BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE PEOPLE OF ILLINOIS,

Complainant,

v.

PCB No. 13 - 12
(Enforcement — Air)

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

Respondent.

AFFIDAVIT

I, Thomas J. Reuter, being duly sworn on oath, depose and state that I am over 21 years of age, have personal knowledge of the facts stated herein, and, if called as a witness, could competently testify to the following:

1. I am employed by the Illinois Environmental Protection Agency (Illinois EPA), and serve as the Records Officer.

2. As part of my duties, I am responsible for the control, care, and safekeeping of the records of the Illinois EPA located in Springfield, Illinois.

3. When the Illinois EPA receives a document it is directed to the appropriate bureau for distribution and delivery to the designated program manager or staff member for review and action. Following program staff review and an y needed action, documents are submitted to the Agency file and include a file heading consisting of an ID number specifying the site/facility/source location, the site name and a records category. All Agency records are maintained and segregated according to the file heading.

4. I certify the following documents attached to this affidavit are "public documents kept in the file at the Illinois EPA:

1. February 8, 2001 Operating Permit No. 96020074 – Revised ("Nacme's SOP")

2. April 11, 2002 Operating Permit Revision Application – Revised ("2002 Construction Permit Application")

3. April 12, 2002 Construction Permit No. 01040081 – Revised ("2002 Construction Permit")

4. April 16, 2002 Gaseous Emissions Test ("April 2002 Stack Test")

5. May 16, 2002 Permit Denial ("2002 Operating Permit Denial")

6. March 30, 2005 Application for Renewal of Federally Enforceable State Operating Permit submitted by Nacme ("April 2005 SOP Renewal Application")

7. April 13, 2005 Notice of Incompleteness ("April 2005 Notice of Incompleteness")

8. August 23, 2005 Air Emission Operating Permit Source Renewal Application ("September 2005 SOP Renewal Application")

9. September 20, 2005 Notice of Incompleteness ("September 2005 Notice of Incompleteness")

10. October 18, 2005 Renewal Application – Federally Enforceable State Operating Permit ("2005 FESOP Application")

11. December 6, 2005, CAAPP Application Completeness Determination of Source Fee Determination for Nacme's 2005 FESOP Application ("2005 CAAPP Application Completion Determination")

12. December 21, 2006, Hydrogen Chloride Emissions Test Report ("December 2006 Stack Test Report")

13. March 23, 2007 Nacme's Change Request for FESOP Application ("2007 FESOP Application")

14. Construction Permit – NSPS Source No. 12020035 ("2012 Construction Permit")

FURTHER, AFFIANT SAYETH NOT.

Thomas Penter

State of Illinois
County of Sangamon
SUBSCRIBED and SWORN
to before me this 15th day
of May, 2014.

Dawn A. Hollis
NOTARY PUBLIC

OFFICIAL SEAL
DAWN A. HOLLIS
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 8-19-2016

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

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

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506

THOMAS V. SKINNER, DIRECTOR

217/782-2113

OPERATING PERMIT -- REVISED

PERMITTEE

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

Application No.: 96020074 I.D. No.: 031600FWL
Applicant's Designation: PICKLING Date Received: November 13, 2000
Subject: Steel Pickling Plant
Date Issued: February 8, 2001 Expiration Date: October 25, 2005
Location: 429 West 127th Street, Chicago, 60628

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

1. This revised permit becomes effective only upon withdrawal of applicant's appeal to the Illinois Pollution Control, docketed PCB 01-85.

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

Steel Throughput (Tons/Mo)	(Tons/Yr)	Emission Factor (Lb/10^3 Ton)	HCl Emission (Lb/Mo)	(Tons/Yr)
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. Compliance with annual limits shall be determined from a running total of 12 months of data.

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

4. This permit is issued based on negligible emissions of volatile organic material from the oil coater. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

5. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.

6. The Permittee shall monitor the following operational parameters:

   a. HCl concentration in the pickling tanks - every 4 hours;

   b. Pickling solution temperature in each tank - continuously;

   c. HCl makeup rate - continuously;

   d. Scrubber makeup water flow - continuously.

7. The Permittee shall maintain monthly records of the following items:

   a. Steel throughput (Ton/Mo, Ton/Yr)

   b. Hydrochloric acid usage (Gal/Mo, Gal/Yr) and its concentration (Wt.%);

   c. Pickling line operating hours (Hr/Mo, Hr/Yr);

   d. Monitoring devices records;

   e. HCl emission calculations (Lb/Mo, Ton/Yr).

