

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

**NACME STEEL PROCESSING, L.L.C.’s FIRST REQUESTS TO ADMIT
GENUINENESS OF DOCUMENTS TO RESPONDENT**

Petitioner NACME Steel Processing, L.L.C. (“NACME”), by its attorneys, Reed Smith, LLP., requests admission of the genuineness of the attached documents pursuant to 35 IAC 101.618(e):

1. Admit that the document attached as Exhibit A is a genuine, true and correct copy of a document from IEPA’s files.
2. Admit that the document attached as Exhibit B is a genuine, true and correct copy of a document from IEPA’s files.
3. Admit that the document attached as Exhibit C is a genuine, true and correct copy of a document from IEPA’s files.
4. Admit that the documents attached as Exhibit D are genuine, true and correct copies of documents from IEPA’s files.
5. Admit that the document attached as Exhibit E is a genuine, true and correct copy of a document from IEPA’s files.
6. Admit that the document attached as Exhibit F is a genuine, true and correct copy of a document from IEPA’s files.
7. Admit that the document attached as Exhibit G is a genuine, true and correct copy of a document from IEPA’s files.
8. Admit that the document attached as Exhibit H is a genuine, true and correct copy of a document from IEPA’s files.
9. Admit that the documents attached as Exhibit I are genuine, true and correct copies of documents from IEPA’s files.

10. Admit that the document attached as Exhibit J is a genuine, true and correct copy of a document from IEPA's files.

Respectfully submitted,

NACME STEEL PROCESSING, L.L.C.,
Petitioner

By: _____



One of Its Attorneys

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

Dated: November 1, 2012

CERTIFICATE OF SERVICE


I, the undersigned, certify that I have served the attached **NACME STEEL PROCESSING, LLC'S RESPONSE TO IEPA'S MOTION TO FILE REPLY**, 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

Dated: November 1, 2012

Exhibit A

CALCULATION SHEET

Facility NACME Steel Processing, LLC	I.D. 031600FWL
Anal. Eng. VJB	Date 04-12-2005
Rev. Eng.	Date Rec. 04-04-2005

1. The application for an operating permit renewal.

2. The traveler sheet has no marks.

3. The company performs steel pickling operations. The company made some changes to the control capture system and was required to perform a stack test on the scrubber after the change in Construction Permit 01040081. The stack test was performed in April 2002 but the company never requested implementation of the results in the operating permit. The most recent operating permit used emission factor 4.8 lb of HCl/10³ tons of metal processed based on the previous stack test data (June 21, 2000). The stack test from 4/02 indicates HCl emission rate 0.217 lb/hr and steel process rate 200 tons per 5 hours or 40 ton/hr. Emission factor $0.217/40 \times 1, = 5.4$ lb/10³ tons of steel – higher than currently permitted 4.8 lb/10³ tons.

HCl emission rate was measured in the scrubber exhaust. Reported scrubber efficiency is higher than 99% what may be translated in more than 20 lb/hr of uncontrolled emission. This number is consistent with actual measured uncontrolled emission in the previous stack test performed on 5/7/97 and submitted with 2/00 application. It results in HCl PTE exceeding 10 ton/yr – major source, subject to CAAPP/FESOP.

4. It is recommended to issue a NOI with request:

- 1) to update process and emission data based on the most recent stack test;
- 2) to perform PTE and actual emission calculations for HCl, and, based on the PTE calculations, to apply for a CAAPP/FESOP.

Exhibit B

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

Tier I Inspection Memorandum

Date: January 10, 2007 *11/1/07* **Inspection Date:** 12/21/06
To: Ed Bakowski *2/22* **Last Inspection:** 08/16/06
From: *1/25* Marcus Hatch *MA* **Region/District:** 1/16
Source: Nacme Steel **Identification No.:** 031600FWL
Address: 429 W 127th Street **Sic No.:** 3316
City/State: Chicago IL 60628
Contact/Title: Bob Wisdom, Manager **Telephone No.:** 773.291.1303
Purpose: FY2007 WP – Stack Test

Permit:

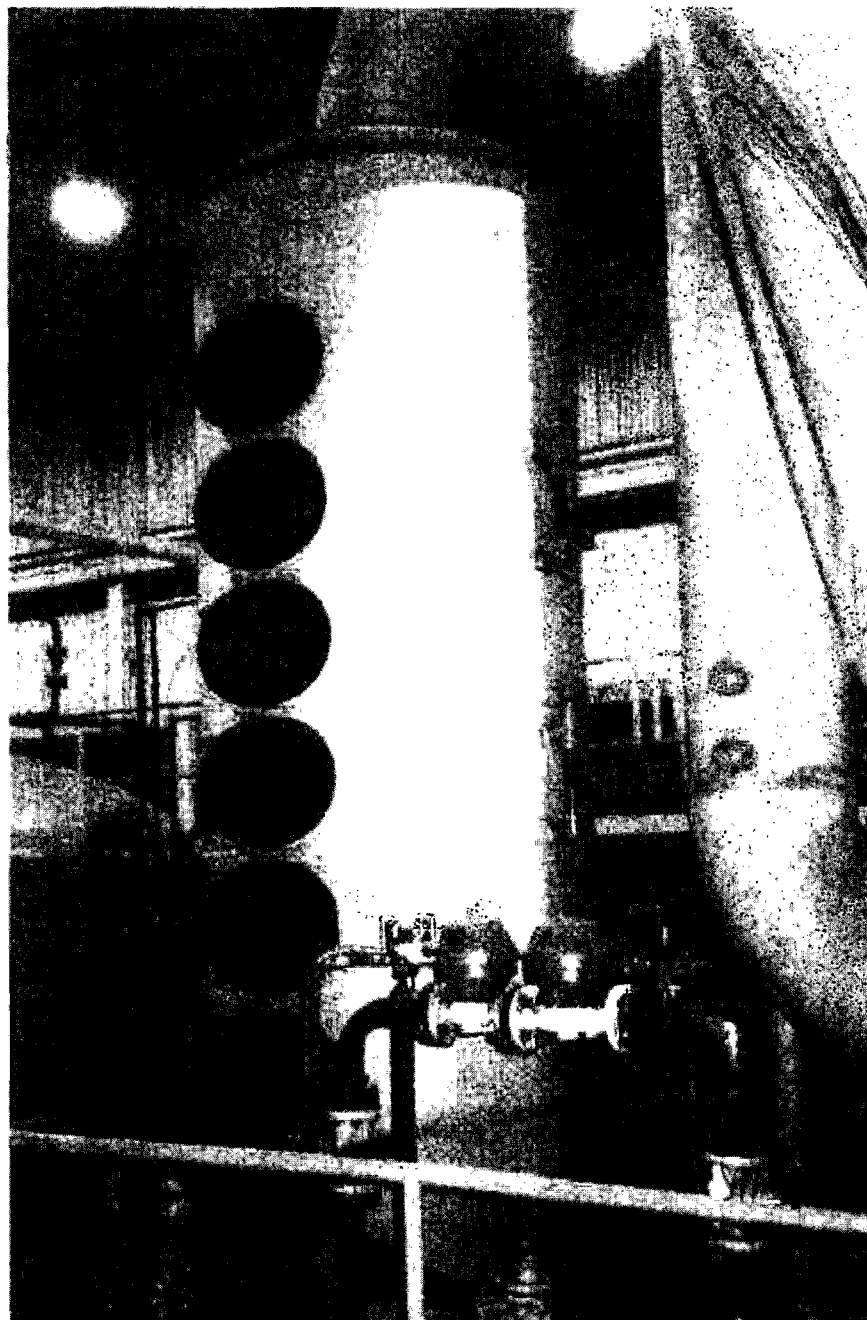
Application No	Issued	Expires	Designation
96020074	02/55/01	10/25/05	Steel Pickling

