) WHAT IS THE	LIGHT RUST	DENSE RUST GUNITE LINED
CONDITION OF THE TANK SHELL	LIGHT NOST	
INTERIOR? (CHECK ONE):	OTHER; EXPLAIN:	
J. 127	•	
		OLLOWING:
	RTED TANKS, COMPLETE THE F	DIAMETER OF EACH COLUMN
	NUMBER OF COLUMNS	(FT)
	COLUMNIA	
61) FOR INTERNAL FLOA	TING ROOF TANKS, COMPLETE	THE FOLLOWING:
1		WELDING
a) WHAT IS THE METHOD OF	BOLTING	L WELDING
BONDING FOR THE DECK?	OTHER; SPECIFY:	
	TOU OF AMO	/FT1?
b) WHAT IS THE TOTA	L LENGTH OF ALL DECK SEAMS	V ()
c) WHAT IS THE DIAM	ETER OF THE DECK (FT)?	
)		
i i		

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																				_
	ILE	APPLICABLE	RULE	40CFR63 1151																GFR 61
	ALLOWABLE BY RULE	⁵ RATE OR STANDARD		Rate Emissions to Scrubber																98% by wt control device Jeak-tight trucks
CO DAY A THE	OKINATION	4ом		4																2.
T EMICCIONIN	TE SSION RATE	³ OTHER	IERMS																	
(53) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION	Actual emission rate 1 Uncontrolled emission rate	TONS PER YEAR	(TONS/YK)	0.44																7.2 0.8
	1ACTU	POUNDS PER HOUR	(EDS/ITIN)	0.1											·					10.g 8:0
(53				MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	махімим: Туріса <u>і</u>
	TION	2CAS		7647-01-0				· · · · · · · · · · · · · · · · · · ·										-		71432
	HAP INFORMATION	NAME OF HAP		HCI																EXAMPLE: Bênzene

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745 920

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IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 232-5.

¹PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.

2CAS - CHEMÍCAL ABSTRACT SERVICE NUMBER.

³PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GRUDSCF, ETC.).

⁴DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE. 3) STANDARD EMISSION FACTOR (AP 42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION RACTOR (NOT AP 42 OR AIRS).

⁵RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

APPLICATION PAGE 5-8 Printed on Recycled Paper 232-CAAPP

FEGUALIED AIR FEGUALIED AI						(52)E	NOISSINI	(52)EMISSION INFORMATION	TION				
Libs Figh Tower Per 30TH ER 40M 5PATE LUNTS RATE LUNTS LIBS TOWS PER HOUR FEATE LUNTS FEATE LUNTS FAULE FAULE LUNTS FAULE FAULE FAULE LUNTS FAULE FAUL			الحا ا	TACTUAL EF	MISSION RATE			ALLOV	VABLE BY	RULE EMISSI	ON RATE	PERMITTED EMIS	SION RATE
LISS PR				Y JUNCONTR	JLLED EMISSIC	IN RATE							
TYPICAL:	LATED AIR LUTANT		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	³ OTHER TERMS	³ OTHER TERMS	⁴ DM	⁵ RATE	(UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)		TONS PER YEAR (TONS/YR)
TYPICAL TYPI		MAXIMUM:							<u> </u>	٠			
TYPICAL:	ухіре (со)	TYPICAL:							()				
TYPICAL:		MAXIMUM;							7)				
TYPICAL:		TYPICAL:							()				
TYPICAL: ()	TROGEN	MAXIMUM:							<u> </u>	*	٠		
MAXIMUM. 5.00 21.9 6.0,(LBS/HR) 40.00	DES (NOx)	TYPICAL:							<u></u>				
TYPICAL:	TICULATE	MAXIMUM:							()				
MAXIMUM: 5.00 21:9; GRODSCE 744 SETUBSHR 75 75 75 75 75 75 75 7	TER (PART)	TYPICAL:							()				
TYPICAL:	TER <= 10	MAXIMUM:							^ _				
MAXIMUM: 5.00 21.9 6.0(LBSHR) 40CFR63.115 26.28 TYPICAL: A. 44 A. 60(LBSHR) 21.3221 25.28 TYPICAL: A. 40 A. 60(LBSHR) 21.3221 25.28 TYPICAL: A. 44 A. 60(LBSHR) 21.3221 25.28 TYPICAL: A. 60 14.44 GRYDSGE 4	ROMETERS (PM10)	TYPICAL:							()				
TYPICAL: () () () () MAXIMUM: 0.1 d 4 0.44 0.1 (lbs/hr) 40CFR63.115 0.44 0.1 lbs/hr TYPICAL: 0.1 a 4 0.24* 6.0 (lbs/HR) 212.321 26.28 5.5 lbs/HR TYPICAL: 4.00 74.4 0.24* 4.00 5.5 lbs/HR 5.5 lbs/HR	SULFUR	MAXIMUM:							()				
MAXIMUM: 0.1 0.24 0.1 lbs/hr TYPICAL: 0.1 0.44 0.1 lbs/hr MAXIMUM: 5.00 21.9 GROSCE 1 TYPICAL: 4.00 14.4 GROSCE 4 TYPICAL: 4.00 14.4 GROSCE 4	KIDE (SOS)	TYPICAL:			*				()				
TYPICAL: 0.1 0.44 0.1 (lbs/hr) 40CFR63.115 0.44 0.1 lbs/hr TYPICAL: 0.1 0.14 0.04 0.1 (lbs/hr) 40CFR63.115 0.44 0.1 lbs/hr MAXIMUN: 5.00 21.9 GROSCE 1 6.0 (LBS/HR) 212.321 20.28 5.5 LBS/HR TYPICAL: 4.00 14.4 GRYDSCE 4 5.5 (LBS/HR) 212.321 19.80	OLATILE RGANIC	MAXIMUM;							^ _				
MAXIMUM: 0.1 0.44 0.1 lbs/hr 40CFR63.115 0.44 0.1 lbs/hr TYPICAL: 0.1 0.14 0.03 1 6.0 (LBS/HR) 212.321 20.28: 5.5 LBS/HR TYPICAL: 4:00 14.4 GR/DS/GF 4 56 (LBS/HR) 212.321 19.80	RIAL (VOM)	TYPICAL:							() .				
TYPICAL: 0.1 0.44 0.3	OTHER, PECIFY:	MAXIMUM:	0.1	0.44				9	7,1 (lbs/hr)	40CFR63.115	0.44	0.1 lbs/hr	0.44
махімім 5.00 21:9 0.3 1 6.0 (LBSHR) 21:321 26:28 ТУРІСАЦ: 4:00 14:4 0.24 4:00 19:80	НСІ	TYPICAL:	0.1	0.44									
TYPIDAL: 4:00 14.4 GRYDSGF 4 5.5(LBS/HR) 212:321	XAMPLE: TICULATE	MAXIMUM:	1.8 63		. 0.3 GRØSCF			7)09	BS/HR)	212.321	26:28	5.5 LBS/HR	22
	IATTER	TYPICAL:	4:00		0.24 GR/DSCF		4	5.5 (1	BS.HR)	212.321	19.80		

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IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 2324,

1CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.
PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GRUDSCF, ETC.)

4DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP 42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP 42 OR AIRS)

5RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

APPLICATION PAGE 5-7 Printed on Recycled Paper 232-CAAPP

49c) DESCRIBE THE LOCATION OF EACH MONITOR:		
Not Applicable		
d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE?	YES	МО
IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:		<u></u>
•		
e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY	YES	No
BASIS?		LJ''
IF NO, EXPLAIN:		
f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED TANK IS IN	YES	No
OPERATION?		L110
IF NO, EXPLAIN:		
50) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RE	SULTS ARE USED I	OR
PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIA	TING DURING THE T	
SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL	AS EXHIBIT 232-3:	
TEST DATE TEST METHOD TESTING COMPANY CONDITIONS	SUMMARY OF F	RESULTS
51) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQ	UENCY OF REPORT	
SUBMITTALS TO THE AGENCY:		
REPORTING REQUIREMENTS TITLE OF REPORT	FREQUENCY	

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47) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:					
Maintenance of records - Material throughput, tank dimensions/Vent systems, etc.					
	- . ,	•			
TOTAL MONTORING PEOORBYEERING AND DEPORTING					
TESTING, MONITORING, RECORDKEEPING AND REPORTING 48a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO					
48a) LIST THE PARAMETERS	STHATRELATE TO AIR EMI FAPPHICABILITY OR COMP	PLIANCE, INCLUDE THE UNIT OF M	EASUREMENT, THE		
METHOD OF MEASURE	MENT, AND THE FREQUEN	CY OF SUCH RECORDS (E.G., HOU	RLY, DAILY, WEEKLY):		
			λ		
PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY		
HCl Solution Usage	Tank Throughput	Maintenance of Usage Records	Monthly		
Tank Dimensions	Volume/Height/	Maintenance of Records	Ongoing		
	Diameter				
		APPO MILL DE CREATED AND MAIN	TAINED FOR EACH		
RECORDED PARAMETER	RINCLUDE THE METHOD O	RDS WILL BE CREATED AND MAIN F RECORDKEEPING, TITLE OF PER TACT FOR REVIEW OF RECORDS:	SON RESPONSIBLE FOR		
PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON		
HCI Solution Usage	Delivery Logs	Maintenance Manager	Production Manager		
Usage			9		
O IS COMPLIANCE OF THE	EMISSION UNIT READILY	DEMONSTRATED BY REVIEW OF	K-Z		
THE RECORDS?			YES NO		
IE NO EVOLABL					
IF NO, EXPLAIN:					
		-			
d) ARE ALL RECORDS REA	DII Y AVAILABLE FOR INSPI	ECTION, COPYING AND/OR			
SUBMITTAL TO THE AGE		•	YES NO		
IE IIO MURI AMI					
IF NO, EXPLAIN:					
•					
		•			
492) DESCRIBE ANY EMISSI	ON MONITORS USED TO DE	ETERMINE FEES, RULE APPLICABIL	ITY OR COMPLIANCE:		
45a) DECOMBE ANT EMICON					
Not Applicable					
			,		
b) WHAT PARAMETER(S) IS	(ARE) BEING MONITORED	(E.G., TEMPERATURE)?			
Not Applicable					

13.00 10.00 10.00

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APPLICATION PAGE 5-5
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APPLICABLE RULES						
39) PROVIDE ANY SPECIFIC EMISSION TO THIS TANK (E.G., VOM, IAC 218.1	STANDARD(S) AND LIMITATIONS(S) SE 121(a), PRESSURE TANK):	ET BY RULE(S) WHICH ARE APPLICABLE				
REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)				
HCI	40 CFR 63.1159 (Subpart CCC)	Closed-vent system for each vessel				
40) PROVIDE ANY SPECIFIC RECORDKI	EEPING RULE(S) WHICH ARE APPLICA	BLE TO THIS TANK:				
REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(5)	REQUIREMENT(S)				
HCI	35 IAC 201.301	Compliance Records				
41) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS TANK:						
REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)				
HCI	35 IAC 201.302	Annual Reporting/Compliance Notification				
		, war and a second				
	TO DATE OF MALES AND LOAD FOR	FO TING TANK.				
42) PROVIDE ANY SPECIFIC MONITORIN REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)				
HCI	40 CFR 63.1163	Semi-Annual Inspection				
HUI	40 C/ N 03.1703	Octavalina inspection				
	ULEO ANDIOD EDOCEDI IDEC MUIOL A	ADDUCABLE TO THIS TANK.				
43) PROVIDE ANY SPECIFIC TESTING RI REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)				
44) DOES THE TANK QUALIFY FOR AN E	XEMPTION FROM AN OTHERWISE					
APPLICABLE RULE?		YES NO				
IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 232-2, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.						
AT TACHEL TILOTAL DE LEGITATE CONTRA TACE DE LA TACE DEL TACE DE LA TACE DE L						
COMPLIANCE INFORMATION						
45) IS THE TANK IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS?: YES YES NO THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.						
6) EXPLANATION OF HOW INITIAL COMP	•					
Maintenance of records - Material 1	throughput, tank dimensions/Vent	systems, etc.				

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Section 2

APPLICATION PAGE 5-4
Printed on Recycled Paper 232-CAAPP

MATERIAL STORED AND THROUGHPUT INFORMATION					
25) CHEMICAL NAME OF MATERIAL STORED:					
Hydrochloric Acid (36% Solution) 26) CAS NO. (IF KNOWN):	27) DENSITY				
7647-01-0	(LB/CU.FT.):				
7047-01-0	(LB/GALLON): 9.91				
28) VAPOR PRESSURE AT 70 DEGREES	29) MOLECULAR WEIGHT				
FAHRENHEIT (PSIA):	(LB/LB-MOLE):				
26 mmHg	36.46				
30) VAPOR PRESSURE AT MAXIMUM STORAGE TEMPERA	TURE (PSIA):				
Ambient-Same					
31) METHOD USED TO DETERMINE VAPOR ASTM D2879-86	PUBLISHED LITERATURE, LIST:				
PRESSURE PURSUANT TO 35 ILL. ADM. CODE	MSDS				
215.108, 218.109-111, OR	noes				
219.109-111:					
OTHER; SPECIFY:					
OTHER; SPECIFY:	·				
32) STORAGE TEMPERATURE					
MINIMUM (DEGREES	MAXIMUM (DEGREES				
FAHRENHEIT):	FAHRENHËIT): Ambient				
Ambient	- Timbori				
33) THROUGHPUT					
GAL/DAY:	GAL/YR:				
200178	1,303,250				
BBLS/DAY:	BBLS/YR:				
34) MAXIMUM FILL RATE (GAL/HR):					
35) IS A PERMANENT SUBMERGED LOADING PIPE USED?					
35) 15 A PERIVARIENT SUBMERGED LOADING ! II 2 3525 !	YES NO				
36) IS A VAPOR BALANCE LINE USED?	П				
	YES NO				
37) IS ANY OTHER VAPOR LOSS CONTROL DEVICE USED	(OTHER THAN VAPOR YES NO				
BALANCE)?					
IF YES, COMPLETE "AIR POLLUTION CONTROL EQUIP	S APPLICATION.				
INFORMATION, " (FORM 260-CAAPP), AS PART OF THIS	S APPLICATION. ARE AIR EMISSION RELATED, FROM WHICH THE				
INCODE A TION # /FORM 260-CAAPPLAS PART OF THE	S APPLICATION. ARE AIR EMISSION RELATED, FROM WHICH THE				

11) PROVIDE THE NAME TANK, IF APPLICABL MUST BE COMPLETE	E IFORM 2	60-CAAPP AN	ND THE APPR	OPRIATE 26	CAADDADD	ENDUM EODM	THIS
Scrubber							
12) PROVIDE ANY LIMITA STANDARDS (E.G., P	ATIONS ON RODUCTIO	SOURCE OF N VARIATION	PERATION AF N, ETC.):	FECTING EN	MISSIONS OR A	ANY WORK PRACTICE	
Scrubber Working a	nd Stand	ing Loss En	nission Con	trol and En	closed Lines	•	
			ANK INFO	RMATION			
13) TANK CAPACITY (SPE	CIFY BAR	RELS OR GA	LLONS):				***************************************
14,000 gallons each 14) TANK DIAMETER OR \ 12	WIDTH (FT): 15) TANI 18.5	K HEIGHT (FT	·):	16) TAI	NK LENGTH (FT):	
17) TANK SHAPE (CHECK ONE):	CY	LINDRICAL		HORIZO	DNTAL	1	M. M. J. J. J. J. J. J. J. J. J. J. J. J. J.
	от	HER; SPECIF	<u></u>				
18) OUTSIDE COLOR OF TANK (CHECK ONE):	w	HITE		SILVER			
	от	HER; SPECIF 	Y: .				
19) TANK CONDITION (CHECK ONE):	⊠ GC	OD		FAIR		POOR	
20) TANK LOCATION (CHECK ONE):	UN	DERGROUND	o [X ABOVE	GROUND		
21) TANK TYPE (CHECK ONE):	FIX	ED ROOF		PRESS	URE		
	ROC	TERNAL FLO	ATING	INTERN	IAL FLOATING	ROOF	
		RIABLE VAPO					
	1 1	CIFY VOLUM! IER; SPECIFY		N CAPACITY	(bbl):		-
							_
22) VENT VALVE INFORMAT	10N: - <i>Du</i>	cted to Scru	ıbber				
TYPE OF VENT		NUMBER OF VENTS	PRESS SETTING		DISCHARGE FLARE,	VENTED TO (ATMOSPHE VAPOR CONTROL, ETC.)	RE,
COMBINATION	_						
PRESSURE	_ -						
VACUUM	-						
OPEN		1	0		L	cted to Scrubber	
THE INFORMATION IN ITEMS 23a) LATITUDE:	3 23 AND 2	4 BELOW NE		PROVIDED ONGITUDE:		VAILABLE	
24a) UTM ZONE:		b) UTM VEF	RTICAL (KM):		c) UTM H	ORIZONTAL (KM):	

APPLICATION PAGE 5-2

Printed on Recycled Paper 232-CAAPP



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

FOR AP	PLIC	ANT'	S USE
Revision #:			
Date:	_ / _		_ /
Page		of.	
Source Desi	gnati	on:	

STORAGE TANK DATA AND INFORMATION

FOR AGENCY USE ONLY
ID NUMBER:
EMISSION POINT #:
DATE:

NOTE: THIS INFORMATION FORM MUST BE COMPLETED FOR ANY TANK USED IN THE STORAGE OF AN ORGANIC LIQUID OR ANY MATERIALS CONTAINING HAZARDOUS AIR POLLUTANTS. FOR TANKS USED FOR PURPOSES OTHER THAN STORAGE, SUCH AS MIXING TANKS, DAY TANKS, PROCESS TANKS, ETC., PLEASE COMPLETE FORM 220-CAAPP.

