

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

ALTER TRADING CORPORATION,	)	
	)	
Petitioner,	)	PCB No. _____
	)	(Air Construction Permit and Lifetime
v.	)	Operating Permit Denial - 90-Day
	)	Extension)
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

**NOTICE OF FILING**

To: Don Brown, Clerk of the Board	Robb Layman
Illinois Pollution Control Board	Illinois Environmental Protection Agency
James R. Thompson Center	1021 N. Grand Avenue
100 W. Randolph, Suite 11-500	Post Office Box 19276
Chicago, Illinois 60601	Springfield, Illinois 19276
<a href="mailto:Don.Brown@illinois.gov">Don.Brown@illinois.gov</a>	<a href="mailto:Robb.Layman@illinois.gov">Robb.Layman@illinois.gov</a>
(Via Electronic Mail)	(Via Electronic Mail)

**PLEASE TAKE NOTICE** that on April 9, 2020, **Alter Trading Corporation** electronically filed with the Office of the Clerk of the Illinois Pollution Control Board **JOINT REQUEST FOR NINETY DAY EXTENSION OF APPEAL PERIOD**, a copy of which is hereby served upon you.

**ALTER TRADING CORPORATION**

By: /s/ Eric E. Boyd  
One of Its Attorneys

Eric E. Boyd  
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Firm I.D. No. 48614

**CERTIFICATE OF E-MAIL SERVICE**

The undersigned attorney certifies that he served a copy of the foregoing NOTICE OF FILING and a copy of the JOINT REQUEST FOR NINETY DAY EXTENSION OF APPEAL PERIOD to the above-listed parties, by sending a copy to the email addresses designated above on or before 5:00 p.m. on April 9, 2020.

/s/ Eric E. Boyd  
One of the Attorneys for Alter Trading Corporation

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

ALTER TRADING CORPORATION,	)	
Petitioner,	)	
	)	
v.	)	PCB 20-
	)	(Air Construction Permit and
	)	Lifetime Operating Permit Denial -
	)	90-Day Extension )
ILLINOIS ENVIRONMENTAL PROTECTION	)	
AGENCY,	)	
Respondent.	)	

**JOINT REQUEST FOR NINETY DAY EXTENSION  
OF APPEAL PERIOD**

NOW COMES the Petitioner, Alter Trading Corporation, by its attorney, Eric E. Boyd, and Respondent, the Illinois Environmental Protection Agency (“Illinois EPA”), by one of its attorneys, Robb H. Layman, and, pursuant to Section 40(a)(1) of the Illinois Environmental Protection Act (415 ILCS 5/40(a)(1)) and 35 Ill. Adm. Code 105.208(a), hereby jointly requests that the Illinois Pollution Control Board (“Board”) grant an extension of the thirty-five (35) day period for petitioning for an appeal of a permit decision. In support thereof, the parties respectfully state as follows:

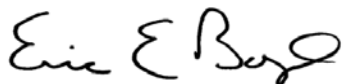
1. On or about March 16, 2020, the Illinois EPA issued a final permit decision to the Petitioner. *See*, Exhibit A.
2. Based on information and belief, Petitioner received the final permit decision on or about March 20, 2020.
3. On April 3, 2020, Petitioner made a verbal request to the Illinois EPA for an extension of time by which to file a petition for review with the Board, asking the Illinois EPA to

join in requesting that the Board extend the thirty-five (35) day period for filing a petition. By subsequent verbal agreement and in accordance with the Board's procedural requirements of 35 Ill. Adm. Code 105.208(a), the parties are seeking a full ninety (90) day extension of the appeal period to July 23, 2020, a date that will reflect a total of one hundred twenty-five (125) days from the date of receipt of the Illinois EPA's final permit decision.

4. The additional time requested by the parties may eliminate the need for a hearing in this matter or, in the alternative, allow the parties to identify issues and limit the scope of any hearing that may be necessary to resolve this matter.

WHEREFORE, for the reasons stated above, the parties request that the Board, in the interest of administrative and judicial economy, grant this request for an extension of the date for petitioning for an appeal of a permit decision.