Source/Process Description

National Pickling (Nacme Steel) owns and operates a 90 ton per hour continuous coil pickling line at this location.

Four pickling tanks and a rinse tank utilize hydrochloric acid at various concentrations to remove "mill scale" or rust and impurities from hot rolled steel coil. During the hot rolling of steel in air, an oxide scale forms that must be removed before the steel can be used. Scale can be removed from the steel by passing it through acid solutions. Emissions of hydrochloric acid mist, (considered to be a particulate under PM 2.5), are ducted to a Pro-Eco 12,000 cfm four tray scrubber. Nacme also operates a coil slitting line and a low vapor pressure oil-type coil coating operation.

Nacme Steel
C31800FWL
Page 3



Photograph 1: 4 Tray Scrubber - HCl control

Nacme Steel
.031600FWL
Page 2

Findings:

12/21/06 – M. Hatch

The inspection was to observe a stack test. Nacme Steel is conducting the test as part of a permit renewal process. The current operating permit (#96020074) expired on October 25, 2005. A notice of Incompleteness dated September 20, 2005 was sent requiring the source to test the higher process weight rate requested in the renewal. In the prior stack test, conducted on 04/16/02, steel throughput averaged 33.3 tons per hour with an HCl emission rate of 0.217 pounds per hour. Nacme Steel is requesting an increase to 90 tons of steel an hour. The operating permit limited acid concentrations in the pickling bath 12% or less HCl and a temperature of 195 °F, the operating conditions during the last performance test.

Mostardi Platt had begun run 1 shortly before the author arrived. The run was scrapped because the glass liner in the probe broke and the final leak check on Run 1 could no be done. The pump came to a dead stop when the probe was blocked. Process data (process weight rate) was collected included in the attachments. Line conditions are noted here. The source was pickling at a rate of 90 tons per hour during the two runs observed. The strongest acid concentration run during test was under 12% HCl. The scrubbant flow rate was 2.5 gpm, pH was 8, pressure drop was 8 inches of water column. The CEM read a consistently low in the 0-2 ppm range.

A CEM is used to monitor HCl levels from the scrubber. The CEM is equipped with alarms that sound when levels reach 5 ppm at operator station, 15 ppm at the scrubber outlet, and shut the line off at 17 ppm. The source is conducting daily visual checks and quarterly calibration of the MSA analyzer. Calibrations are done with zero and 40 ppm HCl calibration gas. Maintenance and calibration records are maintained on the CEM.

The primary control is a turbo tunnel system with a tray scrubber system using a caustic scrubbant (pH 8). Physical inspection of the scrubber showed good flow through the trays, no deflection or bypassing of the trays. cid concentration, temperature and process weight rate limits and production data were reviewed. No deviations noted.

The source was the subject of a citizen complaint (#060816-01) and inspected on 08/16/06 with Paul Maly. Inspection of the source showed acid concentrations and temperature within permit limits and a 2 ppm HCl emission rate. See inspection report dated 08/30/06.

Nacme Steel
031800FWL
Page 4

CONFIDENTIAL

FOR AGENCY USE ONLY

CONCLUSIONS/RECOMMENDATIONS

12/21/06 – M. Hatch

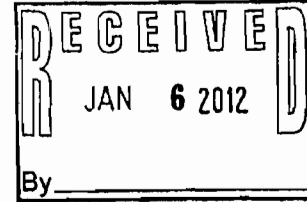
The inspection was to observe a stack test. In their permit renewal, Nacme Steel is requesting an increase in steel throughput, and a performance test was required. The source was operating at rates of 90 tons per hour during the two runs witnessed. The production data was sampled and is included as an attachment. The CEM was reading 0-2 ppm HCl.

The permit renewal was denied and the source was required to test at the higher process weight rate requested in their renewal. The previous limits in the permit were imposed on the source as the result of process conditions observed by me during the last stack test.

The source is in compliance with their permit special conditions. Acid concentration, temperature and process weight rate limits and production data were reviewed. No deviations noted. Workplan and stack test were combined into single inspection for better use of time.

cc: E. Bakowski/Central File
File

Exhibit C



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

Lisa Madigan
ATTORNEY GENERAL

January 5, 2012

David Susler
Associate General Counsel
Nacme Steel Processing
1965 Pratt Boulevard
Elk Grove Village, IL 60007

Sent via US mail certified, return receipt

Re: Nacme Steel Processing -Enforcement Action for Alleged Violations of the Illinois Environmental Protection Act and Illinois Pollution Control Board Regulations

Dear Mr. Susler:

The Illinois Environmental Protection Agency ("Illinois EPA") referred the above-referenced matter to the Office of Attorney General for the initiation of an enforcement action. Specifically, the Illinois EPA alleges the violations listed in the enclosed attachment A against Nacme Steel Processing.