SOURCE IN	FORMATION
1) SOURCE NAME:	
NACME Steel Processing	
2) DATE FORM	3) SOURCE ID NO.
PREPARED:	(IF KNOWN): 031600FWL
9/30/05	U37000FVVL
GENERAL IN	IFORMATION
4) TANK DESIGNATION:	
HCL Storage Tanks 1, 2, and 3	
5) FLOW DIAGRAM DESIGNATION OF TANK:	
HCI Storage Tanks 1, 2, and 3	
6) MANUFACTURER OF TANK (IF KNOWN):	
7) SERIAL NUMBER (IF KNOWN):	
8) DATES OF COMMENCING CONSTRUCTION,	a) CONSTRUCTION (MONTH/YEAR):
OPERATION AND/OR MOST RECENT MODIFICATION	
OF THIS TANK (ACTUAL OR PLANNED)	b) OPERATION (MONTH/YEAR):
	b) OF ENAMOR (MOINTER ENTY).
	c) LATEST MODIFICATION (MONTH/YEAR):
9) DESCRIPTION OF MODIFICATION (IF APPLICABLE):	
N/A	•
10) DOES THE TANK HAVE MORE THAN ONE MODE OF OP (E.G., IS THERE MORE THAN ONE PRODUCT STORED!	ERATION? N THE TANK?) YES NO
IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVEF 232-CAAPP MUST BE COMPLETED FOR EACH MODE):	(EDBY THIS APPLICATION (NOTE: A SEPARATE FORM
ZUZ-OAA I MOUT BE SOM EETED FOR ENDINGE = 7.	
	•

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

FOR APPLICANT'S USE

APPLICATION PAGE 5-1

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EXHIBIT 260-2 PICKLE LINE EMISSION CALCULATIONS

HCL Pickling Line Emission Calculations NACME Steel Processing 429 West 127th Street Chicago, Illinois

Operating Conditions

Annual HCl Solution Usage/AST Throughput = 1,103,250 gallons X 9.91 lbs/gal =

8,606,400 lbs Solution Usage/yr (4303.2 tpy)

Scrubber Water Flow = 2.6 gallons per minute (Average)

Emission Test Process Rate = 200 tons/six hours = 33.3333 tons per hour

Emission Testing Hourly Emissions Rate* = 0.217 lbs HCL/hr

Emission Factor = 0.217 lbs HCl per hour/33.3333 tons steel = 0.0065 lbs HCl/Ton Steel

Currrent Maximum Operating Hours = 3 shifts/day X 8 hrs/shift X 6 days/wk X 52 wks/yr = 7,488 hours/hr

Current Typical Operating Hours = 3 shfits/day X 8 hrs/shift X 5 days/wk X 52 wks/yr = 6,240 hrs/yr

Current Permitted Emission Factor (Scrubber Control)* = 0.0048 lbs HCL/1000 tons Steel Processed

Emission Scrubber Control Efficiency = 97-99% (Estimated)

Annual Steel Throughput = 292,000 tons/year (Based only on 2002 testing throughput rate)

Actual and Potential Emission Calculations (With Federally Enforceable Limitations)

Steel Pickling Emissions = 0.00652 lbs HCl/ton steel X 292,000 tons Steel/year = 1,903 lbs HCl Emitted/Year Estimated HCl AST Emissions = 0.44 tons HCl per yr**

Hourly Emission Rates

Pickling Line Emissions HCl lbs/hour = (1,902 lbs/year)/7,488 hours/year = 0,254 lbs HCl/hour

Potential to Emit (Without Control/No Enforceable Limitations)

Uncontrolled Pickling Line Emission Rate = 0.217 lbs HCVhr/(1-0.95) = 4.34 lbs HCVhr 4.34 lbs HCl per hour/33.333 tons steel per hour = 0.13 lbs HCl/ton steel throughput 0.13 lbs HCl/tons steel X 292,000 tons steel/yr = 38,018 lbs HCl/yr or 19.0 tpy HCl

Hourly HCl Solution/Water Usage

HCL Solution = 8,606,400 lbs HCl Solution per year/7,488 hours per year = 1150 lbs HCl Solution/hr or 4,303.2 tpy

Water = 2.6 gpm X 60 min/hr = 156.4 gal/hr = 1,303 lbs/hr or 9,760,140 lbs/yr (4880.1 tpy)

NESHAP Emission Limitations

Test Result HCl emission concentration = 6.87 ppmv 40 CFR 63, Subpart CCC HCl Emission Limit = 18 ppmv

* April 2002 Emission Test of scrubber stack exhaust (after Control). No Control Efficiency testing completed.

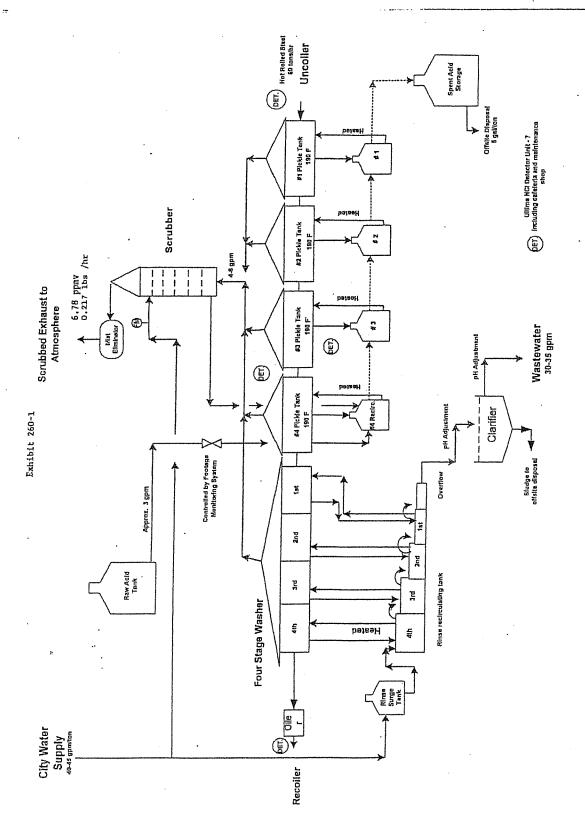
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NACME Pickling Process Flow Diagram

APPLICATION PAGE 4-11

	EXHAUST PO	INT INFORMATI	ON .
33) DESCRIPTION OF EXHAUST PO DISCHARGES INDOORS, DO N	DINT (STACK, VENT. R	OOF MONITOR, INC	OORS, ETC.). IF THE EXHAUST POINT
Stack			
34) DISTANCE TO NEAREST PLAN	T BOUNDARY FROM E	XHAUST POINT DIS	CHARGE (FT):
100			
35) DISCHARGE HEIGHT ABOVE G	RADE (FT):		
50			
36) GOOD ENGINEERING PRACTIC	E (GEP) HEIGHT, IF KI	NOWN (FT):	
37) DIAMETER OF EXHAUST POINT . 1.128 TIMES THE SQUARE ROC 2	(FT): NOTE: FOR A N OT OF THE AREA.	ON CIRCULAR EXH	AUST POINT, THE DIAMETER IS
38) EXIT GAS FLOW RATE	a) MAXIMUM (AC	CFM):	b) TYPICAL (ACFM):
	7,200		7,065
39) EXIT GAS TEMPERATURE	a) MAXIMUM ("F)	:	b) TYPICAL (°F):
	126.2		125.6
40) DIRECTION OF EXHAUST (VERT	ICAL, LATERAL, DOW	NWARD):	
. Vertical			
41) LIST ALL EMISSION UNITS AND	CONTROL DEVICES S	ERVED BY THIS EX	HAUST POINT:
NAME		FL	OW DIAGRAM DESIGNATION
a) Steel Pickling Line		Steel Pickling	j Line
b)			
C)			
3)			
9)			
)			
))		95	
2) WHAT PERCENTAGE OF THE CO EXHAUST POINT (%)?	NTROL EQUIPMENT E	MISSIONS ARE BEI	NG DUCTED TO THIS
100			
 IF THE PERCENTAGE OF THE CO NOT 100%, THEN EXPLAIN WHER 	NTROL EQUIPMENT E RE THE REMAINING EN	MISSIONS BEING D	OUCTED TO THE EXHAUST POINT IS
·			
HE FOLLOWING INFORMATION NEED ON Ha) LATITUDE:	LY BE SUPPLIED IF READ	ILY AVAILABLE. b) LONGITUDE:	
reny sur 1111 WW has		D) LONGITUDE:	
) UTM ZONE:	b) UTM VERTICAL	(KM).	ALITM UODIZONTA: WAS
y or media.	D) O IN VERTICAL	(MV);	c) UTM HORIZONTAL (KM):

\$44.0345

APPLICATION PAGE 4-10

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Γ	T	1	-		-		Т		Т		Т		Т			-			7 -
,	Щ	APPLICABLE	RULE	03.7767															CFR 61
N	ALLOWABLE BY RULE	⁵ RATE OR STANDARD	18nnm																4 88% by wt conitol device
FORMATIO		4 _{DM}	1																
I EMISSION IN		3OTHER TERMS																	
SOCIALITY EMISSION INFORMATION	¹ ACTUAL EMISSION RATE	TONS PER YEAR (TONS/YR)	0.951																2.0
	TACTUAL EN	POUNDS PER HOUR (LBS/HR)	0.217												ŕ				70.0
			MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	махімим:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM
TION	NOIL	² CAS NUMBER	7647-01-0		-												**************************************		
HAP INEOPMATION	THE THE PERMIT	NAME OF HAP EMITTED .	нсі	·															EXAMPLE:

7.3 7.3 7.5

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IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-6.

¹PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).

2CAS - CHEMICAL ABSTRACT SERVICE NUMBER.

3PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GROSCF, ETC.).

4DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).

5RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

APPLICATION PAGE 4-9
Printed on Recycled Paper 280-CAAPP.

The state of the s		ON RATE	TONS PER	YEAR (TONS/YR)																0.951 tpy			
## ## ## ## ## ## ## ## ## ## ## ## ##		PERMITTED EMISSION RATE	1	KAIE (UNITS)																0.0065 lbs HCl/ton steel			
		ION RATE	TONS PER	(TONS/YR)															Ş	0/			
	V DILL E CAMPO	r KULE EMISS	APPLICABLE	RULES															63 1161	23:1:20			
(31) EMISSION INFORMATION	ALLOWARI F RY DILL F CAUSOLOGIST		SRATE (UNITS)			<u></u>	0						()					,	() 18 (ppmv)		(Aurda) aı		
MISSION			40M	T					T														ă.
(31)E	RATE		3other repare	LENMO																			
	¹ ACTUAL EMISSION		OTHER																			GROSOF	0.24************************************
	¹ ACTUAL	TONS PER	YEAR (TONS/YR)																0.951	0.951	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	21.9	14.4
		LBS PER	(LBS/HR)																0.217	0.217	t later oo asster	300	4.00
				MAXIMUM:	TYPICAL:	MANIMUM	in Carlon	I YPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:	MAXIMUM:	TYPICAL:		MAXIMUM:	TYPICAL
	REGULATED AIR		I OFFOI AIN!	CARBON	MONOXIDE (CO)	1	LEAD		NITROGEN	OXIDES (NOx)	PARTICULATE	MATTER (PART)	PARTICULATE MATTER <= 10	MICROMETERS (PM10)	SULFUR	DIOXIDE (SOZ)	VOLATILE ORGANIC	MATERIAL (VOM)	OTHER, SPECIFY:	HCI	1	Ήi	WALIEK

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IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 280-5.

¹PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
²PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DEFERMINE THE PERMIT FEE.
³PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GRUDSCF, ETC.)
⁴DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
⁵RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

APPLICATION PAGE 4-8 Printed on Recycled Paper 280-CAAPP

CAPTURE AND CONTROL													
28) DESCRIBE THE CAPTURE SYSTEM USED TO CONTAIN, COLLECT AND TRANSPORT EMISSIONS TO THE CONTROL EQUIPMENT. INCLUDE ALL HOODS, DUCTS, FANS, ETC. ALSO INCLUDE THE METHOD OF CAPTURE USED AT EACH EMISSION POINT. (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 250-2):													
	Covered Pickling Tanks (two cover system)												
29)	29) ARE FEATURES OF THE CAPTURE SYSTEM ACCURATELY DEPICTED IN THE FLOW DIAGRAM CONTAINED IN THIS APPLICATION?												
	IF NO, A SKETCH SHOWING THE FEATURES OF THE CAPTURE SYSTEM SHOULD BE ATTACHED AND LABELED AS EXHIBIT 260-3:												
30) PROVIDE THE ACTUAL (MINIMUM AND TYPICAL) CAPTURE SYSTEM EFFICIENCY, CONTROL EQUIPMENT DESTRUCTION/REMOVAL EFFICIENCY, AND THE OVERALL REDUCTION EFFICIENCY PROVIDED BY THE COMBINATION OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT FOR EACH REGULATED AIR POLLUTANT TO BE CONTROLLED. ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EFFICIENCIES WERE BASED AND LABEL AS EXHIBIT 260-4:													
2)	CONTROL PERFORMANCE	E:											
	REGULATED CAPTURE SYSTEM CONTROL EQUIPMENT OVERALL REDUCTION AIR EFFICIENCY (%) EFFICIENCY (%)												
	POLLUTANT (MIN) (TYP) (MIN) (TYP) (MIN) (TYP)												
i	HCI 100 100 97-99 97-99 97-99 97-99												
ii													
m	ii												
1	COLANT TEMPERATURE, ETC B ppmv or mass emission METHOD USED TO DETER MANUFACTURER'S GUAR	on rate that cor	HE ABOVE EF	FICIENCIES (I	E.G., STACK TE	ST, MATERIAL							
	E	EFFICIENCY DETERI	MINATION METH	OD			TE LAST ESTED						
	CAPTURE:												
L	CONTROL:												
[OVERALL:			• •		Apı	ril 2002						
<u></u>	REQUIRED PERFORMANC	F •											
٠,		CAPTURE	CONTRO	ז ור	OVERALL								
	REGULATED AIR POLLUTANT	SYSTEM EFFICIENCY (%)	EQUIPME EFFICIENC	NT R	EDUCTION FICIENCY (%)	APPLICABI	LE RULE						
I	нсі					40 CFR6	3.1161						
; · [
EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION,													
C(C	DOLANT TEMPERATURE, ETC.	:											

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Y. 3 16.

Sec. E.

25d) IS EACH MONITOR EQUIPPED W	ITH A RECORDING DEVICE			
1			YES	NO
IF NO, LIST ALL MONITORS WITHO				
Scrubber Flow Meter - Recorde	d by hand once per shift	as required.		
e) IS EACH MONITOR REVIEWED FOR BASIS?	R ACCURACY ON AT LEAST	A QUARTERLY	YES	No
IF NO, EXPLAIN:			<u> </u>	
Reviewed for accuracy per manu	ufnaturaria annellinette e	_		
Neviewed for accuracy per mant	uracturer's specifications	5.		
1) IS EACH MONITOR OPERATED AT A	ALL TIMES THE CONTROL F	OUIPMENT IS IN		
OPERATION?		SCOT MENT 10 IN	YES	NO
IF NO, EXPLAIN:				
26) PROVIDE INFORMATION ON THE MO PURPOSES OF THE DETERMINATIO	OST RECENT TESTS, IF AN	Y, IN WHICH THE RES	ULTS ARE USED F	OR
DATE, IEST METHOD USED. TESTIN	NG COMPANY OPERATING	COMPITIONS EXISTIN	IC DUDING THE TE	TEST STANDA
SUMMARY OF RESULTS. IF ADDITION	ONAL SPACE IS NEEDED, A		S EXHIBIT 260-1:	
TEST DATE TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RE	SULTS
April Method 1-4,	GE Mostardi Platt	Typical	0.217 lbs/hr	(6.87
2002 26A			ppmv)	
			L	
27) DESCRIBE ALL REPORTING REQUIRE	EMENTS AND PROVIDE THE	TITLE AND FREQUE	NCY OF REPORT	
SUBMITTALS TO THE AGENCY:		· · · · · · · · · · · · · · · · · · ·	The same of the	
REPORTING REQUIREMENTS	TITLE OF REPORT		FREQUENCY	
Testing notification	Tst Notification		Prior to testing	
Annual Emission Reporting	Annual Emission Re	port	Annually	
	1	1 1		1 1

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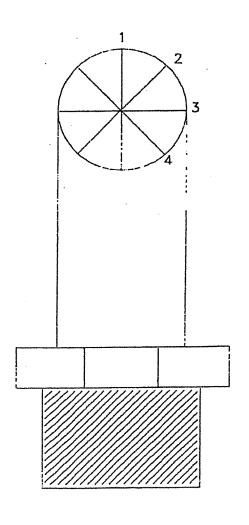
(F.16.36.3)

Nozzle Calibration

Date: 4/16/02

Nozzle ID No.: N/A

Analyst: A. Robinson



Pre Test		Post Test
0.373	1	\checkmark
0.372	2	\checkmark
0.371	3	
0.372	4	\checkmark
		•
		= 1
Average		

Average

0.372

ANALYTICAL BALANCE ACCURACY CHECK

Weight Set #100	Calibration	Torbal Balance	Sartorius Balance	Sartorius Balance
	Weights*	EA-1	A210P	1702
100 g	100.0006	<u> </u>	100:0004	100.0001
50 g	50.0002	49,9997	49.9998	50,0001
30 g	30.0000	29.9999	30.0002	30.0000
20 g	20.0000	20.0000	20.0001	20.0000
10g	10.0000	10.0000	9.4999	10.0000
. 5g ;	5.0000	5,0002	5.0001	5.0000
3 g	3.0000	3,0000	3.0000	3.0000
1 g	1.0000	1.0000	1.0000	1.0004
0.500 g	0.5000	0,5003	0,4998	0.4999
0.300 _. g	0.3000	0.3000	0.2999	0.2999
0.200 g	0.2000	0.2000	0.1998	0. 2000
0.100 g	0.1000	0.1000	0,1000	0.1000
0.050 g	0.0500	0.0497	0,0499 -	0.0500
0.030 g	0.0300	0.0297	0.0299 .	0.0299
0.020 g	0.0200	0.0202	0.0202 -	0,0200

Analyst: E. VOLOMARSKY Date: 04, 15.02

Note: Each weight must be within 0.5 mg of the mass determined on the 10/10/01 calibration.

Torbal: Model EA-1, Serial No. 168491. Sartorius: Model A210P, Serial No. 3710004. Sartorius: Model 1702, Serial No. 3502267

C-VENERALDEN PRODUCTION FRM

Revised: 12/17/01

^{*} Calibration by M and R Balance Service, Chicago, Illinois 10/10/01.

What value do you want to use? F = 9,780 F = 1,800 Other =

Circle to indicate "Yes" or add other value if not given.

TEST RUN NO.

THIMBLE NO: TARE WT: TAR	TOTAL NUMBER OF TRAVERSE ON TOTAL NUMBER OF TRAVERSE ON: CO ₂ : 0 O ₂ : 2c ₁ /5 O ₂ : 2c ₁ /5 AH@ SAMPLES REMOVED FROM SITE BY: For computer data entry: Supervisor, please coinplete. For computer data entry: Supervisor, please coinplete. For computer data entry: Supervisor, please coinplete. For computer data entry: Supervisor, please coinplete. For computer data entry: Supervisor, please coinplete. For computer data entry: Supervisor, please coinplete. For computer data entry: Supervisor, please coinplete.
	FINAL: 536 ml/gm FINAL WT: 221,9 gm GAIN: 66 ml/gm WT. GAIN: 221,9 gm GAIN: 66 ml/gm WT. GAIN: 6a. 4 gm TOTAL H2O COLLECTED: 2 DESCRIPTION OF IMPINGER H2O: SILICA GEL EXHÁUSTED?: IMPINGERS RECOVERED BY: SILICA GEL WEIGHED BY: COMMENTS & NOTES

PROCEDURE FOR DETERMINING PERCENT MOISTURE AT SATURATED CONDITIONS IN A SUPERSATURATED GAS STREAM

Determine the following parameters:

Barometric Pressure, P_{ter} Static Pressure, $P_{g} =$ "H₂O/13.6 =

Absolute Flue Gas Pressure, $P_{s} = P_{ter} + P_{g} =$ Average Flue Gas Temperature, t_{s} Saturated Vapor Pressure of Water at t_{s} , V.P.