8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA request for records during the course of a source inspection.

9. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

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

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

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

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

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

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

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

DES:VJB:psj

cc: Region 1

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

STANDARD CONDITIONS FOR OPERATING PERMITS

July 1, 1985

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

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

1. The issuance of this permit does not release the permittee from compliance with state and federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.

2. The Agency has issued this permit based upon the information submitted by the permittee in the permit application. Any misinformation, false statement or mispresentation in the application shall be grounds for revocation under 35 Ill. Adm. Code 201.207.

3. a. The permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Agency and unless a new permit or revision of the existing permit(s) is issued for such modification.

   b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.

4. The permittee shall allow any duly authorized agent of the Agency, upon the presentation of credentials, at reasonable times:

   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 to copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

   d. to obtain and remove samples of any discharge or emission of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.

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 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 facilities,

c. does not take into consideration or attest to the structural stability of any unit or part of the project, and

d. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.

6. The facilities covered by this permit shall be operated in such a manner that the disposal of air contaminants collected by the equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

7. The permittee shall maintain all equipment covered under this permit in such a manner that the performance of such equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

8. The permittee shall maintain a maintenance record on the premises for each item of air pollution control equipment. This record shall be made available to any agent of the Environmental Protection Agency at any time during normal working hours and/or operating hours. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9. No person shall cause or allow continued operation during malfunction, breakdown or startup of any emission source or related air pollution control equipment if such operation would cause a violation of an applicable emission standard or permit limitation. Should a malfunction, breakdown or startup occur which results in emissions in excess of any applicable standard or permit limitation, the permittee shall:

   a. immediately report the incident to the Agency's Regional Field Operations Section Office by telephone, telegraph, or other method as constitutes the fastest available alternative, and shall comply with all reasonable directives of the Agency with respect to the incident;

   b. maintain the following records for a period of no less than two (2) years:

      i. date and duration of malfunction, breakdown or startup,

      ii. full and detailed explanation of the cause,

      iii. contaminants emitted and an estimate of quantity of emissions,

      iv. measures taken to minimize the amount of emissions during the malfunction, breakdown or startup, and

      v. measures taken to reduce future occurrences and frequency of incidents.

10. If the permit application contains a compliance program and project completion schedule, the permittee shall submit a project completion status report within thirty (30) days of any date specified in the compliance program and project completion schedule or at six month intervals, whichever is more frequent.

11. The Permittee shall submit an Annual Emission Report as required by 35 Ill. Adm. Code. 201.302 and 35 Ill. Adm. code Part 254.