Respectfully submitted,



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Dated: April 9, 2020

# EXHIBIT A



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/785-1705

CERTIFIED MAIL  
7012 0470 0001 3002 9697

CONSTRUCTION PERMIT GRANT and LIFETIME OPERATING PERMIT DENIAL

### PERMITTEE

Alter Trading Corp.  
Attn: Sarah Schlichthoiz  
700 Office Parkway  
St. Louis, Missouri 63141

Application No.: 20010008

I.D. No.: 201045AAJ

Applicant's Designation:

Date Received: January 21, 2020

Subject: Auto Shredder

Date Issued: March 16, 2020

Location: 201 South Wheeler Avenue, South Beloit, Winnebago County

This permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of the replacement of an existing Hammermill Auto Shredder equipped with a Z-Box separator system and water sprays, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit is issued based on the emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the Hammermill Auto Shredder with Z-Box being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from the above-listed equipment not triggering the requirements of Section 112(g) of the Clean Air Act.
- b. This permit is issued based on the construction of the Hammermill Auto Shredder with Z-Box not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 40 CFR 52.21 Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the emissions of Particulate Matter (PM), Particulate Matter less than 10 microns (PM<sub>10</sub>), and Volatile Organic Material (VOM) from the above-listed equipment below the levels that would trigger the applicability of these rules.
- c. The operation of the equipment listed above is allowed under this construction permit for a period of one year from the date of issuance noted above
- d. The operation of the emission units under this construction permit shall not begin until construction of the associated air pollution control equipment is complete and reasonable measures short of actual operation have been taken to verify proper operation.

- 2a. The Hammermill Auto Shredder with Z-Box is subject to 35 Ill. Adm. Code Part 212 Subpart B (Visible Emissions). Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. This source is subject to 35 Ill. Adm. Code Part 212 Subpart K (Fugitive Particulate Matter). Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- d. The Hammermill Auto Shredder with Z-Box is subject to 35 Ill. Adm. Code Part 212 Subpart L (Particulate Matter Emissions from Process Emission Units). Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- e. Pursuant to 35 Ill. Adm. Code 212.321(b), interpolated and extrapolated values of the data in 35 Ill. Adm. Code 212.321(c) shall be determined by using the equation:

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

where:

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

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

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

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

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

- f. Pursuant to 35 Ill. Adm. Code 212.321(c), Limits for Process Emission Units for Which Construction or Modification Commenced on or After April 14, 1972:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00
36.	8.2	40.00	18.20
41.	8.8	45.00	19.20
45.	9.3	50.00	20.50
90.	13.4	100.00	29.50
140.	17.0	150.00	37.00
180.	19.4	200.00	43.00
230.	22.	250.00	48.50
270.	24.	300.00	53.00
320.	26.	350.00	58.00
360.	28.	400.00	62.00
408.	30.1	450.00	66.00
454.	30.4	500.00	67.00

where:

P = Process weight rate in metric or T/hr, and  
 E = Allowable emission rate in kg/hr or lbs/hr.

3. The Hammermill Auto Shredder with Z-Box is subject to 35 Ill. Adm. Code Part 215 Subpart K (Use of Organic Material). Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302,

215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code Part 215 Subpart K shall apply only to photochemically reactive material.

4. This permit is issued based on the Hammermill Auto Shredder with Z-Box not being subject to the New Source Performance Standards (NSPS) for Metallic Mineral Processing Plants, 40 CFR 60 Subpart LL because the Metal Shredder System is not used to produce metallic mineral concentrates from ore.
5. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of 35 Ill. Adm. Code 212.314 shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to 35 Ill. Adm. Code 212.314 is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- 6a. All normal traffic pattern access areas and all normal traffic pattern roads and parking facilities which are located on the source's property shall be treated with water or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water or chemical dust suppressants shall have the treatment applied on a regular basis to minimize fugitive dust, in accordance with the operating program required by Condition 6(d).
- b. All unloading and transporting operations of materials collected by pollution control equipment shall be treated to minimize fugitive dust, in accordance with the operating program required by Condition 6(d)
- c. The Metal Shredder System, screening operations, conveyor transfer points, conveyors, storage bins and product truck and railcar loading operations shall be treated to minimize fugitive dust, in accordance with the operating program required by Condition 6(d).
- d. The emission units described in Conditions 6(a) through (c) shall be operated under the provisions of an operating program, consistent with the requirements set forth in Condition 6(e) and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- e. As a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;



- iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212.301, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- f. The Fugitive Particulate Operating Program, as initially submitted by the Permittee pursuant to Condition 6(d) dated September 9, 2019 (including any amendments submitted on later date) is incorporated herein by reference. The source shall be operated under and shall comply with the provisions of this Fugitive Particulate Operating Program and any amendments to the Fugitive Particulate Operating Program submitted pursuant to Condition 6(g).
- g. The Fugitive Particulate Operating Program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with Condition No. 6(e) and shall be submitted to the Illinois EPA within thirty (30) days of such amendment. Any future revision to the Fugitive Particulate Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the Illinois EPA. In the event that the Illinois EPA notifies the Permittee of a deficiency with any revision to the Fugitive Particulate Operating Program, the Permittee shall be required to revise and resubmit the Fugitive Particulate Operating Program within thirty (30) days of receipt of notification to address the deficiency.
- 7a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The water spray system and Z-Box separator shall be in operation at all times when the Hammermill Auto Shredder is in operation, except when processing clean metal, such as clip, baling, busheling, clean aluminum and skeletal plate that results in negligible PM emissions. The inlet of the Z-box separator shall be continuously maintained under negative air pressure, when it is operating.

- c. A flow totalization meter to determine water usage shall be installed, operated and maintained on the water supply to the water spray equipment.
  - d. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the water spray system and Z-box separator associated with the Hammermill Auto Shredder such that the water spray system and Z-box separator are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
  - e. The Permittee shall not shred scrap vehicles from which fuel and batteries have not been removed nor vehicles or appliances that have not had refrigerant properly removed and recovered.
- 8a. Emissions from and operation of the Hammermill Auto Shredder with Z-Box shall not exceed the following limits:

Emission Unit	Process Rate		Emission Factor (lb/Ton)		Emissions			
	(Tons/Mo)	(Tons/Yr)	PM*	VOM**	PM		VOM	
			Tons/Mo	Tons/Yr	Tons/Mo	Tons/Yr	Tons/Mo	Tons/Yr
Hammermill Auto Shredder with Z-Box	66,576	665,760	0.079	0.017	2.63	26.29	0.57	5.66

These limits are based on maximum material processed calculated from the average throughput rate of 76 tons/hr and maximum throughput rate of 100 tons/hr for the shredder, \*PM emission factors from the stack testing at other similar shredder sources, \*\*VOM emission factors from the stack test data from Miller Compressing Company, Milwaukee WI, August 8, 2004 shredder testing, and year round operation of 8,760 hours/year.

- b. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
9. This permit is issued based on the Potential to Emit (PTE) for Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a CAAPP Permit from the Illinois EPA.
- 10a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
  - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 11 and 12 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 11a. Pursuant to 35 Ill. Adm. Code 212.107, for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR Part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. 35 Ill. Adm. Code 212 Subpart A shall not apply to 35 Ill. Adm. Code 212.301.
  - b. Pursuant to 35 Ill. Adm. Code 212.109, except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.
  - c. Pursuant to 35 Ill. Adm. Code 212.110(a), measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR Part 60,

Appendix A, Methods 5, 5A, 5D, or 5E.

- d. Pursuant to 35 Ill. Adm. Code 212.110(b), the volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4.
  - e. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for opacity or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 12a. Within sixty (60) days after initial startup of the scrap metal recycling plant, the emissions from the Hammermill Shredder System, Ferrous Material Separation System, and Non-Ferrous Material Separation System shall be measured and the efficiencies of Cyclones, Regenerative Thermal Oxidizer (RTO), Quench/Packed Tower Scrubber, and Dust Collectors (DC-01 through DC-04) shall be determined during conditions which are representative of maximum emissions in order to demonstrate compliance with 35 Ill. Adm. Code 212.122 and 212.321, 35 Ill. Adm. Code 215.301, and Condition 7 of this permit.
- 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 51, Appendix M and 40 CFR 60, Appendix A for USEPA test methods.