Total Volume of Liquid Collected in impingers and silica gel by the condensation method, V_{te} Moisture Content determined by condensation method, percent by volume = $B_{ter} \times 100$ Dry Gas Sample Volume as measured by dry gas meter, corrected to standard conditions, V_{teres}

1. Theoretical maximum water vapor content, percent by volume, in a saturated gas stream % Moisture (saturated) = $\frac{V.P.}{P.} \times 100 = \frac{13.8}{9.00}$ %

2. Moisture content in the form of water droplets in the supersaturated gas stream, expressed here as percent by volume for the purpose of comparison

% Moisture (droplets) =
$$\left(B_{ws} \times 100\right)$$
 - % Moisture (saturated) = _____ %

3. Milliliters of actual collected condensate attributable to the theoretical saturation water vapor content of the gas stream

$$V_{lo} \text{ (saturated)} = \frac{\begin{pmatrix} V_{m(ab)} \\ 1 - \frac{\% \text{ Moisture (saturated)}}{100} \end{pmatrix} - V_{moisture}}{0.04707} = \underline{\qquad mis *}$$

*This number replaces V_b in all calculations involving supersaturated gas streams.

Water droplet concentration, using 1 milliliter H₂O = 1 gram

$$\frac{\left[V_k-V_k\;(\text{saturated})\right]\times 15.43}{\left[0.04707\times V_k\;(\text{saturated})\right]+V_{\text{inclust}}}=\text{grains/scf}$$

Rationale: When dealing with supersaturated gas streams as for example, after some scrubbers and certain water injection systems, the moisture that is not in the form of water vapor must be separated from that which is in the vapor state in order to correctly determine the volumetric gas flow rate at actual conditions. In these situations, the value for B_{vs} to be used in all calculations will be equal to the % Moisture (saturated) divided by 100. These calculations include those for all volumetric flow rates, wet molecular weight of the gas, pollutant concentrations and emission rates on a wet basis, and the isokinetic sampling rates and the final isokinetic variances. All additional moisture condensed in the impingers and collected in the silica gel is considered to be excess moisture attributable to water droplets, not water vapor in the gas stream.

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Form 1005-1

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@ GE Mostardi Platt

IEPA FOIA 0425

FIELD TEST DATA SHEET FOR ISOKINETIC SAMPLING

GE MOSTARDI PLATT

MXM NACME PROJECT / TEST RUN NO.

				•.									-		T		1	T	-	-7	Т			Ī					1	T		
_			Impinger	Temp. °F	79.	119	63	29	99	67	65	99	67	ζ,	99	65		65	67,	65	99	62	2	97	29	65	65	91	165			
25	OF.		Filter	Temp. °F	245	25-1	ングイン	351	457	کریم	25%	253	257	757	አያየ	255		758	257	75.9	194	227	25.8	159	258	240	25%	259	154			
_	-		Probe	emp.	1. 7.67	842	255	255	255	27	8-57	75%	258	LSt	654	257		259	252	251	1257	157	25%	25K	724	25.7	7.77	22	157	\vdash		-
ניט	FAGE			Notes		66.123	67.856	69.714	055.15	73.333	74.995	76.657	78,319	F1.873	61.127	87,866	54.705		86,109	Ehs'LB	28638	90.536	060.75	43.644	902'55	16.968	78,522	96.836	101:390	לסד: גסו	-	
70				£.	(763	1.733	1.858	1.856	1.763	人別!	7997	~ 99"1	HSS'1	1551	1.439	1,439		٠ ٨٤٤١	1.438	1. 439	11.554	1.55.4	1359	7997	J99"	1.534	1.317	1.554	1.314			
4-11.02	00	8,028	Pump	vacuum in. Hg	5	3	3	3	2	ک	3	3	3	3	3	3		7	۲	ኅ	4	4	7	Ą	æ	ュ	٦					
	3.35 G	1 _	Meter	cfm	0.705	2690	97V	5115	0.705	5990	2.665	0,665	7790	649.0	D. 576	0.776		229.0	7250	26.50	7790	490	779.0	0.665	599.0	0.02	0.525	2.622	0,535			
		mp. (t _m)		Outlet °F	258	. <i>8</i> S	35	Z	Z	82	83	85	9.8	9.8	93	%		85	83	88	48	8%	X	8	K	B	18	85	hs.	Corne		45. C.nu
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GE MOSTARDI PLATT TEST SUPPORT DATA

TEST RUN NO.

Ē in. Hg 60 10,1 **>** DOWNSTREAM: **@** וניו POST POST: 0,007 TARE WT: TARE WT: DIAMETER: べ What value do you want to use? F = 9,780 F, = 1,800 3d. ft. L Do you want to enter a fuel analysis? Y 🖂 🦮 📆 TOTAL NUMBER OF TRAVERSE POINTS. SAMPLES REMOVED FROM SITE BY: Cluss PRE: 0,000 For computer data eatry: Sapervisor, pl CALIBRATED NOZZLE DIAMETER: GAS ANALYSIS (ORSAT/FYRITE); BAROMETRIC PRESSURE in. Hg: NOZZLE IDENTIFICATION NO: PRE DISTURBANCE UPSTREAM: FLUE PRESSURE in. Hg ABS: PROBE LINER MATERIAL: カンソン MINUTES PER POINT: FLUE PRESSURE in. H₂O: PITOT LEAK CHECK; PROBE LENGTH: TEST LENGTH: DUCT SHAPE: LEAK CHECK: 20,9 DUCT AREA: THIMBLE NO: FILTER NO: ΔH@ ő £3% FINAL WT: 209, 2 203.5 Ë SILICA GEL: INITIAL WT: POT. NO.: WT. GAIN: -.0 Scrubbu 0.836 abinsor DESCRIPTION OF IMPINGER H₂O: ml/gm ml/gm mVgm METER CALIBRATION FACTOR: IMPINGERS RECOVERED BY: NACME コンエ SILICA GEL EXHAUSTED?: PITOT TUBE COEFFICIENT: Chicaso E38 ひふてり E38 SILICA GEL WEIGHED BY: んの-91 -ご TOTAL HO COLLECTED: WALIN & COMMENTS & NOTES حرفا 553 250 CONTROL BOX: **FEST LOCATION:** PORT LANGTH: IMPINGER HAO PITOT ID NO.: PORT TYPE: METER NO.: PORT SPZE: OPERATOR: COMPANY: INITIAL: CLIENT FINAL: DATE: GAIN: PLANT:

Circle to indicate "Yes" or add other valus if not given.

	Test No.	ن
Customer Nacms		
1 de la Sandahor Start		

PROCEDURE FOR DETERMINING PERCENT MOISTURE AT SATURATED CONDITIONS IN A SUPERSATURATED GAS STREAM

Determine the following parameters: Barometric Pressure, P Absolute Flue Gas Pressure, P. = Pber + Pa = Average Flue Gas Temperature, t, 4.065 THE Saturated Vapor Pressure of Water at t., V.P. Total Volume of Liquid Collected in impingers 108.70mis and silica gel by the condensation method, $V_{\scriptscriptstyle to}$ Moisture Content determined by condensation method, percent by volume = $B_{ws} \times 100$ Dry Gas Sample Volume as measured by dry gas meter, 36,653# corrected to standard conditions, $V_{\text{tn(ed)}}$

1. Theoretical maximum water vapor content, percent by volume, in a saturated gas stream

% Moisture (saturated) =
$$\frac{\text{V.P.}}{P_s} \times 100 = \frac{13.8}{9}$$
%

2. Moisture content in the form of water droplets in the supersaturated gas stream, expressed here as percent by volume for the purpose of comparison

% Moisture (droplets) =
$$\left(B_{\text{WS}} \times 100\right)$$
 - % Moisture (saturated) = _____ %

3. Milliliters of actual collected condensate attributable to the theoretical saturation water vapor content of the gas stream

$$V_{lo} \text{ (saturated)} = \frac{\left(\frac{V_{uijad)}}{1 - \frac{\% \text{ Moisture (saturated)}}{100}\right) - V_{uijad)}}{0.04707} = \frac{\text{mbs}}{}$$

*This number replaces V_k in all calculations involving supersaturated gas streams.

Water droplet concentration, using 1 milliliter H₂O = 1 gram

$$\frac{\left[V_{le}-V_{le} \text{ (saturated)}\right] \times 15.43}{\left[0.04707 \times V_{le} \text{ (saturated)}\right] + V_{m(set)}} = \text{grains/scf}$$

Rationale: When dealing with supersaturated gas streams as for example, after some scrubbers and certain water injection systems, the moisture that is not in the form of water vapor must be separated from that which is in the vapor state in order to correctly determine the volumetric gas flow rate at actual conditions. In these situations, the value for B, to be used in all calculations will be equal to the % Moisture (saturated) divided by 100. These calculations include those for all volumetric flow rates, wet molecular weight of the gas, pollutant concentrations and emission rates on a wet basis, and the isokinetic sampling rates and the final isokinetic variances. All additional moisture condensed in the impingers and collected in the silica gel is considered to be excess moisture attributable to water droplets, not water vapor in the gas stream.



Illinois Environmental Protection Agency

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 – (217) 782-3397 JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

217/785-5151

ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR CAAPP APPLICATION COMPLETENESS DETERMINATION AND SOURCE FEE DETERMINATION

APPLICANT

NACME Steel Processing, LLC Attn: William Reichel 429 West 127th Street Chicago, Illinois 60628

Date of Determination: December 6, 2005

Application/Permit No.: 05100052

I.D. Number:

031600FWL

Date Received:

October 25, 2005

Source Name:

NACME Steel Processing, LLC

Location of Source:

429 West 127th Street, Chicago, 60628

Dear Mr. Reichel:

This letter provides notification that your Clean Air Act Permit Program (CAAPP) application received on the date indicated above, has been determined by the Agency to be complete pursuant to Section 39.5(5) of the Illinois Environmental Protection Act (Act).

As provided in Section 39.5(18) of the Act, a CAAPP source shall pay a fee. Attached is the annual fee bill for this CAAPP source as determined from information included in your application, on form 292-CAAPP - FEE DETERMINATION FOR CAAPP PERMIT. Payment of the fee is due within 45 days of the billing date indicated on the billing statement.

Notwithstanding the completeness determination, the Agency may request additional information necessary to evaluate or take final action on the CAAPP application. 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 Agency the requested information within the time frame specified by the Agency, may force the Agency to deny your CAAPP application pursuant to Section 39.5 of the Act.

If you have any questions regarding this matter, please contact the Division of Air Pollution Control Permit Section at 217/785-5151.

Sincerely,

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

DES:YMC:psj

Enclosure(s)

இதை இத்து ROCKFOKD上級出入 INVOING BERT Elgin, IL 60123 — (847) 608-3131 ・ PEORIA — 5415 N. University St., Peoria, IL 61614 — (309) 693-5463

A FUN 594 South Sata Elgin, IL 60123 — (847) 608-3131 ・ PEORIA — 5415 N. University St., Peoria, IL 61614 — (309) 693-5463

U OF LAND - PEORIA — 7620 N. University St., Peoria, IL 61614 — (309) 693-5462 ・ CHAMPAIGN — 2125 South First Street, Champaign, IL 61820 — (217) 278

SPRINGFIELD UNDER SATUREST RESTRIBUTED TO COLLINSVILLE — 2009 Mall Street, Collinsville, IL 62234 — (618) 346-5120 _ CHAMPAIGN - 2125 South First Street, Champaign, IL 61820 - (217) 278-5800 MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 13 - 12) (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,)
Respondent.)

EXHIBIT F

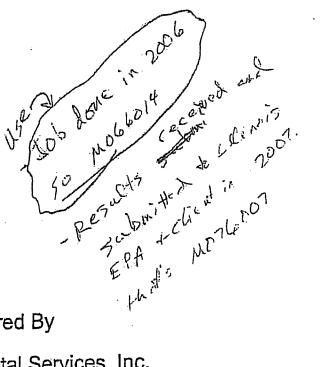
THOMAS J. REUTER AFFIDAVIT

TAB 12
DECEMBER 21, 2006, HYDROGEN
CHLORIDE EMISSIONS TEST REPORT
("DECEMBER 2006 STACK TEST
REPORT")

371 Balm Court Wood Dale, IL 60191 630-521-9400 630-521-9494 fax

Hydrogen Chloride Emissions Test Report

Nacme Steel Processing, LLC
Steel Pickling Line HCl Scrubber Exhaust Stack
Chicago, Illinois
December 21, 2006



Prepared By

Platt Environmental Services, Inc.

Report No. PE2006234

TABLE OF CONTENTS

	•
INTRODUCTION	. * * * * * * * * * * * * * * * * * * *
EXECUTIVE SUMMARY	
TEST METHODOLOGY	م. - د د د د د د د د د د د د د د د د د د د
Method 1 (40 CFR, Part 60, Appendix A)	
Method 26A (40 CFR, Part 60, Appendix A)	
PROCESS DATA	E
PROCESS DATA	7
CONCLUSION AND CERTIFICATION	*************************
APPENDIX	_
APPENDIX Plant Operating Data Test Section Diagram	
Test Section Diagram	
Test Section Diagram	
Laboratory Sample AnalysisReference Method Test Data (Computerized Sheets)	25
Calibration DataField Data Sheets	4(
Field Data Sneets	

PESI Project No.: PE2006234 December 21, 2006

Introduction

PLATT ENVIRONMENTAL SERVICES, INC. (PESI) conducted a hydrogen chloride (HCI) emissions test program for Nacme Steel Processing, LLC on December 21, 2006. This report summarizes the results of the test program and test methods used.

The test location, test date and test parameters are summarized below.

Test Overview

Test Location	Test Date	Test Parameters
Steel Pickling Line HCl Scrubber Exhaust Stack	December 21, 2006	USEPA Methods 1, 2, 3, 26A, 40CFR60, Appendix A

The test program was conducted by PESI personnel. The identification of individuals associated with the test program, are summarized below.

Location	Address	Contact
Test Facility	Nacme Steel Processing, LLC 429 W. 127 th Street Chicago, IL 60628	Bill Riechel 773-291-1301 (phone)
Testing Company Representative	Platt Environmental Services, Inc. 371 Balm Court Wood Dale, IL 60191	Chris Jensen 630-521-9400 (phone) cjensen@plattenv.com

The test crew consisted of Messrs. Larry Sorce, Dan Tuider, and Chris Jensen of PESI. The purpose of the test program was to demonstrate compliance with applicable emissions limits listed in Table 1.

Mr. Marcus Hatch from the Illinois Environmental Protection Agency observed the testing.

PESI Project No.: PE2006234 December 21, 2006

Executive Summary

Selected results of the test program are summarized below, in Table 1. A complete summary of emission test results, for each location, follows the narrative portion of this report, in the tables following.

Table 1
Test Results

		Emission Rate	Emission Limit
Test Location	Test Parameter	ppmvd	ppmvd
Steel Pickling Line HCl Scrubber	HCI	0.01	18.0
Exhaust Stack		1,	1

Test No. 1 failed the post-test leak check. A fourth test was performed and all emissions are based on Tests Nos. 2, 3, and 4.

Emissions are based on the HCl laboratory analysis of less then 0.02 milligrams for each of the three samples.

Test Methodology

Emissions testing was conducted following the methods specified in 40 CFR, Part 60, Appendix A. Schematics of the sampling trains used are included in the appendix. Copies of field data sheets and/or analyzer print-outs for each test run are included in appendix.

The following methodologies were used during the test program:

Method 1 (40 CFR, Part 60, Appendix A)

Test measurement points were selected in accordance with Method 1. The characteristics of each measurement location are summarized below, in Table 4.

Table 2
Sample Point Selection

Location	Upstream Diameters	Downstream Diameters	Test Parameter	Number of Sampling Points
		3	Method 26A	24
HCI Scrubber Stack	3	ت ت	14100100 2011	1

Method 2 (40 CFR, Part 60, Appendix A)

Gas velocity was measured following Method 2, for purposes of calculating stack gas volumetric flow rate. An S-type pitot tube, differential pressure gauge, thermocouple and temperature readout were used to determine gas velocity at each sample point. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data is presented in the appendix.

Method 3 (40 CFR, Part 60, Appendix A)

Stack gas molecular weight was determined in accordance with Method 3. An Orsat analyzer was used to determine stack gas oxygen and carbon dioxide content and, by difference, nitrogen content. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data is presented in the appendix.

Method 26A (40 CFR, Part 60, Appendix A)

Stack gas hydrogen chloride (HCI) concentrations and emission rates were determined in accordance with Method 26A.

An Environmental Supply Company sampling train was used to sample stack gas, in the manner specified in the Method. TEI Analytical of Niles, Illinois conducted analyses of the samples collected. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data is presented in the appendix.

Test Result Summaries

Company: Nacme Steel Processing, LLC Plant: Chicago Facility

Unit: HCl Scrubber Exhaust Stack

Source Condition Date Start Time End Time	12/21/06 13:11 14:17 Run 2	12/21/06 15:01 16:06 Run 3	Maximum 12/21/06 16:49 17:55 Run 4	Average
Sta	ck Condition	15.	naturent soom merkin	CONTROL CONTRO
Average (Gas Temperature)	44.09.04 kg	14.197.67展	/NE/97/6/M	FF 98 4
Flue Gas Moisture, percent by volume	5.9%	5.6%	5.6%	5.7%
PARTITION OF THE PROPERTY OF THE PARTITION OF THE PARTITI	01/201/37/5	29.43	29 43 40	###29V49
Gas Sample Volume, dscf	36.793	37.586	38,904	37.761
Average Gas Velocity it /sec	到15:812高	始约6.013 龄	加纳664 加	独加6 加63字
Gas Volumetric Flow Rate, acrim	6,706	6,791	7,068	6,855
PARTICIONAL DE LA COMPANIO DEL COMPANIO DEL COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DEL COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DEL COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DEL COMPANIO DEL COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DEL COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DEL COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DE LA COMPANIO DEL COMPANION DEL COMPANION DEL COMPANIO DEL COMPANIO DEL CO	CARE STREET	探高978期	9/15/2/2/5	HEADING SERVICE
Average %CO ₂ by volume, dry basis	0.0	0.0	0.0	0.0
WWW.Avarage.%O. by volume, drybasis	2019)	20.9	沙沙2019外代	12019U
Isokinetic Variance	97.1	97.2	<u>9</u> 6.8	97.0
Total tons of Steel per Hour	114.750	113.305	131.940	119.998
	HCI			
ppm	0.01	0.01	0.01	0.01
μg/dscm	19.20	18.79	18.15	18.71
lb/hr	D.0004	0.0004	0,0004	0.0004
lbs.HCl/ton Steel	3.6693E-06	3,7106E-06	3.2018E-06	3.5272E-06

PESI Project No.: PE2006234 December 21, 2006

Process Data

Production data was recorded by Nacme Steel Processing, LLC personnel during each test run in order to correlate emission rates to production in accordance with permit conditions and applicable regulations. Production data is summarized below:

	,,,	1	
Test Run	Test Duration	Production Rate /	Units
2	66 minutes	114.750	Tons/hr
3	65 minutes	113.305	Tons/hr
	66 minutes	131.940	Tons/hr

Conclusion and Certification

PLATT ENVIRONMENTAL SERVICES, INC. is pleased to have been of service to Nacme Steel Processing, LLC. If you have any questions regarding this test report, please to not hesitate to contact us at 630-521-9400{phone number}.

CERTIFICATION

As project manager, I hereby certify that this test report represents and true and accurate summary of emissions test results and the methodologies employed to obtain those results, and the test program was performed in accordance with that methods specified in this test report.