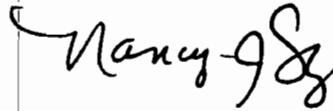
Our office policy is to approach a potential defendant before filing a complaint in an effort to resolve the matter. In your case, an acceptable alternative to litigation would consist of entering into a court enforceable settlement agreement. The settlement agreement would include, among other things, an agreement to cease and desist from future violations of the Illinois Environmental Protection Act ("Act") and related regulations, and payment of a civil penalty. Section 42 of the Act, 415 ILCS 5/42, provides for penalties up to \$50,000.00 per violation plus \$10,000.00 per day each violation continued.

In addition, if we discuss settlement at some point in our future communications, please be advised that no settlement discussion(s) and proposed settlement term(s) are ever final or accepted until and unless approved by the management of our office and the management of the Illinois EPA. Furthermore, any settlement to resolve this or any pending action whether filed in the courts or with the Pollution Control Board must be in writing, memorialized in a Stipulation and Proposal for Settlement or Consent Order, fully executed by all the parties or their duly authorized representatives, and the Illinois EPA by its duly authorized representative. Only after such Stipulation and Proposal for Settlement is accepted by the Illinois Pollution Control Board

through the issuance of a Board Order, or after entry by the Court of the Consent order does such settlement documents become enforceable Orders.

The Office of the Illinois Attorney General offers you the opportunity to meet with representatives of this Office and the Illinois EPA to resolve this matter. A meeting is scheduled for Tuesday, January 24, 2012 at 1:30 p.m. at our office located at 69 West Washington Street, Suite 1800, Chicago. Please call to confirm your attendance by Friday January 20, 2012. If you do not respond to this letter, then a formal complaint will be filed without resolving the matter.

Sincerely,



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

Enc. Attachment A
c. Maureen Wozniak, Legal Counsel, Illinois EPA

Violation Notice A-2010-00151

Nacme Steel Processing LLC, I.D. 031600FWL

ATTACHMENT A

Per observations by George Ordija on September 28, 2010, and other available information:

VIOLATIONS:

1. Section 39.5(6)(b) of the Act: Nacme Steel Processing may have potential hydrogen chloride (HCl) emissions greater than 10 tons per year and may be required to obtain a Clean Air Act Permit Program (CAAPP) permit or Federally Enforceable State Operating Permit (FESOP). Nacme Steel Processing may have failed to timely file a CAAPP permit application and may now operate without the required CAAPP permit.
2. Section 9(b) of the Act and standard condition 7 of operating permit 96020074: Nacme Steel Processing LLC failed to maintain the enclosure and associated scrubber exhaust piping on the four stage washer.
3. Section 9(b) of the Act and condition 2 of operating permit 96020074: Nacme Steel Processing LLC may have exceeded the HCl emissions limits delineated in condition 2 of operating permit 96020074.
4. Section 9(b) of the Act and condition 6(b) of operating permit 96020074: Nacme Steel Processing LLC failed to continuously monitor the pickling solution temperature.
5. Section 9(b) of the Act and condition 6(c) of operating permit 96020074: Nacme Steel Processing LLC failed to continuously monitor the HCl makeup rate.
6. Section 9(b) of the Act and condition 7(b) of operating permit 96020074: Nacme Steel Processing LLC failed to maintain records of the hydrochloric acid usage.
7. Section 9(b) of the Act and condition 7(c) of operating permit 96020074: Nacme Steel Processing LLC failed to maintain records of the pickling line operating hours.
8. Section 9(b) of the Act and condition 9 of operating permit 96020074: Nacme Steel Processing LLC failed to submit exceedance reports to the Illinois EPA, Bureau of Air, Compliance Section.

Exhibit D

AGENCY CONFIDENTIAL

PERMIT REVIEW TRAVELER SHEET



I.D. # 031600FWL Company Name NAACME LLC DIV. OF NATIONAL MATERIALS L.P. Date Rec'd 11-13-00
 Appl. # 916020074 Location CHICAGO Analyst _____
 LEGAL _____ FOS FLAG _____ CROPA _____ NSP/SHAP _____ M&M _____ TOXICS _____
 CAAPP FESOP OPERATING PERMIT APP. CONSTRUCTION PERMIT APP. JOINT CONSTRUCTION/OPERATION APP
 R 11-22-00 BK
I/O Date/Initial

Project Emissions Data (Tons/Year)

S02	NOx	TSP	VOM	CO	OTHER	Is Project Subject to NSPS/NESHAP:	Yes	No
						Is Project a Major Source or Major Modification:	<input type="checkbox"/>	<input type="checkbox"/>
POT						- If Yes, Complete Major Source Traveler Sheet Is A public Comment Period Required:	<input type="checkbox"/>	<input type="checkbox"/>
ACT						- If Yes, Complete Public Participation Section Could Project Be Significant Under Crop:	<input type="checkbox"/>	<input type="checkbox"/>
						- If Yes, Complete CROPA Section	<input type="checkbox"/>	<input type="checkbox"/>

Project Emissions Recorded Date Init. Emission Credits Recorded Date Init.

CROPA/FESOP Notif. Proj. Summary To/From: BOL _____ PWS _____ WPC _____ DLC _____ USEPA _____
 CAAPP Tracking
 Reply From: BOL Significant Not Sign. PWS Significant Not Sign. BOW Significant Not Sign.
 DLC Significant Not Sign. USEPA Significant Not Sign.
 CROPA is Not Applicable/Applicable to this Project
 CPR Project Coordinator: _____ Division: _____

Public Participation	DATE	DATE
Memo to Community Relations Group	_____	Comment Period Completed _____
Comment Period Initiated	_____	Comments/Hearing Records Reviewed _____
Public Hearing Req./Not Req. If Req. Public Hearing Date	_____	Public Participation Completed _____

Review Action Applicability Determ. Form Completed

Special Reviews Requested of: _____

	Analyst	Unit Mgr.	Special Rev.
<input type="checkbox"/> Completeness/ Incompleteness	_____	_____	_____
<input type="checkbox"/> Confidential Review	_____	_____	_____
<input type="checkbox"/> Request Add'l Info.	_____	_____	_____
<input type="checkbox"/> Permit Not Required	_____	_____	_____
<input type="checkbox"/> Reject	_____	_____	_____
<input type="checkbox"/> Deny	_____	_____	_____
<input checked="" type="checkbox"/> Grant	<u>VJB 2/15/01</u>	<u>MM</u>	<u>2/1/01</u>