Environmental Protection Agency
Bureau of Air

September 1, 1992

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

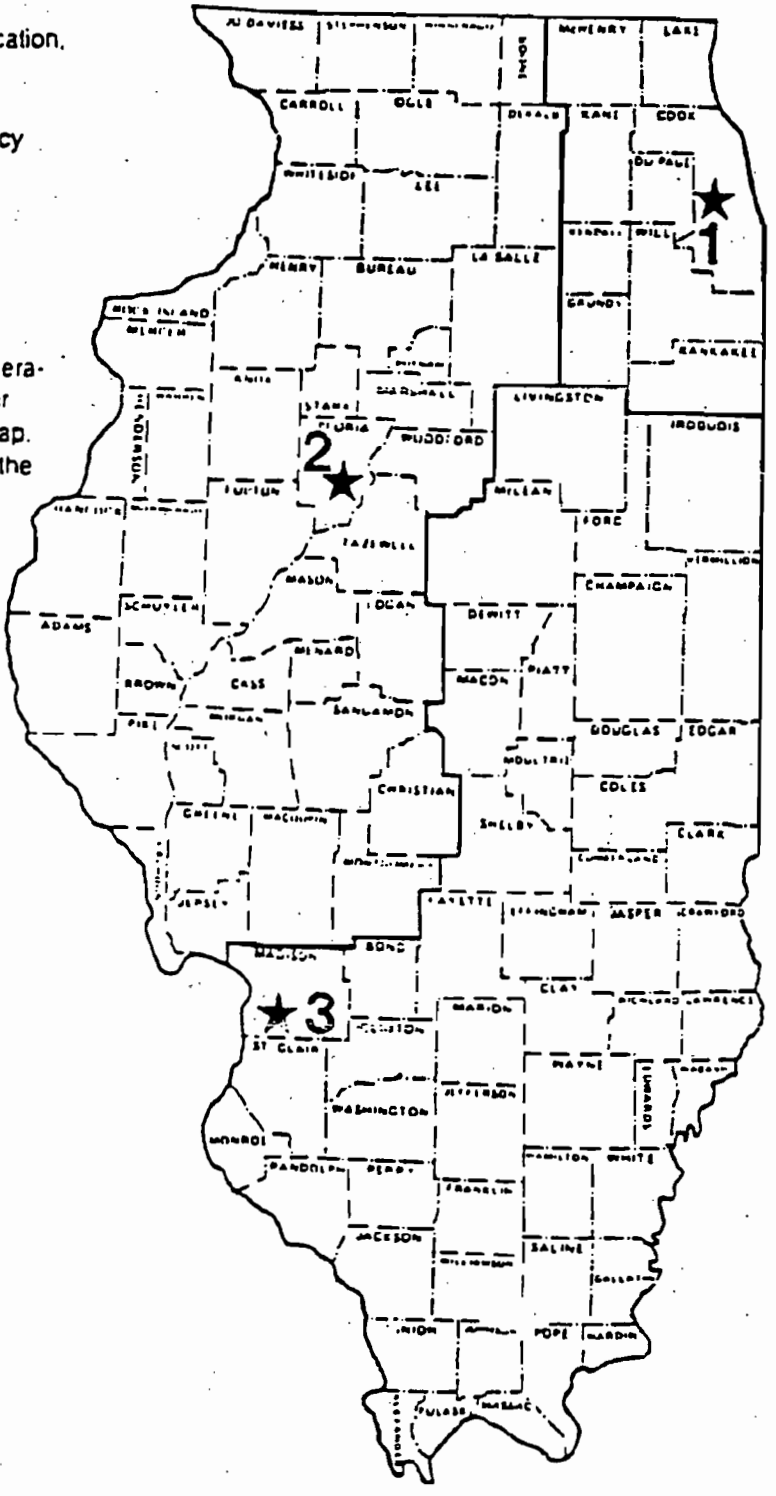
Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
2200 Churchill Road
Springfield, Illinois 62706
217/782-2113

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

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

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

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



Printed on Recycled Paper

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

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

b.c.

IBD 5/22/00 → H. Dosai

N

April 11, 2002

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

Dear Mr. Sutton:

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

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

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

NACME STEEL PROCESSING L.L.C.

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

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

Sincerely,

NACME STEEL PROCESSING

Thomas Beach
Vice President & General Manager

TB/

Enclosure

429 West 127th Street • Chicago, Illinois 60628
Phone: 773-468-2800 • Fax: 773-468-2868

Mostardi Platt
Environmental

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

AIR EMISSION SOURCE OPERATING PERMIT REVISION APPLICATION

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

April 11, 2002

MOSTARDI PLATT PROJECT M026002

TABLE OF CONTENTS

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

APPLICATION FOR PERMIT(A) ☐ CONSTRUCT ☒ OPERATE NAME OF EQUIPMENT TO BE CONSTRUCTED OR OPERATED (B): HCL Steel Pickling Line, HCL-ASTs	FOR AGENCY USE ONLY I.D. NO. 031600FWL PERMIT NO. 96020074 DATE 4/12/02

1a. NAME OF OWNER: National Materials, LP		2a. NAME OF OPERATOR: NACME Steel Processing, LLC	
1b. STREET ADDRESS OF OWNER: 1965 Pratt Boulevard		2b. STREET ADDRESS OF OPERATOR: 429 West 127th Street	
1c. CITY OF OWNER: Elk Grove Village		2c. CITY OF OPERATOR: Chicago	
1d. STATE OF OWNER: Illinois	1e. ZIP CODE: 60007	2d. STATE OF OPERATOR: Illinois	2e. ZIP CODE: 60628

3a. NAME OF CORPORATE DIVISION OR PLANT: NACME Steel Processing		3b. STREET ADDRESS OF EMISSION SOURCE: 429 West 127th Street		
3c. CITY OF EMISSION SOURCE: Chicago	3d. LOCATED WITHIN CITY LIMITS: ☒ YES ☐ NO	3e. TOWNSHIP:	3f. COUNTY: Cook	3g. ZIP CODE: 60628

4. ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) Tom Beach	5. TELEPHONE NUMBER FOR AGENCY TO CALL: 773-291-1303
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE) ☐ OWNER ☒ OPERATOR ☐ EMISSION SOURCE	7. YOUR DESIGNATION FOR THIS APPLICATION:(C) Pickling

8. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATIONS REMAINS TRUE, CORRECT AND CURRENT, BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

RECEIVED
APR 12 2002
IEPA - DAPC - SPFLD

AUTHORIZED SIGNATURE(S):(D)

BY Thomas Beach — SIGNATURE
4/11/02 — DATE
Thomas Beach — TYPED OR PRINTED NAME OF SIGNER
Vice President, and General Manager — TITLE OF SIGNER

BY _____ — SIGNATURE
_____ — TYPED OR PRINTED NAME OF SIGNER
_____ — TITLE OF SIGNER

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS FORM MAY BE USED TO REQUEST A CONSTRUCTION PERMIT, AN OPERATING PERMIT, A CONSTRUCTION OR OPERATING PERMIT.

(B) ENTER THE GENERIC NAME OF THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS NAME WILL APPEAR ON THE PERMIT, WHICH MAY BE ISSUED PURSUANT TO THIS APPLICATION. THIS FORM MUST BE ACCOMPANIED BY OTHER APPLICABLE FORMS AND INFORMATION.

(C) PROVIDE A DESIGNATION IN ITEM 7 ABOVE WHICH YOU WOULD LIKE THE AGENCY TO USE FOR IDENTIFICATION OF YOUR EQUIPMENT. YOUR DESIGNATION WILL BE REFERENCED IN CORRESPONDENCE FROM THIS AGENCY RELATIVE TO THIS APPLICATION. YOUR DESIGNATION MUST NOT EXCEED TEN (10) CHARACTERS.

(D) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH 35 ILL. ADM. CODE 201.154 OR 201.159 WHICH STATES: "ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

IF THE OWNER OR OPERATOR IS A CORPORATION, SUCH CORPORATION MUST HAVE ON FILE WITH THE AGENCY A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONSTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.

9. DOES THIS APPLICATION CONTAIN A PLOT PLAN/MAP:
☐ YES ☒ NO

IF A PLOT PLAN/MAP HAS PREVIOUSLY BEEN SUBMITTED, SPECIFY:
AGENCY I.D. NUMBER *031600FWL* APPLICATION NUMBER *96020074*

IS THE APPROXIMATE SIZE OF APPLICANT'S PREMISES LESS THAN 1 ACRE?
☒ YES ☐ NO: SPECIFY ACRES *43*

10. DOES THIS APPLICATION CONTAIN A PROCESS FLOW DIAGRAM(S) THAT ACCURATELY AND CLEARLY REPRESENTS CURRENT PRACTICE.
☒ YES ☐ NO

11a. WAS ANY EQUIPMENT, COVERED BY THIS APPLICATION, OWNED OR CONTRACTED FOR, BY THE APPLICANT PRIOR TO APRIL 14, 1972:
☐ YES ☒ NO

IF "YES," ATTACH AN ADDITIONAL SHEET, EXHIBIT A, THAT:

(a) LISTS OR DESCRIBES THE EQUIPMENT

(b) STATES WHETHER THE EQUIPMENT WAS IN COMPLIANCE WITH THE RULES AND REGULATIONS GOVERNING THE CONTROL OF AIR POLLUTION PRIOR TO APRIL 4, 1972

11b. HAS ANY EQUIPMENT, COVERED BY THIS APPLICATION, NOT PREVIOUSLY RECEIVED AN OPERATING PERMIT:
☐ YES ☒ NO

IF "YES," ATTACH AN ADDITIONAL SHEET, EXHIBIT B, THAT:

(a) LISTS OR DESCRIBES THE EQUIPMENT

(b) STATES WHETHER THE EQUIPMENT

(i) IS ORIGINAL OR ADDITIONAL EQUIPMENT
(ii) REPLACES EXISTING EQUIPMENT, OR
(iii) MODIFIES EXISTING EQUIPMENT

(c) PROVIDES THE ANTICIPATED OR ACTUAL DATES OF THE COMMENCEMENT OF CONSTRUCTION AND THE START-UP OF THE EQUIPMENT

12. IF THIS APPLICATION INCORPORATES BY REFERENCE A PREVIOUSLY GRANTED PERMIT(S), HAS FORM APC-210, "DATA AND INFORMATION--INCORPORATION BY REFERENCE" BEEN COMPLETED.
☐ YES ☒ NO