PLATT ENVIRONMENTAL SERVICES

Chris Jen	
	Program Manager
Chris E. Jensen	
Jeffry M. Cinhue	
<i>V</i>	Quality Assurance
Jeffrey M. Crivlare	

PESI Project No.: PE2006234 December 21, 2006

APPENDIX

NPC - 1 Stack test 12/21/06

	1ST TEST		1st TEST	2nd TEST	3rd TEST
Start Time	101 1201	11:07 AM	1:00 PM	3:05 PM	4:45 PM
End Time		12:10 AM		4:15 PM	
Lbs of coils ran	Failed due to testing app	aratus	39000	37840	
CD9 of colig rain	Glass probe broke		38000	37770	37900
	Ciddo probo brono		38160	37930	37750
			38050	37570	51840
	•		38100	37710	45980
		* 1	38190	37790	52700
	•				
Total Tons per hour			114.75	113.305	131.94
LOTAL L'OLIS BOLLION			<u> </u>		

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NATIONAL PROCESSING COMPANY PICKLE LINE

PICKLE LINE DAILY PRODUCTION/INSPECTION REPORT

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NATIONAL PROCESSING COMPANY PICKLE LINE

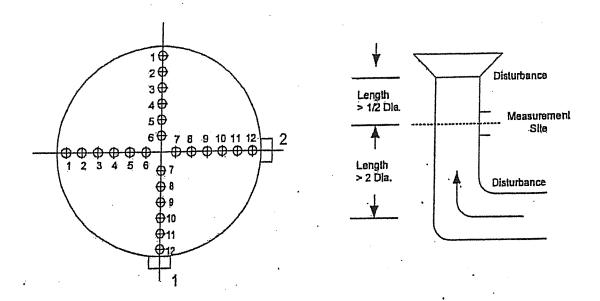
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DATE: DATE PROCESSING COMPANY PICKUE LINE PROBUCTION REPORT SHIFT: 3/1/	isis entid surto sales in	18 40 23 25 2000 15 200 25 999 - Bainted an 354 (18 19 19 19 19 19 19 19 19 19 19 19 19 19	3 She IW Kiniga Wayan Waya 1 6 231 236 CA TH BY 2302K HUBO COST HUBO SHOW 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	1/10196 1/14891/1784 1 0 379 328 11 (19 148 72025/4678) 10 311 311 " (49 75035/4678) 10 (311/1311 " (49 75035/4678) 10 (311/	HAND STORE S	
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EQUAL AREA TRAVERSE FOR ROUND DUCTS



Job: Nacme Steel Processing, LLC

Chicago, Illinois

Date: December 21, 2006

Unit: Steel Pickling Line

Test Location: Scrubber Stack

Stack Diameter: 36 Inches

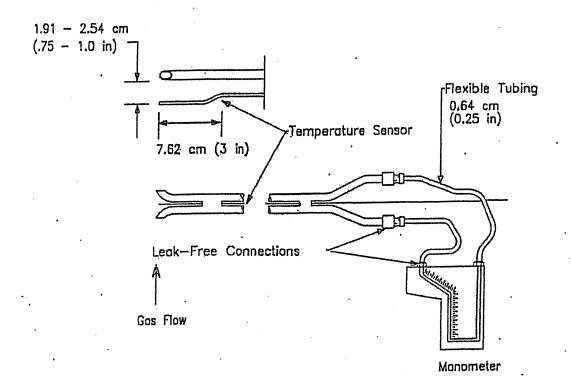
Stack Area: 7.069 Square Feet

No. of Points per Port: 12

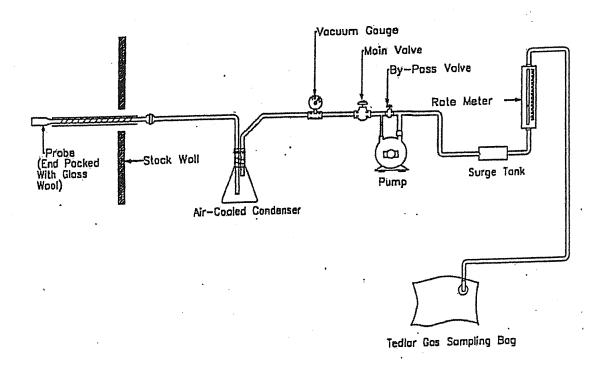
No. of Ports: 2

Port Length: 5 Inches

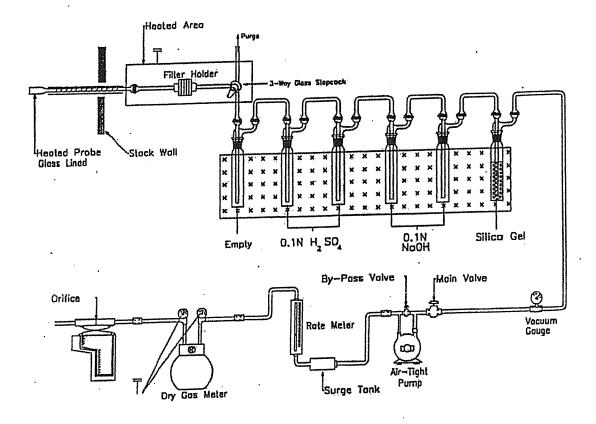
USEPA Method 2 - S-Type Pitot Tube Diagram



USEPA Method 3 - Integrated Oxygen/Carbon Dioxide Sample Train Diagram



USEPA Method 26A - Halogen Sample Train Diagram



Ice Both
Temperature
Sensor

Calculations For Hydrogen Chloride By Method 26 or 26A

Concentration

$$\frac{1\text{bs HCl}}{\text{dscf}} = \frac{\mu \text{g HCl in sample}}{4.536 \times 10^8 \times \text{dscf}}$$

where:

$$4.536 \times 10^8 = \mu g/lb$$

dscf = Volume of gas sampled

$$\mu g/lb HCl = \mu g Cl \times \frac{36.453}{35.453}$$

Parts Per Million

$$ppm HCl = \frac{1bs HCl}{dscf} \cdot \frac{36.453}{385 \times 10^6}$$

where:

385 = Volume of 1 lb mole of gas at 68°F and 29.92 in. Hg 10^6 = Conversion of ppm v/v

Emission Rate

lbs HCl/dscf × dscfm × 60 min/hr = lbs/hr HCl

Particulates Calculation Formulas

1.
$$V_{w(\text{std})} = V_{\text{lc}} \left(\frac{\rho_w}{M_w} \right) \left(\frac{RT_{\text{std}}}{P_{\text{std}}} \right) = K_2 V_{\text{lc}}$$

$$2. \ \ V_{m(std)} = V_{ni} Y \left(\frac{T_{std}}{T_{m}} \right) \left(\frac{(P_{bar} + (\frac{\Delta H}{13.6}))}{P_{std}} \right) = K_{1} V_{m} Y \frac{(P_{bar} + (\frac{\Delta H}{13.6}))}{T_{m}}$$

3.
$$B_{ws} = \frac{V_{w(std)}}{(V_{m(std)} + V_{w(std)})}$$

4.
$$M_d = 0.44(\%CO_2) + 0.32(\%O_2) + 0.28(\%N_2)$$

5.
$$M_s = M_d (1 - B_{ws}) + 18.0 (B_{ws})$$

6.
$$C_{n} = \frac{m_{n}}{V_{n}\rho_{n}}$$

7.
$$W_a = C_a V_{aw} \rho_a$$

8.
$$C_{noi} = 15.43 K_i \left(\frac{m_n P_s}{V_{w(std)} + V_{ru(std)}} T_s \right)$$

9.
$$C_s = (15.43 \text{ grains/gram}) (m_n/V_{m(std)})$$

10.
$$v_s = K_p C_p \sqrt{\frac{\Delta P T_s}{P_s M_s}}$$

11.
$$Q_{acim} = v_s A(60_{sec/min})$$

12.
$$Q_{sd} = (3600_{sec/hr})(1 - B_{ws}) v_s \left(\frac{T_{sld}P_s}{T_sP_{sld}}\right) A$$

13. E (emission rate, lbs/hr) =
$$Q_{std}(C_s/7000 \text{ grains/lb})$$

14. IKV =
$$\frac{T_s V_{m(std)} P_{std}}{T_{std} V_s \theta A_n P_s 60 (1 - B_{ws})} = K_4 \frac{T_s V_{m(std)}}{P_s V_s A_n \theta (1 - B_{ws})}$$

15. %EA =
$$\left(\frac{\%O_2 - (0.5 \%CO)}{0.264 \%N_2 - (\%O_2 - 0.5 \%CO)}\right) \times 100$$

Volumetric Flow Nomenclature

A = Cross-sectional area of stack or duct, ft2

B_{ws} = Water vapor in gas stream, proportion by volume

Cn = Pitot tube coefficient, dimensionless

Ma = Dry molecular weight of gas, lb/lb-mole

M_s = Molecular weight of gas, wet basis, 1b/lb-mole

Mw = Molecular weight of water, 18:0 lb/lb-mole

Phar = Barometric pressure at testing site, in. Hg

P_g = Static pressure of gas, in. Hg (in. H₂O/13.6)

 $P_i = Absolute pressure of gas, in. Hg = P_{bar} + P_B$

 $P_{std} = Standard$ absolute pressure, 29.92 in. Hg

Q_{actin} = Actual volumetric gas flow rate, acfm

Q_{sd} = Dry volumetric gas flow rate corrected to standard conditions, dscl/hr

R = Ideal gas constant, 21.85 in. Hg-ft³/°R-lb-mole

T. = Absolute gas temperature, °R

T_{sid} = Standard absolute temperature, 528°R

v. = Gas velocity, ft/sec

 $V_{w(sid)} = V$ olume of water vapor in gas sample, corrected to standard conditions, sef

Y = Dry gas meter calibration factor

Δp = Velocity head of gas, in. H₂O

K₁ = 17.647 °R/in. Hg

%EA = Percent excess air

%CO2 = Percent carbon dioxide by volume, dry basis

%O₂ = Percent oxygen by volume, dry basis

%N2 = Percent nitrogen by volume, dry basis

0.264 = Ratio of O_2 to N_2 in air, v/v

0.28 = Molecular weight of N2 or CO, divided by 100

0.32 = Molecular weight of O2 divided by 100

0.44 = Molecular weight of CO2 divided by 100

13.6 = Specific gravity of mercury (Hg)

Volumetric Air Flow Calculations

$$Vm (std) = 17.647 \times Vm \times \left[\frac{(P_{bar} + (\frac{DH}{13.6}))}{(460 + Tm)} \right] \times Y$$

 $Vw (std) = 0.0471 \times Vlc$

$$Bws = \left[\frac{Vw (std)}{Vw (std) + Vm (std)} \right]$$

$$Md = (0.44 \times \%CO_2) + (0.32 \times \%O_2) + [0.28 \times (100 - \%CO_2 - \%O_2)]$$

$$Ms = Md \times (1 - Bws) + (18 \times Bws)$$

$$V_{S} = \sqrt{\frac{(T_{S} + 460)}{M_{S} \times P_{S}}} \times \sqrt{DP} \times C_{P} \times 85.49$$

Acfm = Vs x Area (of stack or duct) x 60

Scfm = Acfm × 17.647 ×
$$\left[\frac{Ps}{(460 + Ts)}\right]$$

$$Sofh = Sofin \times 60 \frac{\min}{hr}$$

acfm = actual cubic feet per minute scfm = standard cubic feet per minute scfh = standard cubic feet per hour

Cp = pitot tube correction factor
Ps = absolute flue gas pressure

Ms = molecular weight of gas (lb/lb mole)

Md = dry molecular weight of gas (lb/lb mole)

Bws = water vapor in gas stream proportion by volume

ABUKATUKT KEPUKT



TEI Analytical, Inc. 7177 N. Austin Niles, IL 60714-4617 B47-647-1345

PREPARED FOR:

PAGE 1 of 1

Jim Platt

Platt Environmental Services Inc.

371 Balm Court

Wood Dale, IL 60191

Report #:

73870

1/8/2007

Report Date: Sample Received: 12/28/06

13:37

PE2006234

TEI Number	Sample	Chlorine (M26A) mg	Date Performed
73870	001 NaOH	<0.02	1/4/2007
73871	002 NaOH	<0.02	1/4/2007
73872	003 NaOH	<0.02	1/4/2007
73873	005 NaOH Blank	<0.02	1/4/2007

TEI Number	Sample	HCI (M26A) mg	Date Performed
73866	001 H2SO4	<0.02	1/4/2007
73867	002 H2SO4	<0.02	1/4/2007
73868	003 H2SO4	<0.02	1/4/2007
73869	004 H2SO4 Blank	<0.02	1/4/2007

Gayle E. O'Neill, Ph.D.

Platt Environmental Services, Inc

		Chain-of-Cu	stody	Form					
Project N	Number: PE2	006234	Date	Resuits I	Required:				
	acme Steel		TAT Required:						
		Chicago Plant / HCl Scrubber Stack	Proje	ct Super	visor: C. J	ensen			
Sample	Sample	Sample Point Identification		# of Conts	Sub Lab	Analysis Required	Volume, mis		
Number	Date 12/12/06	Test #2		2		Method 26A			
0.01		Test #3		2		Method 26A			
002	12/21/06	Test #4		2		Method 26A			
003	12/21/06	1 est #4	<u> </u>						
004	<u> </u>								
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	i to Lab by:	Date/Time: Received by: D	ate/Timi	ə: 	Proces	sed by: . Date/Tin	it.		

Laboratory Notes:

Customer: Nacme Steel Processing, LLC

Plant: Chicago Facility

Location: HCI Scrubber Exhaust Stack

12/21/06 Date: Start Time:

End Time:

11:08 12:14

STACK CONDITIONS

DAY OVER METE	D COMPITU	DNS		SINON	,0,10,1,10,1	
DRY GAS METE AH: Meter Temperature, Tm: Sort AP:	0.97 0.96 00.6 0.258	in. H₃O *F in. H₂O		Baromatric Pressure (Pb): Static Pressure: Flue Pressure (Ps):	29,40 0,40 29,43	in. Hg. in. H₂O in. Hg. abs.
Stack Temperature, Ts: Meter Volume, Vm: Meter Volume, Vmstd: Meter Volume, Vwstd: Meter Volume, Vwstd: Isokinetic Variance:	97.8 35.500 35.108 2,412 98.4	"F ft" dscf wscf %		Carbon Dioxide: Oxygen: Nilrogen: Gas Weight dry, Md: Gas Weight wat, Ms:	20.9 79.1 28.836 28.175	% % fb/fb mote ib/fb mote
Sample Train Pre 0 Post fait	Leak Check (13 @ (13 @ Checks	s 10 oak Check	in Hg. in Hg. @ 3 in, H2O?	Excess Air Volumetric Flow: Volumetric Flow: Valumetric Flow:	15.181 8,439 5,830	% (ps pc/m dec/m sc/m
Post yes			MOISTURE DET	FRMINATION		

			Silica Initial Wt.	0	grams	
Initial Impinger Content:	3893.6	m	Silice Final WL	n	orams	
Final Impinger Content:	3744.8	ml		ñ		
Difference	512		Dillerance:	u		