Forms: _____

Mail-Out District USEPA Health Depart. Enf Public Participation List
 Cook County Other Barry Beckstead Compliance
 Date: 2/9/2001 Init. B.C. Date: _____ Init. _____

BA

AGENCY CONFIDENTIAL

PERMIT REVIEW TRAVELER SHEET

I.D. # 031600FWL Company Name NARME LLC DIV./MAT. LP. Date Rec'd 7-27-00
Appl. # 96020074 Location CHICAGO Analyst _____

LEGAL _____ FOS FLAG _____ CROPA _____ NSP/SHAP _____ M&M _____ TOXICS _____
 CAAPP FESOP OPERATING PERMIT APP. CONSTRUCTION PERMIT APP. JOINT CONSTRUCTION/OPERATION APP
R 7-7-00 BA
I/O Date/Initial

Project Emissions Data (Tons/Year)
S02 NOx TSP VOM CO OTHER Is Project Subject to NSPS/NESHAP: Yes No
Is Project a Major Source or Major Modification: Yes No
- If Yes, Complete Major Source Traveler Sheet
Is A public Comment Period Required: Yes No
- If Yes, Complete Public Participation Section
Could Project Be Significant Under Crop: Yes No
- If Yes, Complete CROPA Section
Project Emissions Recorded Date _____ Init. _____ Emission Credits Recorded Date _____ Init. _____

CROPA/FESOP Notif. Proj. Summary To/From: BOL _____ PWS _____ WPC _____ DLC _____ USEPA _____
CAAPP Tracking
Reply From: BOL Significant Not Sign. PWS Significant Not Sign. BOW Significant Not Sign.
DLC Significant Not Sign. USEPA Significant Not Sign.
CROPA is Not Applicable/Applicable to this Project
CPR Project Coordinator: _____ Division: _____

Public Participation
DATE _____ DATE _____
Memo to Community Relations Group _____ Comment Period Completed _____
Comment Period Initiated _____ Comments/Hearing Records Reviewed _____
Public Hearing Req./Not Req. _____ Public Participation Completed _____
If Req. Public Hearing Date _____

Review Action Applicability Determ. Form Completed
 Special Reviews Requested of: _____
Analyst Unit Mgr. Special Rev.
 Completeness/ Incompleteness _____
 Confidential Review _____
 Request Add'l Info. VJB 8/29/00 VJB 8/29/00 _____
 Permit Not Required _____
 Reject _____
 Deny _____
 Grant VJB 10/24/00 X 10/24/00 _____
FORMS:

Mail-Out District USEPA Health Depart Ch. Dept Enf Public Participation List
 Cook County Other GARY Beckstead Bob Sharpe Julie Armitage
Date: 8/29/2000 Unit. B.C. Date: 10/24/2000 Init. B.C.

BA

AGENCY CONFIDENTIAL

PERMIT REVIEW TRAVELER SHEET

I.D. # 031600FWL Company Name NACME LLC DIV. LP Date Rec'd 2-22-00
 Appl. # 96020074 Location CHICAGO Analyst _____
 LEGAL _____ FOS FLAG _____ CROPA _____ NSP/SHAP _____ M&M _____ TOXICS _____
 CAAPP FESOP OPERATING PERMIT APP. CONSTRUCTION PERMIT APP. JOINT CONSTRUCTION/OPERATION APP
 I/O Date/Initial 2-29-00 RSN

Project Emissions Data (Tons/Year)

S02	NOx	TSP	VOM	CO	OTHER
					<u>NOx-009</u>

Is Project Subject to NSPS/NESHAP: Yes No
 Is Project a Major Source or Major Modification: Yes No
 If Yes, Complete Major Source Traveler Sheet
 Is A public Comment Period Required: Yes No
 - If Yes, Complete Public Participation Section
 Could Project Be Significant Under Crop: Yes No
 - If Yes, Complete CROPA Section

Project Emissions Recorded
 Emission Credits Recorded

CROPA/FESOP Notif. Proj. Summary To/From: BOL _____ PWS _____ WPC _____ DLC _____ USEPA _____
 CAAPP Tracking
 Reply From: BOL Significant Not Sign. PWS Significant Not Sign. BOW _____ Significant Not Sign.
 DLC Significant Not Sign. USEPA _____ Significant Not Sign.
 CROPA is Not Applicable/Applicable to this Project
 CPR Project Coordinator: _____ Division: _____

Public Participation

	DATE	DATE
Memo to Community Relations Group	_____	Comment Period Completed _____
Comment Period Initiated	_____	Comments/Hearing Records Reviewed _____
Public Hearing Req./Not Req. If Req. Public Hearing Date	_____	Public Participation Completed _____

Review Action Applicability Determ. Form Completed

Special Reviews Requested of: _____

	Analyst	Unit Mgr.	Special Rev.
<input type="checkbox"/> Completeness/ Incompleteness	_____	_____	_____
<input type="checkbox"/> Confidential Review	_____	_____	_____
<input type="checkbox"/> Request Add'l Info.	_____	_____	_____
<input type="checkbox"/> Permit Not Required	_____	_____	_____
<input type="checkbox"/> Reject	_____	_____	_____
<input type="checkbox"/> Deny	_____	_____	_____
<input checked="" type="checkbox"/> Grant	<u>VTA</u>	<u>ST/500</u>	<u>ST/150</u>

Forms: _____

Mail-Out District USEPA Health Dept Chic DEC Enf Public Participation List
 Cook County Other Gay Bechtold Compliance
 Date: 5/16/2000 Init. B.C. Date: _____ Init. _____

BH

AGENCY CONFIDENTIAL

PERMIT REVIEW TRAVELER SHEET

I.D. # 031600FWL Company Name National Materials L.P. Date Rec'd 2/20/96
 Appl. # 96020074 Location Chicago Analyst _____
 LEGAL _____ FOS FLAG _____ CROPA _____ NSP/SHAP _____ M&M _____ TOXICS _____
 CAAPP FESOP OPERATING PERMIT APP. CONSTRUCTION PERMIT APP. JOINT CONSTRUCTION/OPERATION APP
 I/O Date/Initial 2/22/96 mmmm

Project Emissions Data (Tons/Year)