Sample and Velocity Traverses for Stationary Sources	USEPA Method 1
Sample and Velocity Traverses for Stationary Sources With Small Stacks or Ducts	USEPA Method 1A
Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot Tube)	USEPA Method 2
Direct Measurement of Gas Volume Through Pipes and Small Ducts	USEPA Method 2A
Determination of Gas Velocity and Volumetric Flow Rate in Small Stacks or Ducts (Standard Pitot Tube)	USEPA Method 2C
Measurement of Gas Volume Flow Rates in Small Pipes and Ducts	USEPA Method 2D
Gas Analysis for the Determination of Dry Molecular Weight	USEPA Method 3
Determination of Moisture Content in Stack Gases	USEPA Method 4
Determination of Particulate Matter from Stationary Sources	USEPA Method 5
Visual Determination of the Opacity of Emissions from Stationary Sources	USEPA Method 9
Determination of Carbon Monoxide from Stationary Sources	USEPA Method 10
Visual Determination of Fugitive Emissions From Material Sources	USEPA Method 22
Determination of Total Gaseous Nonmethane Organic Emissions as Carbon	USEPA Method 25

Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer	USEPA Method 25A*
Determination of Hydrogen Chloride Emissions From Stationary Sources	USEPA Method 26
Determination of Metals Emissions from Stationary Sources	USEPA Method 29
Determination of PM <sub>10</sub> and PM <sub>2.5</sub> Emissions from Stationary Sources (Constant Sampling Rate Procedure)	USEPA Method 201A
Dry Impinger Method for Determining Condensable Particulate Emissions from Stationary Sources	USEPA Method 202

\*USEPA Method 25A may only be used if outlet VOM concentration is less than 50 ppm as carbon (non-methane).

- c. At least thirty (30) days prior to the actual date of testing, the Permittee shall submit a written test plan to the Illinois EPA, Bureau of Air, Compliance Section Section Manager. This plan shall include at a minimum:
- i. The name (or other identification) of the emission unit(s) to be tested and the name and address of the facility at which they are located;
  - ii. The name and address of the independent testing service(s) performing the tests, with the names of the individuals who may be performing sampling and analysis and their experience with similar tests;
  - iii. The specific determinations of emissions and/or performance which are intended to be made, including the site(s) in the ductwork or stack at which sampling will occur;
  - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum emissions, maximum operating rate, minimum control performance, the levels of operating parameters for the emission unit, including associated control equipment, at or within which compliance is intended to be shown, and the means by which the operating parameters will be determined;
  - v. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods. The specific sampling, analytical and quality control procedures which will be used, with an identification of the standard methods upon which they are based;
  - vi. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification;
  - vii. Any proposed use of an alternative test method, with detailed justification; and
  - viii. The format and content of the Source Test Report.

- d. The Permittee shall provide the Illinois EPA with written notification of testing at least thirty (30) days prior to testing and again five (5) days prior to the testing to enable the Illinois EPA to have an observer present. This notification shall include the name of emission unit(s) to be tested, scheduled date and time, and contact person with telephone number.
- e. If testing is delayed, the Permittee shall promptly notify the Illinois EPA by e-mail or facsimile, at least five (5) days prior to the scheduled date of testing or immediately, if the delay occurs in the five (5) days prior to the scheduled date. This notification shall also include the new date and time for testing, if set, or a separate notification shall be sent with this information when it is set.
- f. The Permittee shall submit the Final Source Test Report(s) for these tests accompanied by a cover letter stating whether or not compliance was shown, to the Illinois EPA, Bureau of Air, Compliance Section Manager without delay, within thirty (30) days after the test results are compiled, but no later than sixty (60) days after the date of testing or sampling. The Final Source Test Report shall include as a minimum:
  - i. General information describing the test, including the name and identification of the emission source which was tested, date of testing, names of personnel performing the tests, and Illinois EPA observers, if any;
  - ii. A summary of results;
  - iii. Description of test procedures and method(s), including description and map of emission units and sampling points, sampling train, testing and analysis equipment, and test schedule;
  - iv. Detailed description of test conditions, including:
    - A. List and description of the equipment (including serial numbers or other equipment specific identifiers) tested and process information (i.e., mode(s) of operation, process rate or throughput, fuel or raw material consumption rate, and heat content of the fuels);
    - B. Control equipment information (i.e., equipment condition and operating parameters) during testing; and
    - C. A discussion of any preparatory actions taken (i.e., inspections, maintenance and repair).
  - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration. Identification of the applicable regulatory standards and permit conditions that the testing was