Port- Point No. Time			Dilierence:	51.2		N/	lolsture, Bws:	0.084		Supersaluirallo	n Value, Bws:	0.081*
Polit No. Time In. H20 In. H	Port-	Clock	Velocity Head ∆D	ΔH	Meter Vol.	SqrL	Stack Temp	Mete: inlet	r Temp Outlet	Pump Vacuum	Collected Vol.	Point Val
1.1 11:06:00 0.07 0.99 71:07:20 0.265 98 57 55 3.0 1.480 15:583 2 11:13:00 0.07 0.99 74:050 0.285 97 59 66 3.0 1.490 15:583 3 11:13:00 0.07 0.99 75:540 0.285 97 61 56 3.0 1.480 15:583 5 11:18:00 0.07 0.99 77:030 0.285 97 62 56 3.0 1.480 15:583 5 11:28:00 0.08 0.89 78:510 0.245 97 63 56 3.0 1.420 14.427 7 11:28:30 0.08 0.89 81:350 0.245 98 84 57 3.0 1.420 14.427 8 11:28:00 0.06 0.89 82:780 0.245 98 65 57 3.0 1.430 14.427 9 11:28:00	Point No.	,			·			55	55	3.0	1.488	15.583
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10 11:30:30 0.07 0.99 84:200 0.285 99 0.5 58 3.0 1.840 16.659 11 11:39:00 0.00 1.19 65.68 0.283 90 66 58 3.0 1.779 17.689 12 11:35:30 0.09 1.34 87.32 0.300 100 88 58 3.0 1.779 17.689 11:38:00 89.099 2-1 11:44:00 0.07 0.99 88.099 0.285 98 82 58 3.0 1.491 15.583 2 11:48:30 0.07 0.99 90.590 0.285 98 82 58 3.0 1.490 15.583 3 11:49:00 0.08 1.19 92.080 0.283 98 85 58 3.0 1.640 16.659 4 11:51:30 0.07 0.99 93.720 0.285 98 85 59 3.0 1.490 15.583 5 11:54:00 0.08 0.89 95.210 0.245 98 85 59 3.0 1.420 14.427 8 11:56:30 0.08 0.89 96.630 0.245 97 85 59 3.0 1.420 14.427 7 11:59:00 0.08 0.89 98.050 0.245 98 85 59 3.0 1.420 14.427 8 12:01:30 0.08 0.89 98.050 0.245 98 85 59 3.0 1.420 14.427 9 12:04:00 0.08 0.89 99.470 0.245 99 86 59 3.0 1.420 14.427 10 12:06:30 0.08 0.89 102.31 0.245 99 86 59 3 1.420 14.427 11 12:09:00 0.08 0.89 102.31 0.245 99 86 59 3 1.420 14.427 11 12:09:00 0.08 0.89 102.31 0.245 99 86 59 3 1.420 14.427 11 12:09:00 0.08 0.89 102.31 0.245 99 86 59 3 1.420 14.427 11 12:09:00 0.08 0.89 102.31 0.245 99 86 59 3 1.420 14.427 11 12:09:00 0.08 0.89 103.73 0.245 99 86 59 3 1.420 14.427 11 12:09:00 0.08 0.89 103.73 0.245 99 86 59 3 1.420 14.427 11 12:09:00 0.08 0.89 103.73 0.245 99 86 59 3 1.420 14.427	9	11:28:00	0:06									15,583
11 11:39:00 0.00 1.19 85.68 0.283 99 00 1.779 17.689 12 11:35:30 0.09 1.34 87.32 0.300 100 68 58 3.0 1.779 17.689 11:38:00 89.099 0.265 98 62 58 3.0 1.491 15.583 2-1 11:48:30 0.07 0.99 90.590 0.265 98 63 58 3.0 1.490 15.583 2 11:48:30 0.07 0.99 90.590 0.283 96 63 58 3.0 1.640 16.659 3 11:49:00 0.08 1.49 92.080 0.283 96 95 58 3.0 1.640 16.659 4 11:51:30 0.07 0.99 93.720 0.285 98 85 59 3.0 1.490 15.563 4 11:56:30 0.08 0.89 95.210 0.245 98 85 59 3.0 1.420 14.427 8 11:56:30	10	11:30:30	0.07	0.99	1					-		16.659
12 11:35:30 0.09 1.34 87.32 0.300 100 0.00 0.00 1.491 15:583 2.1 11:48:00 0.07 0.99 89.099 0.265 98 63 58 3.0 1.490 15:583 2 11:48:30 0.07 0.99 90.590 0.265 98 63 58 3.0 1.490 15:583 3 11:49:00 0.08 1.19 92.080 0.283 98 65 58 3.0 1.640 16.659 4 11:51:30 0.07 0.99 93.720 0.265 98 65 59 3.0 1.490 15.563 4 11:51:30 0.07 0.99 93.720 0.265 98 65 59 3.0 1.490 15.563 5 11:51:30 0.08 0.89 95.210 0.245 98 65 59 3.0 1.420 14.427 8 11:56:30 0.08 0.89 96.630 0.245 98 85 59 3.0 1.420	11 .	11:39:00	0.08	1.19								17.689
2-1 11:44:00 0.07 0.99 89.099 0.265 98 62 58 3.0 1.491 15:583 2 11:48:30 0.07 0.99 90.590 0.265 98 63 58 3.0 1.490 15:583 3 11:49:00 0.08 1.19 92.080 0.283 98 85 58 3.0 1.640 16.659 4 11:51:30 0.07 0.99 93.720 0.285 98 85 59 3.0 1.490 15.583 5 11:54:00 0.08 0.89 95.210 0.285 98 85 59 3.0 1.420 14.427 5 11:56:30 0.08 95.210 0.245 98 85 59 3.0 1.420 14.427 8 11:56:30 0.08 0.89 96.630 0.245 98 85 59 3.0 1.420 14.427 7 11:59:00 0.08	12	11:35:30	0.09	1.34		0.300	100	60		1		
2-1 11:44:00 0.07 0.99 89.099 0.265 98 63 58 3.0 1.490 15.583 2 11:48:30 0.07 0.99 90.590 0.285 98 63 58 3.0 1.490 15.583 3 11:49:00 0.08 1.19 92.080 0.283 98 85 58 3.0 1.640 16.659 4 11:51:30 0.07 0.99 93.720 0.285 98 85 59 3.0 1.490 15.583 5 11:54:00 0.08 0.89 95.210 0.245 98 85 59 3.0 1.420 14.427 8 11:56:30 0.08 0.89 96.630 0.245 97 85 59 3.0 1.420 14.427 7 11:59:00 0.06 0.89 99.050 0.245 98 86 59 3.0 1.420 14.427 8 12:01:30		11:38:00						ná	ED	3.0	1,491	15.583
2 11:48:30 0.07 0.99 90.590 0.265 98 63 30 1.640 16.659 3 11:49:00 0.08 1.19 92.080 0.283 98 65 58 3.0 1.640 16.659 4 11:51:30 0.07 0.99 93.720 0.265 98 65 59 3.0 1.490 15.583 5 11:54:00 0.08 0.89 95.210 0.245 98 65 59 3.0 1.420 14.427 8 11:56:30 0.08 0.89 96.630 0.246 97 85 59 3.0 1.420 14.427 7 11:59:00 0.06 0.89 98.050 0.245 98 85 59 3.0 1.420 14.427 8 12:01:30 0.06 0.89 99.470 0.245 99 86 59 3 1.420 14.427 9 12:04:00 0.08 0.89 100.89 0.245 99 86 59 3 1.420 14.427<	2-1	11:44:00	0.07	0.99	89.099							
3 11:49:00 0.08 1.19 92.080 0.283 98 85 38 3.0 1.59 4 11:51:30 0.07 0.99 93.720 0.285 98 85 59 3.0 1.490 15.583 5 11:56:30 0.08 0.89 95.210 0.245 98 85 59 3.0 1.420 14.427 8 11:56:30 0.08 0.89 96.630 0.245 97 85 59 3.0 1.420 14.427 7 11:59:00 0.08 0.89 98.050 0.245 98 85 59 3.0 1.420 14.427 8 12:01:30 0.08 0.89 99.470 0.245 99 86 59 3 1.420 14.427 9 12:04:00 0.08 0.89 100.89 0.245 99 86 59 3 1.420 14.427 10 12:06:30 0.08 0.8	2	11:48:30	0.07	0,99	90,590							
4 11:51:30 0.07 0.99 93.720 0.285 98 .65 59 3.0 1.420 14.427 5 11:54:00 0.08 0.89 95.210 0.245 98 85 59 3.0 1.420 14.427 8 11:56:30 0.08 0.89 96.630 0.245 97 85 59 3.0 1.420 14.427 7 11:59:00 0.06 0.89 98.050 0.245 98 86 59 3.0 1.420 14.427 8 12:01:30 0.06 0.89 99.470 0.245 99 86 59 3.0 1.420 14.427 9 12:04:00 0.08 0.89 100.89 0.245 99 86 59 3 1.420 14.427 10 12:06:30 0.08 0.89 102.31 0.245 99 86 59 3 1.420 14.427 11 12:09:00 <t< td=""><td></td><td>11:49:00</td><td>0.08</td><td>1.19</td><td>92,080</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></t<>		11:49:00	0.08	1.19	92,080							
5 11:54:00 0.08 0.89 95.210 0.245 98 85 59 3.0 1.420 14.427 5 11:56:30 0.08 0.89 96.630 0.245 97 85 59 3.0 1.420 14.427 7 11:59:00 0.08 0.89 98.050 0.245 88 85 59 3.0 1.420 14.427 8 12:01:30 0.06 0.89 99.470 0.245 99 86 59 3.0 1.420 14.427 9 12:04:00 0.08 0.88 100.89 0.245 99 86 59 3 1.420 14.427 10 12:06:30 0.08 0.89 102.31 0.245 99 86 59 3 1.420 14.427 11 12:09:00 0.08 0.89 103.73 0.245 99 86 59 3 1.420 14.427 12 12:11:30		11:51:30	0.07	0.99	93.720	0.285			-	1		
8 11:56:30 0.08 0.89 96:630 0.245 97 85 59 3.0 1.420 14.427 7 11:59:00 0.08 0.89 98:050 0.245 98 85 59 3.0 1.420 14.427 8 12:01:30 0.06 0.89 99:470 0.245 99 86 59 3 1.420 14.427 9 12:04:00 0.08 0.89 100.89 0.245 99 86 59 3 1.420 14.427 10 12:06:30 0.08 0.89 102.31 0.245 99 86 59 3 1.420 14.427 11 12:09:00 0.08 0.89 103.73 0.245 99 86 59 3 1.420 14.427 12 12:11:30 0.08 0.89 105.15 0.245 99 86 59 3 1.422 14.427			0.06	0.89	95.210	0.245						
7 11:59:00 0.06 0.89 98.050 0.245 98 85 59 3.0 1.420 14.427 8 12:01:30 0.06 0.89 99.470 0.245 99 86 59 3.0 1.420 14.427 9 12:04:00 0.08 0.89 100.89 0.245 99 66 59 3 1.420 14.427 10 12:06:30 0.08 0.69 102.31 0.245 99 66 59 3 1.420 14.427 11 12:09:00 0.08 0.89 103.73 0.245 99 86 59 3 1.420 14.427 12 12:11:30 0.08 0.89 105.15 0.245 99 86 59 3 1.420 14.427		 	0.08	0.89	96.630	0.245				-		
8 12:01:30 0.08 0.89 99.470 0.245 99 86 59 3.0 1.420 14.427 9 12:04:00 0.08 0.89 100.89 0.245 99 68 59 3 1.420 14.427 10 12:06:30 0.08 0.89 102.31 0.245 99 86 59 3 1.420 14.427 11 12:09:00 0.08 0.89 103.73 0.245 99 86 59 3 1.420 14.427 12 12:11:30 0.08 0.89 105.15 0.245 99 86 59 3 1.420 14.427		1	0.08	0.89	98.050	0.245	98			-		
9 12:04:00 0.0B 0.8B 100.89 0.245 99 68 59 3 1,320 14,427 10 12:06:30 0.0B 0.6B 102.31 0.245 99 66 59 3 1,420 14,427 11 12:09:00 0.0B 0.8B 103.73 0.245 99 86 59 3 1,420 14:427 12 12:11:30 0.0B 0.8B 105.15 0.245 99 86 69 3 1,422 14.427				0.89	99,470	0.245	.99	86		-		
10 12:06:30 0.08 0.89 102.31 0.245 99 68 59 3 1.420 14.427 11 12:09:00 0.08 0.89 103.73 0.245 99 86 59 3 1.420 14.427 12 12:11:30 0.08 0.89 105.15 0.245 99 86 59 3 1.422 14.427		1		0.89	100.89	0:245	99	68				
11 12:09:00 0.08 0.89 103.73 0.245 99 86 59 3 1.420 14.427 12 12:11;30 0.06 0.89 105.15 0.245 99 88 59 3 1.422 14.427				0.89	102.31	0.245	99	66	.59			
12 12:11:30 0.08 0.89 105.15 0.245 99 68 59 3 1.422 14.427		1			103.73	0.245	99	86	59	3		
12 12:11:30 0:00		1			105.15	0.245	99	88	- 69	3	1.422	14,427
12:14:00	12	1			108,572							
		72:14:00										
		ļ <u>-</u> -			<u> </u>							

Customer: Nacme Steel Processing, LLC Plant: Chicago Facility

Location: HCl Scrubber Exhaust Stack

Date:

12/21/06

Start Time: End Time: 13:11 14:17

STACK CONDITIONS

DOV CAS METE	DRY GAS METER CONDITIONS					STACK CONDITIONS			
AH: Meter Temperature, Tm: Sqrl AP; Stack Temperature, Ts: Stack Temperature, Ts: Meter Volume, Vm: Meter Volume, Vinstd: Meter Volume, Westd: Isokinatic Verlance: Sample Train Pre 0 Post 0 Pitol Leal	0.97 63.4 0.268 99.9 37.399 36.793 2.289 97.1 Leak Checks	In. H ₂ O *F In. H ₂ O *F cf dscf wscf %I 5	in Hg. In Hg. g 3 in. H2O?	Barometric Pressure (Pb): Stalic Pressure: Flue Pressure: Flue Pressure: Carbon Dloxide: Oxygen: Nitrogen: Gas Weight dry, Md: Gas Weight wet, Ms: Excess Air. Gas Velocity, Vs: Volumetric Flow: Volumetric Flow:	29,40 0,40 29,43 0,0 20,9 79,1 28,835 28,201	in. Hg. in. Hg. in. Hg. abs. % % % ib/lib mole ib/lib mole fps ac/m dsc/m			
Pro yes Posl yes	Performed L		g 3 In. H2O? MOISTURE DE		GIZZO	30111			

·	Pre Post Pre	0 Pilol La	03 @ 13 @ ak Checks Performed Le	10 5 egk Check @ 3	in Hg. In Hg. In. H2O?		Vol. Vol.	maine Flow metric Flow metric Flow	6,708 5,858	acim dscim scim	
	Post					TERMINATIO	N				
	Inilial Impi Final Impi	inger Content: Inger Content: Difference:	2890.6	ml ml		Silio	a Inilial WL ca Final WL Difference:	830.8 839.2 8.4	diawa Grewa		
	Tole	Dillerelice:	•		. !	Moislure, Bws:	0,059	S	upersaturatio	n Value, Bws:	0,085*
		Velocity	Orifico	 Actual		Stack		Temp	Pump	Collected	Point Vel
Port-	Clock	Hoad Ap	ΔH	Meter Vol.	SqrL	Tomp 'F	inlet *F	Outlet *F	Vacuum In. Hg	Vol.	fi/sec
Paint No.	Time	in. H20	In. H2O	<u>₩</u>	Δp		58	58	3.0	1.542	15.608
1-1	13:11:00	0.07	1.04	7.438	0.285	98	- 60	59	3.0	1,530	15,606
22	13:13:30	0:07	1.04	8.980	0.265	99		59	3.0	1,540	15.600
.3	18:16:00.	0.07	1.04	10,510	0.285	100	62 63	59	3.0	1.530	15,808
. 4	13:18:30	0.07	. 1.04	12.050	0.265	. <u>101</u>	64	59	3,0	1.540	15,606
5	13;21:00	0.07	1.04	13,580	0.265	101	-65	59	3,0	1.530	15.808
6	13:23:30	.0.07	1.04	15.120	0.265	101	66	59	3.0	1.540	15,606
7	13:28:00	0.07	1.04	16.650	0.265	102		- 59	3.0	1,640	16.683
8	13:28:30	80.0	1.19	18.190	0.283	103	67	60	3.0.	1.840	16,683
g. ,	13:31:00	0.08	1.19	19,830	0,283	103	68	60	3.0	1.760	17.695
10	13:33:30	0.09	1.34	21.470	0,300	103	69		3.0	1.720	17,695
11	13:36:00	90.0	1.34	23.230	0.300	103	89	60	3,0	1.781	17,695
12	13:38:30.	0.09	1,34	24.950	0.300	103	89	60	3,0	1.781	11,000
	13:41:00			26.731					70	1,429	14.448
2-1	13:47:00	80,0	0.08	28,731	0,245	98	65	60	3.0	1.420	14,448
2	13:49:30	0,08	0.08	28.160	0.245	97	66	80	-3.0	1,430	14.448
3	13:52:00	0.06	0.08	29.580	0,245	97	86	61	3.0		15.806
4	13:54:30	0,07	1.04	31.010	0.285	97	67	61	3.0	1.530	15,606
5	13:57:00	0.07	1.04	32.540	0.285	97	68	<u>B1</u>	3.0	1.530	
в	13:59:30	0,07	1.04	.34,070	0.265	97	68	61	3.0	1.530	15.608 15.608
7	14:02:00	0.07	1.04	35,600	0.265	88	.69	61	3.0	1.540	
8	14:04:30	0.07	1.04	37.140	0.265	.99	69	<u>81</u>	3.0	1.530	15,606
Ð	14:07:00	0.07	1.04	38,670	0,265	.99	70	61	3.0	1.540	15.608
10	14:09:30	0.07	1.04	40,21	0.265	100	70	81	3	1.530	15.608
11	14:12:00	0.07	1.04	41.74	0:285	101	70	82	3	1.540	15.606
12	14:14:30	0.07	1.04	43,28	0.265	101	70	62	3	1,657	15.606
	14:17:00			44,837					<u> </u>		
									<u> </u>		<u> </u>
									<u> </u>		<u> </u>
											<u> </u>
									<u> </u>		
											<u> </u>

Customer: Nacme Steel Processing, LLC Plant: Chicago Facility

Location: HCl Scrubber Exhaust Stack

Date:

12/21/06

Start Time:

15:01

End Time:

16:06

Lo	ocation:	HCI Scru	ibber Exn	aust Stack	•					_	
		RY GAS MET	ER CONDITIO	วทร				STACK (Pb):	CONDITIONS 29,40	in. Hg.	
		ΔН	1.11	Tn, H₂O		В		ilic Pressure:		In. H ₂ O	
	Meter Ten	nperature, Tm:		¶F {п. Н₂О				(aq) eruseen		in, Hg. abs.	
	Stock To	Sqrt ΔP: :ST , stuisteann		*F			Ca	rbon Dloxide:		% %	*
		r Volume, Vm:		ci				Oxygen: Nitrogen:		79 %	
		olume, Vmsld:	37.586	dsci			Gas W	eight dry, Md:		lb/lb mole	
		olume, Vwsid:		wscf %l				ight wat, Ma		lb/lb mole	
	isokir	elic Verience:	97,2 n Leak Checks			1	-7	Excess Alr.		%	
	Pre	O Smithe He	(13. @	10	In Hg.	1	Gas	Velocity, Vs.	18,013	føs adm	
	Post	ō	n3 @	5	in Hg.	1		umainc Flow: umainc Flow:		dscim	
		Pilot Le	ak Checks		11nm2	1		umetric Flow:		scini	
	Pre	уeв	Performed L	cak Chack @ 3					-		
	Post	yes		MOI	STURE DE	ERMINATIO	N	771: 7			
	Initial Imp	nger Content:	2891.8	ml ·			a Iniliai WL a Final WL	825.6 833, 6	grams grams		
	Finel Imp	inger Content:	2930.8	mi		Juic	Difference:	_	B		
		Dillerence:				Antairem 'Dure	0.058		unarsaturatio	n Value, Bws:	0.081*
	Tola	i Waler Gain:	47		ח	Adisture, Bws:		r Temp	Pump	Collected	Point
		Velocity	Orllice	Actual Melar Vol.	Sgrt.	Stack Temp	iniet	Outlet	Vacuum	Vol.	Vel
Port-	Clock	Head Ap	ΔH In. H2O	Meior voi.	oqr⊾ Δp	. A.	*F	•F.	In. Hg	ft ⁴	Maec
Point No.	Time	. In, H2O		45,563	0.285	98	61	81	3.0	1.557	15.565
1-1	15:01:00	0.07	1.05	47,120	0,265	96	62	61	3.0	1,550	15,585
2	15:03:30	0.07	1.05	48,870	0.265	96	64	61	3,0	1.550	15,565
3	15:08:00	0,07	1,05	50.220	D.265	97	.60.	61	3.0	1.540	15,565
.4	15:08:30	0.07	1.05	51,760	0.265	98	-68-	. 61	3.0	1.550	15.585
Б	15:11:00	0.07	1.05	53,310	0.265	98	67	61	3.0	1,580	15.585
6	15:13:30	0.07		54,870	0,265	. 98	60	81	3.0.	1.540	15.585
7	15:18:00	0.07	1.05 1.05	58:410	0.265	98	69.	61	3.0	1.560	15,585
0	15:18:30	0.07	. 1.2	57.970	0,283	99	89	61	3,0	1.850	18.639
9	16:21:00	0.08	1.2	59.620	0,283	99	69	61	3.0	1.650	18.639
10	15:23:30	0.08	1.2	81,270	0.283	99	69	81	3.0	1.670	18.839
11	15:26:00 15:28:30	0.08	1.2	62.940	0.283	99	70	62	3.0	1.684	16.639
12	15:28:30	0.00		64.604			•				
	15:31:00	80,0	1.2	84.604	0.283	95·	67	62	3.0	1.876	16.639
2-1	15:38:30	80.0	1.2	68.280	0.283	.95	68	62	3.0	1.640	18.639
2	15:41:00	0.08	1.2	67.920	0.283	97	68.	62	3.0	1,680	16.539
<u>3</u> 4	15:43:30	0.08	1.2	69.580	0,283	97	69	62	3.0	1,650	16.639
	15:46:00	0,07	1.05	71.230	0,285	98	70	62	3.0	1,550	15,565
<u>5</u>	15:48:30	0,07	1.05	72.780	0.285	98	70	62	3.0	1.550	15.585
6	15:51:00	0,07	1.05	74,330	0.285	98	70	62	3.0	1,550	15,565
<u>7</u>	15:53:30	0.07	1.05	75.880	0.285	89.	70	62	3.0	1.550	15.565
<u>8</u> 9	15:58:00	0,07	1.05	77.430	0,265	99	70	62	3.0	1.550	15.565
10	15:58:30	0.07	1.05	78.08	0.265	98	70	63	3.0	1,550	15.565
11	18:01:00	0.0B	1.2	80.53	0,289	gp	70	63	3.0	1.850	18,839
12	16:03:30	0.08	1.2	82.18	0,283	98	70	63	3.0	1.680	16.639
12	18:08:00	<u> </u>		83.86							
	10.00.00										
·····	-										
•	 										
									1	l	