S02	NOx	TSP	VOM	CO	OTHER	Is Project Subject to NSPS/NESHAP:	<input type="checkbox"/> Yes <input type="checkbox"/> No
						Is Project a Major Source or Major Modification:	<input type="checkbox"/> Yes <input type="checkbox"/> No
POT		<u>3.15</u>				- If Yes, Complete Major Source Traveler Sheet	<input type="checkbox"/> Yes <input type="checkbox"/> No
ACT		<u>3.15</u>				Is A public Comment Period Required:	<input type="checkbox"/> Yes <input type="checkbox"/> No
						- If Yes, Complete Public Participation Section	<input type="checkbox"/> Yes <input type="checkbox"/> No
						Could Project Be Significant Under Crop:	<input type="checkbox"/> Yes <input type="checkbox"/> No
						- If Yes, Complete CROPA Section	<input type="checkbox"/> Yes <input type="checkbox"/> No

Project Emissions Recorded 4/19/96 sa Emission Credits Recorded _____
 Date Init. _____ Date Init. _____

CROPA/FESOP Notif. Proj. Summary To/From: BOL _____ PWS _____ WPC _____ DLC _____ USEPA _____
 CAAPP Tracking Significant Significant Significant
 Reply From: BOL Not Sign. PWS Not Sign. BOW Not Sign.
 DLC Significant Significant Significant
 USEPA Not Sign. Not Sign. Not Sign.
 CROPA is Not Applicable/Applicable to this Project
 CPR Project Coordinator: _____ Division: _____

Public Participation

	DATE	DATE
Memo to Community Relations Group	_____	Comment Period Completed _____
Comment Period Initiated	_____	Comments/Hearing Records Reviewed _____
Public Hearing Req./Not Req. If Req. Public Hearing Date	_____	Public Participation Completed _____

Review Action Applicability Determ. Form Completed

Special Reviews Requested of: _____

	Analyst	Unit Mgr.	Special Rev.
<input type="checkbox"/> Completeness/ Incompleteness	_____	_____	_____
<input type="checkbox"/> Confidential Review	_____	_____	_____
<input type="checkbox"/> Request Add'l Info.	_____	_____	_____
<input type="checkbox"/> Permit Not Required	_____	_____	_____
<input type="checkbox"/> Reject	_____	_____	_____
<input type="checkbox"/> Deny	_____	_____	_____
<input checked="" type="checkbox"/> Grant	<u>BSR 4/15/96</u>	<u>MSR 4/17/96</u>	<u>Jan 4/18/96</u>

Forms: _____

Mail-Out District USEPA Health Depart Chic DEC Enf Public Participation List
 Cook County Other _____
 Date: 4-17-96 Init. B.E Date: _____ Init. _____

10000
1/11/96

AGENCY CONFIDENTIAL

PERMIT REVIEW TRAVELER SHEET

I.D. # 031600FWL Company Name NACME STEEL PROCESSING LLC Date Rec'd 9-12-05
 Appl. # 96020074 Location CHICAGO Analyst _____
RQPS: NAOUR, EXP. 12-31-05
 LEGAL _____ FOS FLAG _____ CROPA _____ NSP/SHAP _____ M&M _____ TOXICS _____
 CAAPP FESOP OPERATING PERMIT APP. CONSTRUCTION PERMIT APP. JOINT CONSTRUCTION/OPERATION APP
 I/O Date/Initial 9-14-05 BJD

Project Emissions Data (Tons/Year)

SO2	NOx	TSP	VOM	CO	OTHER

Is Project Subject to NSPS/NESHAP: Yes No
 Is Project a Major Source or Major Modification: Yes No
 - If Yes, Complete Major Source Traveler Sheet
 Is A public Comment Period Required: Yes No
 - If Yes, Complete Public Participation Section
 Could Project Be Significant Under Crop: Yes No
 - If Yes, Complete CROPA Section

Project Emissions Recorded Date _____ Init. _____ Emission Credits Recorded Date _____ Init. _____

CROPA/FESOP Notif. Proj. Summary To/From: BOL _____ FWS _____ WPC _____ DLC _____ USEPA _____
 CAAPP Tracking
 Reply From: BOL Significant Not Sign. FWS Significant Not Sign. BOW Significant Not Sign.
 DLC Significant Not Sign. USEPA Significant Not Sign.
 CROPA is Not Applicable/Applicable to this Project
 CFR Project Coordinator: _____ Division: _____

Public Participation	DATE	DATE
Memo to Community Relations Group	_____	Comment Period Completed _____
Comment Period Initiated	_____	Comments/Hearing Records Reviewed _____
Public Hearing Req./Not Req. If Req. Public Hearing Date	_____	Public Participation Completed _____

Review Action Applicability Determ. Form Completed

Special Reviews Requested of: _____

	Analyst	Unit Mgr.	Special Rev.
<input type="checkbox"/> Completeness/ Incompleteness	_____	_____	_____
<input checked="" type="checkbox"/> Confidential Review	_____	_____	_____
<input type="checkbox"/> Request Add'l Info.	_____	_____	_____
<input type="checkbox"/> Permit Not Required	_____	_____	_____
<input checked="" type="checkbox"/> Reject	<u>VJB 9/21/05</u>	<u>RUB 9/22/05</u>	_____
<input type="checkbox"/> Deny	_____	_____	_____
<input type="checkbox"/> Grant	_____	_____	_____

Forms: _____

Mail-Out District USEPA Health Dept Chi. DEP Enf Public Participation List
 Cook County Other _____
 Date: 9/22/05 Init. B.C. Date: _____ Init. _____

A copy of the NOI letter has been e-mailed to CES, RUB BJD

AGENCY CONFIDENTIAL

PERMIT REVIEW TRAVELER SHEET

I.D. # 031600FWL Company Name NACME STEEL PROCESSING LLC Date Rec'd 4-4-05
 Appl. # 96020074 Location CHICAGO Analyst _____
 AQPS: NMOUR, EXP. 12-31-05

LEGAL _____ FOS FLAG _____ CROPA _____ NSP/SHAP _____ M&M _____ TOXICS _____
 CAAPP FESOP OPERATING PERMIT APP. CONSTRUCTION PERMIT APP. JOINT CONSTRUCTION/OPERATION APP

4-4-05 B9D
I/O Date/Initial

Project Emissions Data (Tons/Year)