performed to demonstrate compliance with, a comparison of the test results to the applicable regulatory standards and permit conditions, and a statement whether the test(s) demonstrated compliance with the applicable standards and permit conditions;

- vi. An explanation of any discrepancies among individual tests, failed tests or anomalous data;
  - vii. The results and discussion of all quality control evaluation data, including a copy of all quality control data; and
  - viii. The applicable operating parameters of the pollution control device(s) during testing (temperature, pressure drop, scrubbant flow rate, etc.), if any.
- g. Satisfactory completion of this test so as to demonstrate compliance with applicable emission standards and permit conditions is a prerequisite to issuance of an operating permit, pursuant to 35 Ill. Adm. Code 201.160(b).
13. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
14. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be

retained for at least three (3) years after the date a test is performed.

- 15a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records addressing use of good operating practices for the water spray system and Z-box separator associated with the Hammermill Auto Shredder:
    - A. Records for periodic inspection of the water spray system and Z-box separator with date, individual performing the inspection, and nature of inspection;
    - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair; and
    - C. Records for Hammermill Auto Shredder water spray usage (gallons/month and gallons/year), and records for Z-Box inlet differential air pressure (inches of water column).
  - ii. The Permittee shall keep a copy of the Fugitive Particulate Operating Program, any amendments or revisions to the Fugitive Particulate Operating Program, and the Permittee shall also keep a record of activities completed according to the Fugitive Particulate Operating Program.
  - iii. Material throughput (tons/month and tons/year) in the hammermill auto shredder; and
  - iv. Monthly and annual emissions of PM and VOM from the Hammermill Auto Shredder with Z-Box, with supporting documentation and calculations (tons/month and tons/year).
- b. All records and logs required by Condition 15(a) of this permit shall be retained at a readily accessible location at the source for at least three (3) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
16. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.



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17a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit or otherwise, the Permittee shall submit a report to the Illinois EPA's Bureau of Air Compliance Section in Springfield, Illinois within thirty (30) days after the exceedance or deviation. The report shall identify the duration and the emissions impact of the exceedance or deviation, a copy of the relevant records and information to resolve the exceedance or deviation, and a description of the efforts to reduce emissions from, and the duration of exceedance or deviation, and to prevent future occurrences of any such exceedance or deviation.

b. One (1) copy of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency  
Bureau of Air  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Please note that the application for a REVISED LIFETIME OPERATING permit is DENIED because the Illinois Environmental Protection Act, Section 9, and 35 Ill. Adm. Code 201.160(b) might be violated.

Pursuant to 35 Ill. Adm. Code 201.160(b), an operating permit may not be issued until the equipment has been constructed or modified in accordance with applicable conditions in this construction permit. The Illinois EPA suggests that you reapply for the operating permit after the construction and testing are successfully completed in accordance with the construction permit. This information must be submitted in duplicate and should reference the application and I.D. numbers assigned above.

If you have any questions on this permit, please call Jason Selling at 217/785-1705.

Raymond E. Pilapil  
Manager, Permit Section  
Bureau of Air

REP:JAS:tan



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

**STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS  
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

July 1, 1985

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

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

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act, and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The Permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:
  - a. 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 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.
5. The issuance of this permit:
  - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
  - b. 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 proposed facilities,
  - c. does not release the Permittee from compliance with the other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,
  - d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

- e. 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.
- 6.
- a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.
  - b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
- a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or
  - b. upon finding that any standard or special conditions have been violated, or
  - c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.