Customer: Nacme Steel Processing, LLC

Plant: Chicago Facility

Location: HCl Scrubber Exhaust Stack

Date:

12/21/06

Start Time:

16:49

End Time:

17:55

		STACK CO	NDITIONS	
DRY GAS METER ΔΗ: Meter Temperalure, Tm: Sqrt ΔΡ:	1.20 In. H ₂ O 63.8 °F 0.283 In. H ₂ O	STACK CU Baromeinc Pressure (Pb): Stallo Pressure: Flue Pressure (Ps): Carbon Dloxide:	29,40 0,40	in, Hg. In, H ₂ O In, Hg. aba. %
Slack Temperature, Ts; Meter Volume, Vm: Meter Volume, Vmstd: Meter Volume, Vwstd; Isokinelic Verlance:	97.8 °F 39.558 cf 38,904 dscf 2.317 wscf 98.8 %l	Oxygen: Nitrogen: Ges Weight dry, Md: Ges Weight wel, Ms: \ Excess Air:	28.838 28.227	% % Ib/Ib mole Ib/Ib mole %
Sampio Train L Pre 0 Post 0,005 Pitot Leak Pre yes P	13 @ 10 to 119. 13 @ 5 In Hg. Checks Performed Leak Check @ 3 In. H2O7	Gas Velocky, Va: Volumetric Flow: Volumetric Flow: Volumetric Flow:	7,08B 8,212	íps acím dscím scím
Post yes	MOISTURE DE	ERMINATION	rome	

Silica Initial WL Silica Final WL Difference: 839.2 847.6 grams grams Initial Impinger Content: Final Impinger Content: Difference: ml M 2867:2 2908 8.4 40,8

			** *		٨.	loisture, Bws:	0.058	5	upersaturation	n Value, Bws:	0,081*
Port-	Clock	Velocity Head Δp	49.2 Orifice ΔH In. H2O	Actual Meter Vol. ft*	Sqrt.	Stack Temp *F	Moter Inlet °F	Temp Outlet *F	Pump Vacuum In. Hp	Collected Vol. ft*	Point Vel fl/sec
Point No.	Time	In, H2O		84.07	0.265	95	60	80	3.0	1.543	15.567
1-1	18:49:00	0,07	1.04	1	0,265	85	62	80	3.0	1.530	16.587
2	16:51:30	0.07	1.04	85.61	0.285	95	84	60	3.0	1.540	15,567
3	18:54:00	. 0.07	1.04	87.14.	0:265	. 98	85	BD	3.0	1.540	15.587
4	18:56:30	0.07	1.04	88,88	0,265	97	88	80	3.0	1.530	15.567
5	18:59:00.	0.07	1.04	90.22	0,285	98	58:	gó	3.0	1.540	15.587
6	17:01:30	0.07	1.04	91.75		95	67	80	3	1,530	15,587
7	17:04:00	0.07	1.04	93,29	0.265	89	67	60	.3	1.650	18.841
. 8	17:00:30:	80.0	1.19	94.82	0.283	99	87	60	3	1:640	16.641
9	17:09:00	0.08	1.19	98.47	0.283	ii	. 68	61	3	1.740	17.651
10	17:11:30	0,09	1.34	98.11	0.300	100	68	61	3	1,740	17.651
11	17:14:00	0,09	1.34	99.65	0.300	100	.68	61	3	1.760	17.851
12	17:18:30	0,09	1.34	101.59	0.300	100		<u> </u>			
	17:19:00		<u>. ` </u>	103.35	ļ			81	3	1,680	16,641
2-1	17:25:00	0.08	1.19	103.35	0,283	95	85	61	3	1.830	18,641
2	17:27:30	0.08	1.19	105.01	0:283	97	88	61	3	1.740	17.651
3	17:30:00	0.09	1.34	108,84	· 0.300	97	67		3	1.740	17.651
4	17:32:30	0.09	1.34.	108.38	0.300	98	68	81.	3	1.750	17.851
5	17:35:00	0.09	1.94	110.12	0.300	97	88	61	3	1.840	18.841
6	17:37:30	0.08	1.19	111,87	0.283	97	68	81		1.640	16.641
7	17:40:00	0.08	1.19	113.51	0.283	98	69	61	.3	1.840	18.841
8	17:42:30	0.08	1.19	115.15	0.283	98	-69	61	3		16.641
8	17:45:00	0.08	1.19	116.79	0.283	88	70	61	3	1.640	16.641
10`	17:47:30	0.08	1.19	118.43	0.283	99	70.	61	3	1.660	17.851
	17:50:00	0.09	1.34	120.09	0.300	99	70	61	3	1.730	17.651
11	17:52:30	0.08	1,34	121.82	0.300	88 .	70	62	3	1.805	17.001
12	17:55:00			123.625				<u> </u>			
	17:00:00							<u> </u>			
	 						<u></u>				
	+		 								
			 	1							
<u></u>			 	1							
						Larana					

Customer: Nacme Steel Processing, LLC Plant: Chicago Facility Location: HCI Scrubber Exhaust Stack

Number of Analytes:

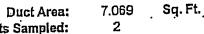
	Tylenday - Run 1	Run 2	Run 3	Run 4
Identify Analyte:	HCI			
Molecular Weight:	36.461	0.02	0.02	0.02
mg (net) collected:		0.02	0.02	0.02

Customer: Nacme Steel Processing, LLC

Plant: Chicago Facility

Test Location: HCI Scrubber Exhaust Stack

Test Engineer:	DT	
Temp ID:	CM13	
Meter ID:	CM13	
Pitot ID:	A8E0	
Pitot Tube Coefficient:	0.840	
Probe Length:	4.0	fl
Probe Liner Material:	Glass	
Nozzle Diameter:	0.374	in.
Meter Calibration Factor:	0.990	
Sample Plane:	Horizontal	
Port Length:	5.00	in.
Port Size (diameter):	4.00	in.
Port Type:	Flange	
Duct Shape:	Circular	
Diameter	3	ft



Number of Ports Sampled: 2
Number of Points per Port: 12
Minutes per Point: 2.5
otal Number of Traverse Points: 24

Test Length: 60 min.

Train Type: Anderson Box Source Condition: Maximum

of Runs 4



Procedures for Calibration

Nozzles

The nozzles are measured according to Method 5, Section 5.1.

Dry Gas Meters

The test meters are calibrated according to Method 5, Section 5.3 and "Procedures for Calibrating and Using Dry Gas Volume Meters as Calibration Standards" by P.R. Westlin and R.T. Shigehara, March 10, 1978.

Analytical Balance

The accuracy of the analytical balance is checked with Class S, Stainless Steel Type 303 weights manufactured by F. Hopken and Son, Jersey City, New Jersey.

Temperature Sensing Devices

The potentiometer and thermocouples are calibrated utilizing a NBS traceable millivolt source.

Pitot Tubes

The pitot tubes utilized during this test program are manufactured according to specifications described and illustrated in the Code of Federal Regulations, Title 40, Part 60, Appendix A, Methods 1 and 2. The pitot tubes comply with the alignment specifications in Method 2, Section 4; and the pitot tube assemblies are in compliance with specifications in the same section.

Avenge

RATION	
ETER BOX CALIBRATION	
AETER BY	
-2	

December 8, 2006 J. Robertson 29 65
Date: Calibrated By. Barometric Pressure :
CM13 9605804 1.0054
Dry Gas Meter No. Standard Moter No. Standard Meter (Yr)

	Y Chg (H@)	
	Time Sec.	
•	Time Min.	
•	Dry Gas Meter Avg. Temp. F	
•	Standard Meter Dry Gas Meter Dry Gas Meter Temp. F avg. Temp. F the tdi tdi tdo td	THE RESIDENCE AND ADDRESS OF THE PERSON NAMED IN
,	Dry Gas Meter Inlet Temp, F tdi	
	Standach Meles Temp. F tr	
	Dry Meter Gas Volume Vd	
	Orifice Standard Meter Dry Meter Setting in H20 Gas Volume Chg (H) Vr Vd	
	Orifice Setting in A20 Cbg (H)	
	Run Number	

·		L-	950.039	794.053	89	74	72		,			
म् व्यव			955.375	788,566	68.	75	72				-	
inital Pier		J 07 0	5.381	5.487	89	75	72	73	19	32	0.990	1.4/2
Dilletence			966,622	800.020	. 67	92	73					******
Final		.1	960.963	794.236	89	7.4	72					*/ */
		0.50	5,659	5.784	89	75	73	74	13	30.	0.989	1.383
Dilletence	1		971,911	805.432	89	78	73					
	•		966.848	800.241	. 68	75:	73.		-	- ;	7 980 0	1 577
		0,0	5.063	5.03	89	11	73	75	101	101	2002.0	
Unterence		2	977.315	810.933	68	92	74					
Final			972.226	805.728	89	77	73		1			1 647
Inital		0.90	5.089	5,205	68	78	74	761	6	141	0.55.0	
Dilletence	r		983.741	817.473	68	81	74					
Final			977.493	811,102	68	77	74			- 5	7000	1.606
10 miles	-4	1 20		126.9	. 68	61.	74	11.1	1	174		
Linerance Fr1			6	788.414	19:	81	72					
rain.			949.459	782,508	19	81	71			0	1 66 0	1.684
Difference	70	2.00			19	1 81		72 79		0		
									Avenge		0.990	1.594

STACK TEMPERATURE SENSOR CALIBRATION DATA FORM (FOR K-TYPE THERMOCOUPLES)

EPA Control Module Number:

CM13

Name: J. Robertson

Ambient Temperature:

67.6 °F

Date: December 8, 2006

Omega Engineering Calibrator Model No. CL23A Scrial #

T-249465

Date Of Calibration Verification:

September 22, 2006

Primary Standards Directly Traceable to National Institute of Standards and Technology (NIST)

Reference* Source Temperature, (°F)	Test Thermometer Temperature, (°F)	Temperature Difference, %
0	5	1.1
250	255	0.7
600	604	0.4
1200	1206	0.4

(Ref. Temp., °F + 460) - (Test Them. Temp., °F + 460) * 100 <= 1.5 %

Ref. Temp., °F + 460

Decen		
. Date:	Calibrated By:	Barometrio Pressure :
CMI3	9605804	1.0054
Dry Gas Meter No.	Standard Meler No.	Standard Meter (Yr)

			Chg (H@)
December 28, 2006 S. Dyra 29.41	•		>
Ö, , ,	į	III	S S
•	j	Ime	Min
i i	Dry Gas Meter	Avg. Temp. F	ធ
Date: Celibrated By: Barometric Pressure :	Dry Gas Meter	Injet Temp. F Outlet Temp. F Avg. Temp. F	opp
	Dry Gus Meter	Inlet Temp. F	ij
·	Sundard Meter Dry Gas Meter Dry Gas Meter	Temp. F	Ħ
CM13 9605804 1.0054		Gas Volume	PA
,	Standard Meter	Setting in H20 Gas Volume Gas Volume	Vr
Dry Gas Moler No. Sundard Meler No. Standard Meter (Yr)	Orifice	Setting in H20	Chg (H)
Dry G. Stands Stands			Run Number

Final		L	252.256	246.210	.89	74	72					
Trital		J	247.170	241.100	89	72	70	-	-	•	-	
Difference		0.20	5.086	5.110	.68	73	11	72	18	38	1.002	1.515
Pínal			257.854	251.825	68	77	73.					
Inital			252.559.	246.491	. 89	74	72	-		-		
Difference	-7	0.50	5.295	5.334	89	76	73	74	12	32	1.003	1.575
Final			618'897	257.339	. 89	79	74					
Inital	,		258,209	252.181	68	16	7.3	-		••	_	
Difference		0.70	5.110	5.158	. 68	78	74	76	10	23	1.003	1.621
Pinel			268.850	262.922	89	80	75				,	
[mith]			263,714	257.726	. 89	-11	74	-	-	_	-	
Difference	-4	0.90		5,196	89	. 79	75	171	ę.	3	1.002	1.564
Final			274,516	268.665	89	82	76	•				
4			269.475	263.555	89	<u>er</u>	75	-	-	***	-	,
Difference		1.20		5.110		81	76	78	7	48	1.002	1.604
Final			246.829	240.739	19	76	69					
Taita			241.638	235.573	67	74	69					
Difference	9	2.00	5.191	5.166	67	7.5	69	72	9	15	1,009	1.030

1.585

1.004

Average

STACK TEMPERATURE SENSOR CALIBRATION DATA FORM (FOR K-TYPE THERMOCOUPLES)

EPA Control Module Number:

CM13

Name: S. Dyra

Ambient Temperature:

66.3 °F

Date: December 28, 2006

Omega Engineering Calibrator Model No. CL23A Serial #

T-249465

Date Of Calibration Verification:

September 22, 2006

Primary Standards Directly Traceable to National Institute of Standards and Technology (NIST)

Reference ^e Source	Test Thermometer Temperature, (°F)	Temperature Difference, %
Temperature, (F)	4	. 0,9
. 0	254	0.6
250	603	. 0.3
600	1205	0.3
1200	1200	

(Ref. Temp., °F + 460) - (Test Therm. Temp., °F + 460) * 100 <= 1.5 %
Ref. Temp., °F + 460



Platt Environmental Services, Inc.

371 Balm Court Wood Dale, IL 60191 630-521-9400 630-521-9494 fax

Nozzle Calibration Sheet Set No. 2 Glass

Nominal Diameter	0.120	0,175	0.200	0.250	0.275	0.300	0.310	0.375	0.425	0.500	Other
Nozzle Diameter			0.198	T	1					0.500	
Nozzle Identification Number			,								

TYPE S PITOT TUBE INSPECTION DATA FORM

Pitot tube assembly level? Y yes no

Pitot tube openings damaged? _____yes (explain below) ___N_no

$$\alpha_1 = 3$$
 ° (<10°), $\alpha_2 = 0$

$$\alpha_1 = 3$$
 ° (<10°), $\alpha_2 = 0$ ° (<10°) $z = A \sin \gamma = 0.000$ (in.); (<0.125 in.)

$$\beta_1 = 1$$
 " (<5°), $\beta_2 = 1$

$$\beta_1 = 1$$
 $(<5^\circ)$, $\beta_2 = 1$ $(<5^\circ)$ $w = A \sin \theta = 0.019$ (in.); $(<0.03125$ in.)

$$\gamma = 0$$
°, $\theta = 1$ °, $A = 1.077$ (in.) $P_A = 0.54$ (in.), $P_B = 0.54$ (in.), $D_t =$ (in.)

$$P_A = 0.54$$
 (in.), $P_B = 0.54$ (in.), $D_t =$ (in.)

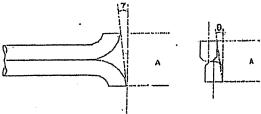
Comments:

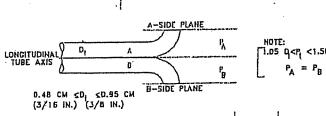
Calibration required? yes N no

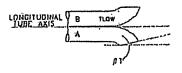
Pitot Tube No.: 38

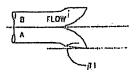
Date: 12/18/2006 Name:

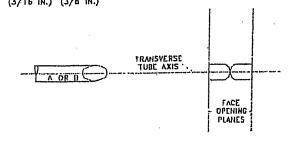
AAS

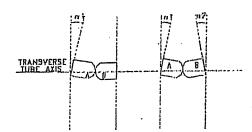


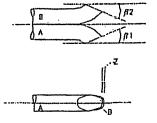














TYPE S PITOT TUBE INSPECTION DATA FORM

NOTE:

Pitot tube assembly level? Y yes ____no

Pitot tube openings damaged? _____yes (explain below) ____N no

$$\alpha_1 = 3^{\circ} (<10^{\circ}), \quad \alpha_2 = 0^{\circ} (<10^{\circ})$$

$$z = A \sin \gamma = \frac{0.000}{(in.)}; (< 0.125 in.)$$

$$\alpha_1 = 3^{\circ} (<10^{\circ}), \quad \alpha_2 = 0^{\circ} (<10^{\circ})$$
 $z = A \sin \gamma = 0.000 \text{ (in.)}; (<0.03125 \text{ in.)}$
 $\beta_1 = 1^{\circ} (<5^{\circ}), \quad \beta_2 = 1^{\circ} (<5^{\circ})$
 $w = A \sin \theta = 0.019 \text{ (in.)}; (<0.03125 \text{ in.})$

$$w = A \sin \theta = 0.019$$
 (in.); (<0.03125 in.)

$$\gamma = 0^{\circ}, \ \theta = 1^{\circ}, A = 1.077 \text{ (in.)}$$
 $P_A = 0.54 \text{ (in.)}, P_B = 0.54 \text{ (in.)}, D_t = (in.)$

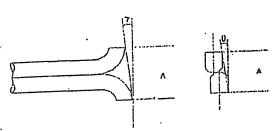
$$P_A = 0.54$$
 (in.), $P_B = 0.54$ (in.), $D_t =$ (in.)