S02	NOx	TSP	VOM	CO	OTHER	Is Project Subject to NSPS/NESHAP:	<input type="checkbox"/> Yes <input type="checkbox"/> No
						Is Project a Major Source or Major Modification:	<input type="checkbox"/> Yes <input type="checkbox"/> No
<u>POT</u>						- If Yes, Complete Major Source Traveler Sheet Is A public Comment Period Required:	<input type="checkbox"/> Yes <input type="checkbox"/> No
<u>ACT</u>						- If Yes, Complete Public Participation Section Could Project Be Significant Under Crop:	<input type="checkbox"/> Yes <input type="checkbox"/> No
						- If Yes, Complete CROPA Section	<input type="checkbox"/> Yes <input type="checkbox"/> No

Project Emissions Recorded
 Emission Credits Recorded

CROPA/FESOP _____ Notif. Proj. Summary To/From: BOL _____ PWS _____ WPC _____ DLC _____ USEPA _____
 CAAPP Tracking Significant Significant Significant
 Reply From: BOL _____ Not Sign. PWS _____ Not Sign. BOW _____ Not Sign.
 DLC _____ Significant Significant Significant
 USEPA _____ Not Sign. USEPA _____ Not Sign.

CROPA is Not Applicable/Applicable to this Project
 CPR Project Coordinator: _____ Division: _____

Public Participation

	DATE	DATE
Memo to Community Relations Group	_____	Comment Period Completed _____
Comment Period Initiated	_____	Comments/Hearing Records Reviewed _____
Public Hearing Req./Not Req. If Req. Public Hearing Date	_____	Public Participation Completed _____

Review Action Applicability Determ. Form Completed

Special Reviews Requested of: _____

	Analyst	Unit Mgr.	Special Rev.
<input type="checkbox"/> Completeness/ Incompleteness	_____	_____	_____
<input type="checkbox"/> Confidential Review	_____	_____	_____
<input type="checkbox"/> Request Add'l Info.	_____	_____	_____
<input type="checkbox"/> Permit Not Required	_____	_____	_____
<input checked="" type="checkbox"/> Reject	<u>LTB 4/13/05</u>	<u>ZUB 4/13/05</u>	_____
<input type="checkbox"/> Deny	_____	_____	_____
<input type="checkbox"/> Grant	_____	_____	_____

Forms: _____

Mail-Out District USEPA Health Dept Chi DEC Enf Public Participation List
 Cook County Other _____
 Date: 4/13/05 Init. B.C Date: _____ Init. _____

A copy of the N.O. has been e-mailed to [Signature] B9D

Exhibit E



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/782-2113

CERTIFIED MAIL
7004 2510 0001 8648 0284

NOTICE OF INCOMPLETENESS

September 20, 2005

NACME Steel Processing, LLC
Attn: John Dubrock
429 West 127th Street
Chicago, Illinois 60628

Application No.: 96020074
I.D. No.: 031600FWL
Applicant's Designation:
Date Received: 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:

1. 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.
2. 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 $33.3 \text{ tons/hr} \times 8,760 \text{ hr/yr} = 292,000 \text{ tons/yr}$.

3. 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.

Exhibit F



CALCULATION SHEET

Facility NACME Steel Processing		I.D. 031600FWL
Anal. Eng. VJB	Date 10-23-2000	PN 96020074
Rev. Eng.	Date	Date Rec. 07-27-1999

1. The application for an operating permit revision.
2. The traveler sheet has no marks.
3. The company requests a revision to their joint C&O permit to allow them an increase in HCl emission from the steel pickling line from 0.02 lb/hr to 0.52 lb/hr. The company had several accidents of HCl release and was subject to Cook county environmental department investigation and were forced to perform another stack test which showed much higher emission rate than previous one. During the review of the application it came to attention that NACME Steel is located in close proximity to Acme Steel Company, Title V source, from which it received significant part (if not all) of their steel coils to be pickled. Per Ill. Env. Prot. Act, Section 39.5(1) NACME constitutes a support facility to Acme and as such should also apply for Title V permit. In the response to the Well's letter the company failed to substantiate their independent status.

This determination also triggers applicability of NESHAP, Subpart CCC since Acme is a major source of HAP emissions. Compliance shall be demonstrated by June 22, 2001.

Average HCl emission during the stack test was 0.328 lb/hr and steel process rate was 69 T/hr. Emission Factor: $0.328/69 = 0.00475 \text{ lb/T} = 4.8 \text{ lb}/10^3 \text{ T}$.

The following are production, operational and emission limitations:

<u>Steel Throughput</u>		<u>Emission Factor</u>	<u>HCl Emission</u>	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Lb/10³ Ton)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
55,000	600,000	4.8	240	1.4

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.

The company also operates coil coater using heavy lubricant oil. Per MSDS is in compliance with 218.204(j). VOM emissions are negligible.

4. It is recommended to grant the operating permit for 5 years limiting hydrogen chloride emissions to maximum actual. Please note on being subject to Title V and NESHAP.

Exhibit G

From: Bob Hutton
To: Armitage, Julie; Brodsky, Valery; Hatch, Marcus; Patel, Kunj; Preshall, Chris
Date: 9/13/00 1:37PM
Subject: Re: Fwd: NACME Steel Processing

FYI: The City of Chicago was/is implementing a Consent Order w/ NACME which requires, among other things, installation of an HCl CEMS. We assisted the City by providing technical information (e.g., performance specifications, costs, vendors, etc.). Recently, Marcus found that an HCl CEMS was already in place at NACME. From his observations, that data being reported is highly suspect (much too low). SMU has no record of this unit - no idea it existed. Any HCl concentration data provided by NACME should be thoroughly investigated and verified. I know some stack test data is available which may or may not be valid but any data based on their CEMS is probably worthless.

Robert Hutton
Illinois EPA
epa2206@epa.state.il.us
(217)782-9281

>>> Julie Armitage 09/13/00 11:24AM >>>

yes, Chris and I noted that in our comments on the Vn and I believe the issue appeared in the Wells letter the permit section sent. our position, however, is that Nacme is a major source of HAPS as it is part of Acme Steel and should be cited accordingly. Pls ask Hank for the concentration level that NACme is committed to and the level it must not exceed as we should craft an alternative citation for this if our major source theory flops on us. Kunj, pls send a redraft back by me ASAP thanks.