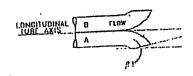
Comments:

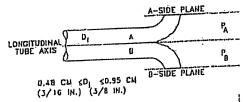
Calibration required? _____yes

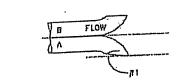
12/28/2006 Date: Pitot Tube No.: 38

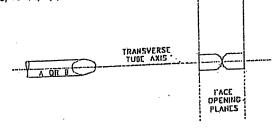
Name:

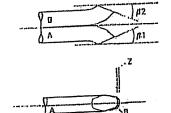


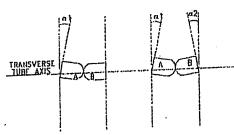






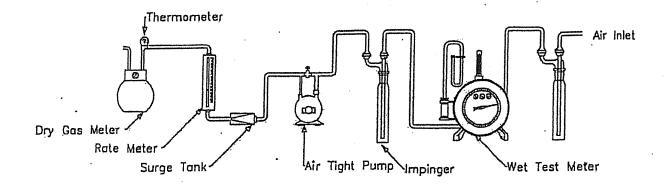








Dry Gas Meter Calibration Sample Train Diagram



Isokinetic Sampling Cover Sheet

Run Number: / Date: 12/21/9 ら Date: 12/21/9 ら Date: 12/21/9 ら Duct Shape: Circular Rectangular Length: 0r Port Type: ハルル	Neter ID: ころえん アレノのEペト Meter ID: こイリス Meter Y Value: 1990 Pitot ID: ころえん ラスト Pitot Coefficient: 18 字の Probe Length: ゲールのEペトの Nozzle Diameter: 1990 Fiter Number/Weight: 1990 Fiter Number/Weight: 1990 Fiter Number/Weight: 1990 Fiter Number/Weight: 1990 Fiter Number/Weight: 1990 Fiter Number/Weight: 1990 Fiter Notzle Leak Check: 1990 F	Ports Sampled: 2.5 Total Points: 2.7 Total Test Time: 60 Sample Plane(Horizontal or Vertical	Barometric Pressure: 27.7 Static Pressure: 0.4 Determined by: Method 3 ck Method 3 k Met
--	--	--	--

Comments:

Isokinetic Sampling Field Data Sheet

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 | 8 | | 47 | 25 | 47
 | 20% | 46 | 95 | 47
 | 27 | 47 | 47 | 86 | 200
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| Į. | 4 10 | 254 | 25.5 | 2.56 | 255
 | 255 | 257 | 256 | 255 | 255
 | 255 | | 255 | 256 | 254
 | 255 | 255 | 255 | 256
 | 256 | 255 | 256 | 256 | 255
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| | | 246 | 842 | 147 | 200
 | 245 | 2.56 | 249 | 250 | 249
 | 250 | 71 | 247 | 872 | 549
 | 152 | 250 | 152 | 248
 | 249 | 2.50 | 248 | 842 | 757
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Meter
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Vm) ft ² , | | 72.559 | 74.076 | 77.070 | 78,507
 | | 81.349 | 82,770 | 84,191 | 85.678
 | ~! | 820118 | | 70,586 | 82.013
 | 93,713 | 95,200 | 120.96 | 98.042
 | 99.46 | 100188 | 102,36 | 103.726 | 105,14
 | \$95'90/ | |
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,per | . 28 | 2877 | 1841 | 1,487 | 1.421
 | 1.421 | 1247 | 124.7 | 1.487 | 0/91/
 | 1,740 | | C8411 | 1,487 | 01.97
 | 1.487 | 1241 | 1.42) | 124:1
 | 1247 | 11.43 | 1.421 | 1.42/ | 1,42,1
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| | Ü | ,575 | 1275 | | 1 1
 | ,568 | 895 | 898 | .545 | . 656
 | 969; | | 1585 | 1585 | ,056
 | 395 | 1,562 | 1,568 | ,568
 | 8951 | ,568 | , 368 | 1,56 K | 395'
 | | |
| Square Root, | 72. | | | 26 | 124
 | 72. | . 24 | 1.24 | 720 | 87.
 | | | ,26 | 92' | 27.
 | ,26 | 1.27 | 777 | 771
 | 471 | 1,27 | 521 | 52 | 124
 | | |
| | 272 | 72,56 | 75.50 | 77.03 | 78.51
 | 79.93 | 55,18 | 82'28 | 84,20 | 89.58
 | 87,36 | 21.01.0 | 24,047 | 10,57 | 47.03
 | 95,12 | 45.21 | 16.00 | 18,02
 | 12.46 | 100.81 | 15.701 | | 0
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| es FD | | | | 66' |
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 | 15.17 | Į, | 64. | 77 | 1,11,
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 | 1,87 | 187 | 1,8,1 | 187 | 187
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 | 1/23 | 1125:30 | 1; | | 1135
 | 17.25.30 | 1120 | 11.77 | // Tb/X | 1
 | 1/2/1/26 | 11.27 | 0/ '000// | 19.11.94
 | 1501.30 | | | |
 | 177 | · |
| Port-
Point #. | | - - | 7. | -5 | 7
 | 7.1 | 2 | 7- | 01-1 |
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 | , | | 9 (| 10
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Isokinetic Sampling Cover Sheet

Date: 12/21/26 Client Name: 12/21/26 Client Name: 12/21/26 Client Name: 12/21/26 Client Name: 12/26/2 Length: or Diameter: 32// Test Method: 126.4 Flue Area: 7.06? Fort Length: 5''	Meter ID: ニュース Meter Y Value: ・・テラン Pitot Coefficient: ・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・	Points/Port: /2 Min./Point 2.5- Total Test Time: 6つ Sample Plane:任のizon国か Vertical
Run Number. 2. Test Location: <i>Hระเรเกษสะก ธมหางร7 ราชเปร</i> Duct Shape: <u>(Alfoua</u> Dor Rectangular Source Condition: Port Type:	Operator. DAN Toyock Pitot ID: 038A Probe Liner. 60455 Filter Number/Weight Pre-Test Nozzle Leak Check: 0,000 Pre-Test Pitot Leak Check: 0,000	Ports Sampled: 2 Total Points: 24

Stack Parameters

Static Pressure: /	Pinal Imp. Volume or Weight: Imp. Volume or Weight Gain: Silica We	
Barometric Pressure; 29.8	np. Volume or Weight #00 Ilica Weight: used for impingers and/or silica weight	

Comments:

Isokinetic Sampling Field Data Sheet

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Test Number:	75 micherator;	Page Number:
12/21/06	Helse Runger ExHOUSTS TO PERENTO	M26A
Date:	Test Location: A & C.	Test Method:
	MACME STEEL	CH1 C4 60, 1C
Project Number:	Client:	Plant:

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	(Vm/ It., Actual		8138	12.0	2.05	5	15,12	16.65	18117	19,83	21,47	23,23	24.95	26.731	26.731	28,16	29,58		32.54	34.07	35,60	37,14	38.67	40.21			144,837				
Orifice V		1,04	100 7	j -	Thoy !	1,0%	- 1	1,04	1117	1.19	1,34	거	1,34	·	1.89	187	,89	1,04	1.07	1.07	1.04	1.04	5011	1,04	1,04	1,04					·······
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to	Point #.	121	1 2-	-31	1/2-	-5/	7	-7			0/- 4	12-	31.7		1-2	2-	-3	h-	-5	9-	7-	2.8	5-	-10	7	7)-					

Isokinetic Sampling Cover Sheet

Project Number. Plant Name: CHICA GO. 14 Diameter: 367 Flue Area: 7.0 C? Porf Size:	1d Probe Data Meter Y Value:	Min./Point: 2.5 Sample Plane: Horizontal or Vertical		Determined by: Method 3 or Method 3A Imp. Volume or Weight Gain:
Plant Information Date: /2/21/0 & K Client Name: AACM & STEEC Length: Width: or Test Method: A 26A Port Length: S''	Meter ID: CM Pitot Coefficient S S S S S S S S S	Points/Port: /2 Total Test Time: 6 o	Stack Parameters	Static Pressure: 4/02%: 27.4/6 Final Imp. Volume or Weight: Final Silica Weight: 19/10/10/10/10/10/10/10/10/10/10/10/10/10/
Run Number: 3 Date: /2/21/0 G Test Location: 4ct 5cquage & Exhaust strict Client Name: 201/0 G Source Condition: Width: Width: 201/0 C Test Method: 200/0	Operator: DAN TURDER Pitot ID: 038 A Probe Liner. Filter Number/Weight Pre-Test Nozzle Leak Check: つ・ロッセ Pre-Test Pitot Leak Check: ごの S・S	Ports Sampled: 2 Total Points: 24		Barometric Pressure: 29.7 CO ₂ %: 02.8: Initial Imp. Volume or Weight: 400 Final Imp. Volume Initial Silica Weight: Hal Silica Weight: Model and S/N):

Isokinetic Sampling Field Data Sheet

m	DAN TUIDER	/ of /
Test Number:	Operator:	Page Number:
12/21/06	HEL SEKOBBER EXMAUSTSTACK	M26A
Dafe:	Test Location:	Test Method:
•	MACME STEEL	CHICAGO, 14
Project Number:	Client	Plant:

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Test Number: Operator: Page Number:	Meter Temp	19		200	9		Q		69	63	6.6	70		67	00	89		\square	20	_	70	70	70	70	20							
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12/21/06 106 5-K-09BB EXMAUST 5TACK M26A	Theoretical Meter Volume, (Vm) ft ³ , ft ³ , ft ³ , ft ³ , ft ³ ,		47,112	50 210	51,759	53,308	54.8.57	56, 406	57,955	52,611	61,267	62,923	64,579	٠	66,260	67.916	215.69	71.228	72,777	74,326	75.875	42h1/L	78.97	80,522	821178	83.834		•				
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Date: Test Location: Test Method:	Meter The Rate, Me Cubic Vo Feet (Vr. Min. Do	50		7	لما	1	1,620 1	620	662 /	799,	799,	, 599,		1,662	1 299.	.662	299	0291	7.65	0297	029.	4		70091	1,662					1		_
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576EL 14	Meter Volume (Vm) ft³,	63	47,12	50,22	51,76	53,31	54,87	56.41	57.97	57.62	61,27	62.94	64.604	V9 I	82199	67,92	69.58	71.23	N	74,33	00	77.43	28.98	80,53	85,18	83,800		·				
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Isokinetic Sampling Cover Sheet

Project Number: Plant Name: CHICAGOLIC Diameter: '36" Flue Area: 7. 667 Port Size: 4"	Meter Y Value: Probe Length: ザ/ Train Type: タルタミベジン Weight: *Leak Check: Coos (Coos)	Min./Point 2.5 Sample Plane: Horizontal or Vertical	Determined by: Method 3 or Method 3A Imp. Volume or Weight Gain: Silica Weight Gain:
Plant Information Date: $\frac{2/2!/O}{2!/O}$ 6 Length: Width: or Test Method: $\frac{7}{11}$ 26A Port Length: $\frac{5''}{11}$	Meter and Probe Data Meter ID: C/1 3 Pitot Coefficient: 8 4 0 Probe Length Nozzle Diameter: 374 Train Type: Thimble Number/Weight: Thimble Number/Weight: Thimble Number/Weight: Thimble Number/Weight: Trayerse Data	Points/Port: 12. Total Test Time: 60	Stack Parameters Static Pressure: 7 O2%: 20.4 Final Imp. Volume or Weight: Final Silica Weigh
Run Number: Hest Location: Hest Location: Hest Location: Hest Location: Hest Location: Hest Location: Length: Length: North: North: North: North: Length: Leng	Operator: DAV TOLORR Plot ID: a 3 8 A Probe Liner. 6 4 5 5 Filter Number/Weight: Pre-Test Nozzle Leak Check: 0 000 Pre-Test Plot Leak Check: 6000	Ports Sampled: 2. Total Points: 2.4	Barometric Pressure: 2%, 4 CO ₂ %. Initial Imp. Volume or Weight 400 Initial Silica Weight Balance used for impingers and/or silica

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Test Number. Operator. Page Number.	Meter T Temp C Inlet, 'F	09	67	3-6						89	ر ا ا			63	9	67	<i>∞</i> <i>∞</i>	80		, 63	+	\dashv		70	70	•				
t ACK	Stack Temp, °F		_	95	-	1		. 99	66	007	00/ 5	100	N		26.7		9 2 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	<u> </u>	,	2 98	7		66 X	99 21	56 2	45				
12/21/06 HGL SCRUGGER KXHAUST STACK M 26A	Theoretical Meter Volume, (Vm) ft³, total			87,137	90.211	747.1P	93,28	618,49	96,46	781103		161,587	103,332	•	286'H91	106.634	1081376	8/1/01/	981111	113,502	1,5,74	116,786	118,428	120,070	121 812	123,554				
* * '		1,536	,530	1536	536	1.536	1.536	2497	7.642	246	1,742	1.742		1.642	1,642	11742	1,742	2867	7,642	2697	1,642	1:097	1,642	2441	7,742					
Date: Test Localion: Test Method;	Meter Th Rate, Me Cubic Vo Feet (V,	\sqcup	1 1/5	2/2/	1/5/9	4/00	人の・	1657	1,657	1697	,647	1,697		1657	1657	1697	697	1697	,657	657	1657	1657	1657	1691	,657					
Date: Test Test	Square C Root, F	26.	, 26	921	76	Ü		X		-		7		`-	128	130	130	130	821	128	128	128	128	9 30	-	5				_
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Project Number: Client: Plant:	Тіпе	679)	1651:30	1054 2050 1050		1701; Ja	HOL	1206,34	1709		17/4	0E!91L1	17/9	1725	1127,30	1730	1722:30	1135	1737,30	1740	7	Ĭ	6 1747:30	1750	1 (752.30	1755				
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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
. v.) PCB No. 13 - 12 (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,)))
Respondent.)

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 13 MARCH 23, 2007 NACME'S CHANGE REQUEST FOR FESOP APPLICATION ("2007 FESOP APPLICATION") March 23, 2007

Mr. Valeriy Brodsky Division of Air Pollution Control Permit Section Illinois Environmental Protection Agency 1021 North Grand Avenue East Springfield, Illinois 62702

Re: Change Request for FESOP Application NACME Steel Processing, LLC I.D. No.: 031600FWL

Dear Mr. Brodsky:

Per our discussion, the purpose of this correspondence is to request a revision to the proposed raw material usage limitation for the Federally Enforceable State Operating Permit application (FESOP) for the NACME Steel Processing, LLC facility located at 429 West 127th Street in Chicago, Illinois (the facility).

Currently, the construction permit-revised, issued April 11, 2002, allows the facility a throughput process rate of 85.6 tons of steel per hour. The stack test conducted in 2002 was conducted at a throughput process rate of 33.3 tons of steel per hour. If nothing else was done at this point, the facility has been informed that the pending FESOP will be written for a throughput process rate of 33.3 tons of steel per hour based upon the 2002 stack testing program results.

Therefore, on December 21, 2006, another stack test, was performed at the facility for the purpose of demonstrating compliance with applicable emission at high process rates to obtain a proposed increase in the allowable steel process rate on the current FESOP from proposed 33.3 tons per hour to meet or exceed that of the Construction Permit—Revised, rate of 85.6 tons per hour.

United States Environmental Protection Agency test Method 26A was used to determine stack gas HCl concentrations on the ports after the stack scrubber. The results of this stack test were submitted to the Illinois Environmental Protection Agency (IEPA), Compliance and Enforcement Section in duplicate on January 25, 2007. This stack test was not done at the request of the IEPA for compliance issues.

The results of the December 2006 stack test demonstrated that the facility could process an average throughput rate of 119.9983 tons of steel per hour (see enclosed summary of NACME Stack Test Results) while maintaining compliance with the National Emission

Standards for Hazardous Air Pollutants (NESHAPS) for steel pickling operations outlined in 40 Code of Federal Regulations part 63, subpart CCC, § 63.1157 (40 CFR 63) and all other operating parameters including:

- Maximum HCl concentration in the pickling tanks of 16%
- Maximum pickling solution temperature of 190° F
- HCl makeup rate of no more than 236 gallons/hour

The gaseous emissions of the stack exhaust were measured to be below 0.01 parts per million by volume (ppmv) of HCl at the outlet of the stack scrubber; well below the permissible level of 18 ppmv, pursuant to 40 CFR 63.

Based on the December 2006 stack test results included in the submitted documents to the IEPA, the facility would like to request that the pending FESOP application be amended to allow the facility to process steel on the pickling line at a process throughput rate of 119 tons of steel per hour.

Enclosed please find the completed 197 CAAPP and 292 CAAPP forms and a check in the amount of \$2,000.00 made payable to the Illinois Environmental Protection Agency as part of the 197 CAAPP application fee determination.

If you have any questions, or need additional information, please contact our environmental consultant, Mr. David Osadjan at 630-993-2145.

Sincerely,

NACME STEEL PROCESSING, LLC

John DuBrock Director of Operations

Enclosures: 197 CAAPP 292 CAAPP . Fee Remittance for 197 CAAPP NACME Stack Test Results



ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

FOR AGENEY, USE IONLY

	ID NUMBER		
FEE DETERMINATION FOR	PERMIT #		
CONSTRUCTION PERMIT APPLICATION	COMPLETE	DATE COMPLETE:	
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	CODMATION THAT MUST	ACCOMPANY ALL	
THIS FORM IS TO BE USED BY ALL SOURCES TO SUPPLY FEE IN CONSTRUCTION PERMIT APPLICATIONS. THIS APPLICATION MUST COMPLETE. MAKE CHECK OR MONEY ORDER PAYABLE TO THE	LUNOIS ENVIRONMENT	AL PROTECTION AGENCY.	
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1) SOURCE NAME: NACME Steel Processing, LLC			
	3) SOURCE ID NO. (IF /	APPLICABLE) 031600FWL	
2) PROJECT NAME: Change request for construction permit- revised and FESOP based on stack test results.			

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4) FILL IN THE FOLLOWING THREE	BOXES AS D	ETERMINED IN SECTIONS 1 THR	OUGH 4 BEL	Ovr.	
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COLUD RESULT IN THE APPLICATION BEING DENIES AND ADDROVED BY THE FORMS MANAGEMENT CENTER.

COULD RESULT IN THE APPLICATION BEING DENIED AND FEMALTIES DIVIDED 415 ICCS ET SECTION IN THE PORMS MANAGEMENT CENTER.

APPLICATION PAGE ____

197-FEE

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EMISSION UNITS, ENTER \$500.	8) 0.00
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CITOLO III	
SECTION STORES	ATION
ADDUCATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEN	AND DELICE ECONED AFTER REASONABLE
NOTE: APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEN 28) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION INQUIRY, THE INFORMATION CONTAINED IN THIS FEE APPLICATION IN	S TRUE, ACCURATE AND COMPLETE.
(Moderney)	Director of Operations
BY: SIGNATURE	TITLE OF SIGNATORY
5,0,0,0	1
John DuBrock	DATE
TYPED OR PRINTED OF SIGNATORY	

APPLICATION	PAGE	2
	FEE.	



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION P.O. BOX 19506 SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE
Revision #:

FEE DETERMINATION F	∙OR
CAAPP PERMIT	

TOP	AGENGY USE ONLY
ID NUMBER:	
PERMIT #:	
i Li viii . a .	
DATE:	

THE DATA PROVIDED ON THIS FORM WILL BE USED TO DETERMINE THE PERMIT FEE. THE EMISSION LEVELS STATED ON THIS FORM CAN ONLY BE USED FOR THE PURPOSE OF PERMIT FEE DETERMINATION IF THE APPLICANT IS WILLING TO ACCEPT THESE LEVELS AS PERMIT SPECIAL CONDITIONS, EMISSIONS DATA PROVIDED ON THIS FORM MUST BE IDENTICAL TO DATA IN THE "PERMITTED EMISSION PRATE" COLUMNS PROVIDED ON THE DATA AND INFORMATION FORM FOR INDIVIDUAL EMISSION UNITS OR CONTROL EQUIPMENT. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS 292-1.

ADDITION & C. C.		
	CE INFORMATION	•
1) SOURCE NAME: NACME Steel Processing, L	.LC	•
2) DATE FORM PREPARED: March 16, 2007	3) SOURCE ID NO. (IF KNOWN): 031600FWL	S
FIGURES, INC.		

		FEE DATA	4		NZ
4) WILL THE SOURCE PAY	YE	s 🔀 NO			
IF YES, THE REMAINDER	R OF THIS FORM D	OOES NOT NEED TO	BE COMPLETED). 	
5) EMISSION UNIT*	NITROGEN OXIDES (NO _X) (TONS/YR)	PARTICULATE MATTER (PART) (TONS/YR)	SULFUR DIOXIDE (SO ₂) (TONSYR)	VOLATILE ORGANIC MATERIAL (VOM) (TONS/YR)	OTHER** SPECIFY HAP Hydrogen Chloride (TONS/YR)
01-Steel Pickling Line					1.8
Boiler 1	2.93	0.22	0.02	0.16	
Boiler 2	2.93	0.22	0.02	0.16	
					0.44
HCL ASTs					·
· · · · · · · · · · · · · · · · · · ·					
				CONTINUE AS IT APPEA	PS ON THE DATA AN

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1981, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039,5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE 1

Printed on Recycled Paper 292-CAAPP

Rev. 6/6/2003

^{*}EMISSION UNIT - PROVIDE THE NAME AND FLOW DIAGRAM DESIGNATION OF THE EMISSION UNIT AS IT APPEARS ON THE DATA AND

INFORMATION FORM.