>>> Kunj Patel 09/13/00 09:53AM >>>

Does this means that facility is in violations of NESHAP standards too?

Exhibit H



CALCULATION SHEET

Facility NACME Steel Processing		LD. 031600FWL
Anal. Eng. VJB	Date 05-15-2000	PN 96020074
Rev. Eng.	Date	Date Rec. 02-22-1999

1. The application for an ^{ce} operating permit.

2. The traveler sheet has no marks.

3. The company requests an operating permit to be issued following a construction permit issued for the steel pickling line. These operations are not subject to NESHAP, Subpart CCC due to HCl emission being less than 10 T/yr. The company performed stack test which showed very low HCl emission, 0.02 lb/hr, and very high scrubber efficiency, 99.9%. The capture efficiency evaluation was not performed and it is not required under NESHAP. Based on the pickling line description in the field inspector's report and stack test summary it may be assumed that pickling line is completely enclosed and qualify for the total enclosure, 100% capture efficiency.

The company also operate two natural gas fired boilers rated at 6.9 mmbtu/hr (construction permit 95070033)- eligible for exemption.

4. It is recommended to grant the lifetime operating permit limiting hydrogen chloride emissions to negligible.

Exhibit I



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

INVOICE

DIVISION OF AIR POLLUTION CONTROL
ANNUAL TITLE V PERMIT FEE

October 31, 2010

William Reichel
NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

Site to which fee applies
Id: 031600FWL

NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

This is your annual Air Pollution Control Title V Permit Fee invoice. If balance is due, make either check or money order payable to: "Illinois Environmental Protection Agency".

In accordance with the Environmental Protection Act Section 18(iiB): Except for the first year of the CAAPP the applicant or permittee may pay the fee annually or semiannually for those fees greater than \$5,000. If you elect to pay annually or semiannually, the annual fee or one-half of the annual fee and any balance forward is due December 15, 2010.

In order to ensure the proper crediting of your account, you must return one copy of this invoice with payment in the envelope provided. If you have any questions, please contact the Air, Permit Section at the above address or telephone 217/782-2113 within 45 days.

FUND	DESCRIPTION	AMOUNT
0091	Annual Fee	\$1,800.00
	Balance Due	\$1,800.00

Please provide the following information:

Amount Enclosed \$ _____

Please indicate designated site Id Number 031600FWL on your check and return one copy of this invoice with payment.

This Title V permit fee bill does not constitute final Illinois EPA action on any pending application for initial, renewal or modification of CAAPP permit. Neither the issuance nor payment of this fee bill shall serve to modify any otherwise applicable emission limits in your current CAAPP permit. Any change or modification of the underlying CAAPP permit limits established for fee purposes, if at all, will be effectuated upon issuance of the modified CAAPP permit.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

Division of Air Pollution Control Second Notice

December 16, 2009
William Reichel
NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

Site to which fee applies:
Id: 031600FWL

NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

This notice indicates a fee past due. Please remit amount shown below. Make check or money order payable to: "Illinois Environmental Protection Agency". Complete the requested information and a copy of this invoice for your records. In order to ensure the proper crediting of your account, you must return one copy of this invoice with payment in the envelope provided. If you have any questions, please contact the Air Permit Section at the above address or telephone 217/782-2113.

Original due date: December 15, 2009

FUND	DESCRIPTION	AMOUNT
91	Past Amount Due	\$1,800.00
	Balance Due	\$1,800.00

Please provide the following information:

Amount enclosed \$ _____

Please indicate designated site id number 031600FWL on your check and return one copy of this invoice with payment.

This Title V permit fee bill does not constitute final Illinois EPA action on any pending application for initial, renewal or modification of CAAPP permit. Neither the issuance nor payment of this fee bill shall serve to modify any otherwise applicable emission limits in your current CAAPP permit. Any change or modification of the underlying CAAPP permit limits established for fee purposes, if at all, will be effectuated upon issuance of the modified CAAPP permit.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

INVOICE

DIVISION OF AIR POLLUTION CONTROL ANNUAL TITLE V PERMIT FEE

October 31, 2009

William Reichel
NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

Site to which fee applies
Id: 031600FWL

NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

This is your annual Air Pollution Control Title V Permit Fee invoice. If balance is due, make either check or money order payable to: "Illinois Environmental Protection Agency".

In accordance with the Environmental Protection Act Section 18(IIB): Except for the first year of the CAAPP the applicant or permittee may pay the fee annually or semiannually for those fees greater than \$5,000. If you elect to pay annually or semiannually, the annual fee or one-half of the annual fee and any balance forward is due December 15, 2009.

In order to ensure the proper crediting of your account, you must return one copy of this invoice with payment in the envelope provided. If you have any questions, please contact the Air, Permit Section at the above address or telephone 217/782-2113 within 45 days.

FUND	DESCRIPTION	AMOUNT
0091	Annual Fee	\$1,800.00
	Balance Due	\$1,800.00

Please provide the following information:

Amount Enclosed \$ _____

Please indicate designated site Id Number 031600FWL on your check and return one copy of this invoice with payment.

This Title V permit fee bill does not constitute final Illinois EPA action on any pending application for initial, renewal or modification of CAAPP permit. Neither the issuance nor payment of this fee bill shall serve to modify any otherwise applicable emission limits in your current CAAPP permit. Any change or modification of the underlying CAAPP permit limits established for fee purposes, if at all, will be effectuated upon issuance of the modified CAAPP permit.



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

INVOICE
DIVISION OF AIR POLLUTION CONTROL
ANNUAL TITLE V PERMIT FEE

October 31, 2008
William Reichel
NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

Site to which fee applies
Id: 031600FWL

NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

This is your annual Air Pollution Control Title V Permit Fee invoice. If balance is due, make either check or money order payable to: "Illinois Environmental Protection Agency".

In accordance with the Environmental Protection Act Section 18(iiB): Except for the first year of the CAAPP the applicant or permittee may pay the fee annually or semiannually for those fees greater than \$5,000. If you elect to pay annually or semiannually, the annual fee or one-half of the annual fee and any balance forward is due December 15, 2008.

In order to ensure the proper crediting of your account, you must return one copy of this invoice with payment in the envelope provided. If you have any questions, please contact the Air, Permit Section at the above address or telephone 217/782-2113 within 45 days.