***OTHER - ANY HAZARDOUS AIR POLLUTANT (HAP) NOT INCLUDED ELSEWHERE, E.G., CHLORINE, HCI, ETC.

5) (CONTINUED) NITROGEN PARTICULATE SULFUR VOLATILE OPERANGE OPERANGE.

5) (CONTINUED)	NITROGEN OXIDES (NO _X)	PARTICULATE MATTER (PART)	SULFUR DIOXIDE (SO ₂)	VOLATILE ORGANIC MATERIAL (VOM)	OTHER** SPECIFY
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^{*}EMISSION UNIT - PROVIDE THE NAME AND FLOW DIAGRAM DESIGNATION OF THE EMISSION UNIT AS IT APPEARS ON THE DATA AND INFORMATION FORM.

^{**}OTHER - ANY HAZARDOUS AIR POLLUTANT (HAP) NOT INCLUDED ELSEWHERE, E.G., CHLORINE, HCI, ETC.

6) SUBTOTAL	5.86	0.44	0.04	0.32	2.24
7) FUGITIVE	0	0	0	0	0
8) TOTAL	5.86	0.44	0.04	0.32	2.24
9) GRAND TOTAL - ADD I	BOXES A THROUGH I	E (TONS/YR):	***************************************		8.9
10) CALCULATED PERMI MULTIPLY GRAND TO					\$1,800
11) MINIMUM PERMIT FE YEAR. IF THE CALCU AMOUNTS THEN ENT WHICHEVER IS APPL	JLATED PERMIT FEE ER HERE, OTHERWI	IN ITEM 10 ABOVE SE ENTER THE MI	IS BETWEEN THE	SE TWO FEE	\$1,800

APPLICATION PAGE 2

Printed on Recycled Paper 292-CAAPP

NACME Steel Processing, LLC ID #: 031600FWL

Hydrogen Chloride Emissions Stack Test Results NPC - 1 Stack test 12/21/06

Start Time End Time Lbs of coils ran	1ST TEST 11:07 AM 12:10 AM Failed due to testing apparatus Glass probe broke	1:00 PM	4:15 PM 37840 37770 37930 37570	4:45 PM 5:50 PM Average 37710 37900 37750
Total Tons per hour		114.75	113.305	131.94 119.9983333

ATTACHMENT C

Brodsky, Valeriy

- 11 Q. Well -- yeah. Well, that's a fair
- 12 question. I guess I'd say within a year how many
- total facilities are you dealing with in terms of
- 14 writing a permit -- reviewing and writing a
- permit for in the year 2000?
- 16 A. Several dozens.
- 17 Q. Several dozen?
- 18 A. Yes.
- 19 Q. Do you have any help?
- 20 A. No.
- Q. So you can't delegate it to somebody
- 22 to say, "Here, take this and" --
- A. No. If it's assigned to me, it's my
- 24 responsibility to issue. We receive help for page 80
- 1 stack test analysis. We have special person
- 2 assigned for stack test reviews, basically, is
- 3 all. I do not receive any external help except
- 4 when I need to have stack test review done
- 5 professionally.
- 6 Q. All right. So I think we've seen --
- 7 well, a state operating permit was subsequently
- 8 issued after you did this review; right?

- 1 Q. (By Mr. Walsh) Let me show you
- 2 what's been marked Exhibit 25. Do you recognize
- 3 that?
- 4 A. Yes.
- 5 Q. I'm sorry. And what do recognize it
- 6 to be?
- 7 A. This is stack test review done by
- 8 specialist.
- 9 Q. Done by specialist. You testified
- 10 earlier that you sometimes -- or you don't
- 11 yourself review stack tests but you delegate
- 12 that ---
- 13 A. Yes.
- Q. -- to someone who is a specialist in
- that area; is that right?
- 16 A. Yes.
- 17 Q. And was the person that it was
- 18 delegated to Ken --
- 19 A. Erewele.
- Q. -- Erewele? That's his name?
- A. Uh-huh.
- Q. And did you, yourself, delegate it to
- 23 him?
- A. It's pretty much automatic procedure

- 1 because stack test report even doesn't go to
- 2 permit section. It goes to compliance unit which
- 3 perform these stack test reviews.
- 4 Q. All right. So is it your
- 5 recollection that you knew this was happening?
- 6 It didn't come to you, and then you delegated it
- 7 out, or that it -- how did it go? How did it
- 8 work procedurally?
- 9 A. Stack test report arrives to
- 10 compliance unit, and it's assigned on one of the
- 11 reviewer. He performs this review, and then we
- 12 receive copy of the result.
- 13 Q. You receive a copy --
- 14 A. Yes.
- Q. -- of the results. Okay.
- And you see the bottom paragraph
- 17 which reads, "The methodologies and general
- procedures described in the protocol comply with
- 19 the testing requirements"?
- A. Yeah.
- Q. What testing requirements is it
- 22 talking about there?
- A. Testing requirements. It's use of
- 24 correct test methods, timing, calibration of

- 1 equipment, a lot of technicalities which --
- Q. And the right data is included in the
- 3 report?
- 4 A. Yes.
- 5 Q. All right. And that's necessary for
- 6 the state to further process the state operating
- 7 permit that was pending at the time?
- 8 A. Yes.
- 9 Q. And it goes on to say, "The
- 10 compliance section recommends that the BOA accept
- 11 this test as valid." "BOA" is the bureau of air?
- 12 A. Exactly.
- 13 Q. Okay.

Brodsky, Valeriy

- 16 Q. (By Mr. Walsh) Let me show you
- 17 Exhibit 26, and just let me -- we may be able to
- 18 shortcut this. This is the emissions test that's
- 19 referred to in the exhibit that we just looked
- at, Exhibit 25. Is that your understanding?
- 21 A. Yes.
- Q. But if I understand your testimony,
- you probably wouldn't have looked at this in any
- 24 great detail because you send it to the -- Ken

- 1 Erewele ---
- 2 A. Yes.
- Q. -- for review?
- 4 A. I didn't send it. I said he
- 5 received. If I need additional information, I go
- 6 to compliance section and pick up this report to
- 7 look for some additional data.
- 8 Q. All right. So would this report not
- 9 even come to your permit file in the normal
- 10 course?
- 11 A. We have special file for the facility
- 12 which stores all tests.
- Q. Okay. So -- but would this, in the
- 14 normal course -- let me just ask you: Did this
- 15 test get sent to you? Do you remember?
- 16 A. No, I do not remember.
- 17 Q. And in the normal course, would it be
- 18 sent to you --
- 19 A. No.
- Q. -- unless you -- only if you asked
- 21 for it?
- 22 A. Yes.

ATTACHMENT D

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE PEOPLE OF ILLINOIS,)	
Complainant,)	
v.)	PCB No. 13 - 12 (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,)	(Emoreement 7 m)
•)	
Respondent.)	

NOTICE OF SERVICE

To: See Attached Service List.

PLEASE TAKE NOTICE that I have today served Respondent the <u>THE PEOPLE'S</u>

<u>IDENTIFICATION OF RULE 213(f)(1) LAY WITNESSES</u> pursuant to Illinois Pollution

Control Board's Order dated April 23, 2013.

Respectfully submitted,

Nancy J. Tikalsky

Assistant Attorney General

Office of the Illinois Attorney General

Environmental Bureau

69 West Washington Street, Suite 1800

Chicago, Illinois 60602

(312) 814-8567

Date: April 30, 2013

THIS FILING IS SUBMITTED ON RECYCLED PAPER

SERVICE LIST

Edward V. Walsh, III ReedSmith LLP 10 South Wacker Drive Chicago, Illinois 60606-7507

Maureen Wozniak Division of Legal Counsel Illinois Environmental Protection Agency 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276

Bradley P. Halloran, Hearing Officer (Notice and Certificate of Service only) Illinois Pollution Control Board 100 W. Randolph Street, Suite 11-500 Chicago, Illinois 60601

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE PEOPLE OF ILLINOIS,)	
Complainant,)	,
v.)	PCB No. 13 - 12 (Enforcement – Air)
NACME STEEL PROCESSING, LLC,)	(Binoreement 7 iii)
a Delaware limited liability corporation,		
)	
Respondent.)	

CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that on April 30, 2013, I served true and correct copies of Complainant's **THE PEOPLE'S IDENTIFICATION OF RULE 213(f)(1)**

LAY WITNESSES upon the persons and by the methods as follows:

[First Class U.S. Mail]

Edward V. Walsh, III ReedSmith LLP 10 South Wacker Drive Chicago, Illinois 60606-7507

[Email Attachment]

Maureen Wozniak
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

[Email Attachment(Notice and Certificate of Service only)-]

Bradley P. Halloran, Hearing Officer Illinois Pollution Control Board 100 W. Randolph Street, Suite 11-500 Chicago, Illinois 60601

Nancy J. Tikalsky

Assistant Attorney General Office of the Illinois Attorney General Environmental Bureau

69 West Washington Street, Suite 1800 Chicago, IL 60602

(312) 814-8567

Date: April 30, 2013

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 2013 - 12) (Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,)
Respondent.)

THE PEOPLE'S IDENTIFICATION OF RULE 213(f)(1) LAY WITNESSES

Plaintiff, PEOPLE OF THE STATE OF ILLINOIS ("People"), by its attorney, LISA MADIGAN, Attorney General of the State of Illinois, hereby furnishes, pursuant to Illinois Supreme Court Rule 213(f)(1), the identities and addresses of witnesses who will testify at hearing and identifies the subjects on which each witness will testify.

The People state that based on information in their possession at this time, they intend to call the following witnesses:

1. George Ordija, Illinois EPA – Environmental Protection Specialist, Bureau of Air, Division of Air Pollution Control. Mr. Ordija is expected to testify in support of the violations alleged in the People's Complaint, including his observations at and around Nacme facility located at 429 West 127th Street, Chicago, Cook County, Illinois ("Facility") during his inspections on September 28, 2010. Mr. Ordija is also expected to testify about his conversations with Nacme personnel. In addition, Mr. Ordija is expected to testify about documents and correspondence submitted by Nacme to the Illinois EPA. Mr. Ordija may be contacted through the People's counsel. The People's investigation in this matter is continuing, and the People reserve the right to further supplement and update the extent of Mr. Ordija's testimony.

- 2. Yasmine Keppner-Bauman, IEPA, Illinois EPA Environmental Protection

 Specialist, Bureau of Air, Division of Air Pollution Control. Ms. Keppner-Bauman is expected to testify about her knowledge and familiarity of violations against the Nacme Facility. Ms. Keppner-Bauman is also expected to testify about her conversations with Nacme personnel. In addition, Ms. Keppner-Bauman is expected to testify about documents and correspondence exchanged between Nacme and the Illinois EPA. Ms. Keppner-Bauman may be contacted through the People's counsel. The People's investigation in this matter is continuing, and the People reserve the right to further supplement and update the extent of Ms. Keppner-Bauman's testimony.
- Air, Division of Air Pollution Control. Mr. Brodsky is expected to testify in support of the violations alleged in the People's Complaint, including his familiar with permit applications and permit-related communications and documentation, including stack tests, associated with the Nacme Facility. Mr. Brodsky is also expected to testify about his conversations with Nacme personnel and Nacme's environmental consultants. In addition, Mr. Brodsky is expected to testify about documents and correspondence submitted by Nacme and its environmental consultants to the Illinois EPA. Mr. Brodsky may be contacted through the People's counsel. The People's investigation in this matter is continuing, and the People reserve the right to further supplement and update the extent of Mr. Brodsky's testimony.
- 4. Harish Narayen, Illinois EPA, Regional Manager, Bureau of Air, Division of Air Pollution Control, Des Plaines Field Operation Section. Mr. Narayen is expected to testify in support of the violations alleged in the People's Complaint, including his familiar with permit applications and permit-related communications and documentation, including stack tests,

associated with the Nacme Facility. In addition, Mr. Narayen is also expected to testify about his conversations with Nacme personnel and Nacme's environmental consultants; and about documents and correspondence submitted by Nacme and its environmental consultants to the Illinois EPA. Mr. Narayen may be contacted through the People's counsel. The People's investigation in this matter is continuing, and the People reserve the right to further supplement and update the extent of Mr. Narayen's testimony.

- 5. Bob Bernoteit, Illinois EPA, Manager, Bureau of Air, Division of Air Pollution
 Control, Federally Enforceable State Operating Permit Unit. Mr. Bernoteit is expected to testify
 in support of the violations alleged in the People's Complaint, including his familiarity with
 permit applications and permit-related communications and documentation, including stack tests,
 associated with the Nacme Facility. Mr. Bernoteit is also expected to testify about his
 conversations with Nacme personnel and Nacme's environmental consultants. In addition, Mr.
 Bernoteit is expected to testify about documents and correspondence submitted by Nacme and its
 environmental consultants to the Illinois EPA. Mr. Bernoteit may be contacted through the
 People's counsel. The People's investigation in this matter is continuing, and the People reserve
 the right to further supplement and update the extent of Mr. Bernoteit's testimony.
- 6. David Bloomberg, Illinois EPA, Manager, Bureau of Air, Division of Air

 Pollution Control, Air Quality Planning Section; formerly Manager, Air Compliance Section.

 Mr. Bloomberg is expected to testify in support of the violations alleged in the People's

 Complaint, including his knowledge regarding the sending of Violation Notice, the rejection of the Compliance Commitment Agreement ("CCA"), and Notice of Intent to Pursue Legal Action

 ("NITPLA") processes. Mr. Bloomberg may be contacted through the People's counsel. The

People's investigation in this matter is continuing, and the People reserve the right to further supplement and update the extent of Mr. Bloomberg's testimony.

- 7. <u>John DuBrock, Nacme, General Manager of the Facility</u>. Mr. DuBrock is expected to testify about Nacme's operations at its Facility and about the violations alleged in the People's Complaint.
- 8. <u>Bob Hendrickson, Nacme, Plant Manager of the Facility</u>. Mr. Hendrickson is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.
- 9. <u>Tom Beach, Nacme, Vice President and Plant Manager</u>. Mr. Beach is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.
- 10. <u>William Reichel, Nacme, Plant Manager of the Facility</u>. Mr. Reichel is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.
- 11. <u>Vytas Ambutas, Nacme</u>. Mr. Ambutas is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.
- 12. <u>Bob Wisdom, Nacme, Manager</u>. Mr. Wisdom is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.
- 13. <u>Britt Wenzel, Mostardi Platt Environmental Services, Inc., Manager,</u>
 Environmental Compliance Management/environmental consultant for Nacme for the Facility.

- Mr. Wenzel is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.
- 14. <u>Jamie C. Iatropulos, Mostardi Platt Environmental Services, Inc., Staff</u>

 <u>Consultant, Environmental Compliance Management/environmental consultant for Nacme for the Facility.</u> Mr. Iatropulos is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.
- 15. <u>Chris E. Jensen, Mostardi Platt Environmental Services, Inc., Program Manager, Environmental Compliance Management/environmental consultant for Nacme for the Facility.</u>

 Mr. Jensen is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.
- 16. <u>Timothy E. Russ, Mostardi Platt Environmental Services, Inc., Program Manager, Environmental Compliance Management/environmental consultant for Nacme for the Facility.</u>

 Mr. Russ is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.
- 17. James F. Robertson, Mostardi Platt Environmental Services, Inc., Project

 Manager, Environmental Compliance Management/environmental consultant for Nacme for the

 Facility. Mr. Robertson is expected to testify about Nacme's operations and air permits at its

 Facility and about the violations alleged in the People's Complaint.
- 18. <u>Jeffrey M. Crivlare, Mostardi Platt Environmental Services, Inc., Project</u>

 <u>Manager, Environmental Compliance Management/environmental consultant for Nacme for the Facility.</u> Mr. Crivlare is expected to testify about Nacme's operations and air permits at its

 Facility and about the violations alleged in the People's Complaint.

- 19. <u>Gayle E. O'Neill, Ph.D., TEI Analytical, Inc. for Mostardi Platt Environmental</u>

 <u>Services, Inc., Environmental Compliance Management/environmental consultant for Nacme for the Facility.</u> Dr. O'Neill is expected to testify about Laboratory Reports of stack test data.
- 20. <u>Rebuttal Witnesses</u>. The People intend to call rebuttal witnesses at trial as necessary. The People further state that their investigation continues and that they reserve the right to supplement their response to this Interrogatory and the disclosure of lay witnesses and the subjects on which each witness will testify as additional information becomes available (*e.g.* after the Board's decision on the People's Motion to Strike and Dismiss Respondent's Amended Affirmative Defenses, conducting depositions and/or Nacme's Supplementing its Discovery Responses).

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS, LISA MADIGAN, Attorney General of the State of Illinois

RV.

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Assistant Attorney General

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ATTACHMENT E

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APR 2 3 2013

ILLINOIS POLLUTION CONTROL BOARD April 23, 2013

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.)) PCB 13-12
NACME STEEL PROCESSING, LLC, a) (Enforcement – Air)
Delaware limited liability corporation,)
Respondent)

HEARING OFFICER ORDER

On April 18, 2013, the parties filed an agreed motion to revise the existing discovery schedule. The motion is accepted to the extent as follows.

The parties must disclose all lay witnesses who may testify on or before April 30, 2013. The parties must complete all lay witness depositions on or before May 31, 2013. The parties must disclose all expert witnesses who may testify on or before June 28, 2013. The parties must file rebuttal reports of expert witnesses on or before July 31, 2013. The parties must complete all depositions of expert witnesses on or before August 30, 2013. Discovery closes on August 30, 2013.

The parties or their legal representatives are directed to appear at a telephonic status conference with the hearing officer on May 16, 2013, at 9:30 a.m. The telephonic status conference must be initiated by the complainant, but each party is nonetheless responsible for its own appearance. At the conference, the parties must be prepared to discuss the status of the above-captioned matter and their readiness for hearing.

IT IS SO ORDERED.

Bradley P. Wellon

Bradly P. Hellon

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center, Suite 11-500
100 W. Randolph Street
Chicago, Illinois 60601
312.814.8917
Brad.Halloran@illinois.gov

CERTIFICATE OF SERVICE

It is hereby certified that true copies of the foregoing order were mailed, first class, on April 23, 2013, to each of the persons on the service list below.

It is hereby certified that a true copy of the foregoing order was hand delivered to the following on April 23, 2013:

John T. Therriault Illinois Pollution Control Board James R. Thompson Center 100 W. Randolph St., Ste. 11-500 Chicago, Illinois 60601

> Bradley P. Halloran Hearing Officer Illinois Pollution Control Board James R. Thompson Center 100 West Randolph Street, Suite 11-500 Chicago, Illinois

SERVICE LIST

PCB 2013-012 Edward V. Walsh III ReedSmith LLP 10 S. Wacker Drive Suite 4000 Chicago, IL 60606 PCB 2013-012 Nancy J. Tikalsky Office of the Attorney General 69 W. Washington Street Suite 1800 Chicago, IL 60602