FUND	DESCRIPTION	AMOUNT
0091	Annual Fee	\$1,800.00
	Balance Due	<u>\$1,800.00</u>

Please provide the following information:

Amount Enclosed \$ _____

Please indicate designated site Id Number 031600FWL on your check and return one copy of this invoice with payment.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

fsop

217/785-5151

**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. If such additional information affects your allowable emission limits, a revised form 292-CAAPP-FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the 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,

COPY

Original Signed by
Donald E. Sutton, P.E.

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

DES:YMC:psj

Enclosure(s)

cc: FOS, Region 1
Application File
Compliance & Systems Management Section



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

**INVOICE
DIVISION OF AIR POLLUTION CONTROL
INITIAL TITLE V PERMIT FEE**

December 6, 2005

William Reichel
NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

Site to which fee applies
Id: 031600FWL

NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

This is your initial Air Pollution Control Title V Permit Fee invoice. If balance is due, make either check or money order payable to: "Illinois Environmental Protection Agency".

In accordance with the Environmental Protection Act Section 18(iiB): Except for the first year of the CAAPP the applicant or permittee may pay the fee annually or semiannually for those fees greater than \$5,000. If you elect to pay annually or semiannually, the initial fee or one-half of the initial fee and any balance forward is due January 20, 2006.

In order to ensure the proper crediting of your account, you must return one copy of this invoice with payment in the envelope provided. If you have any questions, please contact the Air, Permit Section at the above address or telephone 217/782-2113 within 45 days.

FUND	DESCRIPTION	AMOUNT
0944	Credit for Unused Previously Paid State Fee	\$117.00CR
0091	Initial Fee	\$1,800.00

	Balance Due	\$1,683.00

Please provide the following information:

Amount Enclosed \$ _____

Please indicate designated site Id Number 031600FWL on your check and return one copy of this invoice with payment.



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

INVOICE
DIVISION OF AIR POLLUTION CONTROL
ANNUAL TITLE V PERMIT FEE

October 31, 2006

William Reichel
NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

Site to which fee applies
Id 031600FWL

NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

This is your annual Air Pollution Control Title V Permit Fee invoice. If balance is due, make either check or money order payable to: "Illinois Environmental Protection Agency".

In accordance with the Environmental Protection Act Section 18(iiB): Except for the first year of the CAAPP the applicant or permittee may pay the fee annually or semiannually for those fees greater than \$5,000. If you elect to pay annually or semiannually, the annual fee or one-half of the annual fee and any balance forward is due December 15, 2006.

In order to ensure the proper crediting of your account, you must return one copy of this invoice with payment in the envelope provided. If you have any questions, please contact the Air, Permit Section at the above address or telephone 217/782-2113 within 45 days.

Table with 2 columns: FUND DESCRIPTION and AMOUNT. Row 1: 0091 Annual Fee \$1,800.00. Row 2: Balance Due \$1,800.00.

Please provide the following information:

Amount Enclosed \$ _____

Please indicate designated site Id Number 031600FWL on your check and return one copy of this invoice with payment.



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

**INVOICE
DIVISION OF AIR POLLUTION CONTROL
ANNUAL TITLE V PERMIT FEE**

October 31, 2007

William Reichel
NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

Site to which fee applies
Id: 031600FWL

NACME Steel Processing LLC
429 W 127th St
Chicago, IL 60628

This is your annual Air Pollution Control Title V Permit Fee invoice. If balance is due, make either check or money order payable to: "Illinois Environmental Protection Agency".

In accordance with the Environmental Protection Act Section 18(i)(B): Except for the first year of the CAAPP the applicant or permittee may pay the fee annually or semiannually for those fees greater than \$5,000. If you elect to pay annually or semiannually, the annual fee or one-half of the annual fee and any balance forward is due December 15, 2007.

In order to ensure the proper crediting of your account, you must return one copy of this invoice with payment in the envelope provided. If you have any questions, please contact the Air, Permit Section at the above address or telephone 217/782-2113 within 45 days.

FUND	DESCRIPTION	AMOUNT
0091	Annual Fee	\$1,800.00
	Balance Due	\$1,800.00

Please provide the following information:

Amount Enclosed \$ _____

Please indicate designated site Id Number 031600FWL on your check and return one copy of this invoice with payment.

Exhibit J

⇒ Distribute



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

RENEE CIPRIANO, DIRECTOR

I.D. #: 031600FWL

MEMORANDUM

Name: _____

DATE: August 21, 2002

Prog.: STATE Category: 10

TO: Julie Armitage, Acting Manager, BOA/CES

FROM: Ken Erewele, CES/Compliance

SUBJECT: NACME Steel Processing, LLC Final Test Report
ID 031600FWL Construction Permit No. 01040081

On June 5, 2002, the Illinois EPA received a final test report from NACME Processing, LLC Chicago, Illinois, for emissions testing performed on April 16, 2002, by GE Mostardi Platt.

The objective of this test was to determine the hydrogen chloride (HCl) emissions on the steel pickling line scrubber exhaust stack, pursuant to 40 CFR 63, Subpart CCC and condition 3 of the referenced construction permit.

The emission test was conducted in accordance with USEPA test methods found at 40 CFR 60, Appendix A: Method 1 sampling location selection, method 2 gas flow and velocity, method 3 MW stack gas, method 4 moisture, and method 5 determination of particulate emissions and method 26A, "determination of Hydrogen Halide and Halogen emissions", pursuant to 40 CFR 63.1161(d).

Three (3) one-hour integrated twenty four point HCl samples were collected isokinetically from the gas stream and passed through dilute (0.1N) sulfuric acid. The dissolved HCl and formed chloride ions were analyzed by ion chromatography. The following table summarizes the results.

Parameter	Scrubber Exhaust Stack	Allowable
HCl Emission Rate, lbs/hr	0.217	0.41

Operations of the pickling baths were permitted at 16% hydrochloric acid concentration. Testing was conducted at 12% hydrochloric acid concentration, further, NACME Processing has requested that its permit be modified to accurately reflect the 12 % concentration bath.

The methodologies and general procedures described in the protocol comply with the testing requirements. The compliance section recommends that the BOA accept this test as valid.

Cc: SMU - Desplaines
SMU - Springfield
~~I.D - File~~
Region 1

GEORGE H. RYAN, GOVERNOR