13. DOES THE STARTUP OF AN EMISSION SOURCE COVERED BY THIS APPLICATION PRODUCE AIR CONTAMINANT EMISSION IN EXCESS OF APPLICABLE STANDARDS:
☐ YES ☒ NO

IF "YES," HAS FORM APC-203, "OPERATION DURING STARTUP" BEEN COMPLETED FOR THIS SOURCE
☐ YES ☐ NO

14. DOES THIS APPLICATION REQUEST PERMISSION TO OPERATE AN EMISSION SOURCE DURING MALFUNCTION OR BREAKDOWNS:
☐ YES ☒ NO

IF "YES," HAS FORM APC-204, "OPERATION DURING MALFUNCTION AND BREAKDOWN" BEEN COMPLETED FOR THIS SOURCE
☐ YES ☐ NO

15. IS AN EMISSION SOURCE COVERED BY THIS APPLICATION SUBJECT TO A FUTURE COMPLIANCE DATE:
☐ YES ☒ NO

IF "YES," HAS FORM APC-202, "COMPLIANCE PROGRAM & PROJECT COMPLETION SCHEDULE," BEEN COMPLETED FOR THIS SOURCE:
☐ YES ☐ NO

16. DOES THE FACILITY COVERED BY THIS APPLICATION REQUIRE AN EPISODE ACTION PLAN (REFER TO GUIDELINES FOR EPISODE ACTION PLANS):
☐ YES ☒ NO

17. LIST AND IDENTIFY ALL FORMS, EXHIBITS, AND OTHER INFORMATION SUBMITTED AS PART OF THIS APPLICATION. INCLUDE THE PAGE NUMBERS OF EACH ITEM (ATTACH ADDITIONAL SHEETS IF NECESSARY):

See Table of Contents

TOTAL NUMBER OF PAGES

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

DATA AND INFORMATION INCORPORATION BY REFERENCE	FOR AGENCY USE ONLY

THIS FORM IS TO BE USED TO INCORPORATE OR TRANSFER INFORMATION FROM ONE PERMIT APPLICATION TO ANOTHER, INCLUDING THE TRANSFER OF INFORMATION FROM A CONSTRUCTION PERMIT APPLICATION INTO AN OPERATING PERMIT APPLICATION. THIS FORM SHOULD ACCOMPANY THE APPLICATION INTO WHICH INFORMATION IS BEING TRANSFERRED.

1. NAME OF OWNER:	2. NAME OF CORPORATE DIV. OR PLANT (IF DIFFERENT FROM OWNER):
National Materials L. P.	*NACME Steel Processing, LLC*

3. STREET ADDRESS OF EMISSION SOURCE:	4. CITY OF EMISSION SOURCE:	5. IDENTIFICATION NUMBER:
429 West 127th Street	*Chicago*	*031600FWL*

6. APPLICATION NUMBER:	7. ☐ CONSTRUCTION ☒ OPERATION OF
96020074	*Steel Pickling Line*

8. SHOULD ALL INFORMATION IN THIS APPLICATION BE INCORPORATED BY REFERENCE OR TRANSFERRED?
☒ YES ☐ NO
IF "NO", LIST ITEMS TO BE INCORPORATED:

9a. ITEM TO BE INCORPORATED:	b. PAGE	c. FLOW DIAGRAM DESIGNATION (IF APPLICABLE):

10. DOES THE DATA & INFORMATION DESCRIBING THESE ITEMS REMAIN TRUE, CORRECT, CURRENT AND COMPLETE?
☐ YES ☒ NO
IF "NO", SUBMIT THE APPLICABLE FORMS AND CLEARLY STATE THE DATA AND INFORMATION WHICH IS NO LONGER TRUE, CORRECT, CURRENT AND COMPLETE.

11. APPLICATION NUMBER:	12. ☐ CONSTRUCTION ☐ OPERATION OF

13. SHOULD ALL INFORMATION IN THIS APPLICATION BE INCORPORATED BY REFERENCE OR TRANSFERRED?
☐ YES ☐ NO
IF "NO", LIST ITEMS TO BE INCORPORATED:

14a. ITEM TO BE INCORPORATED:	b. PAGE	c. FLOW DIAGRAM DESIGNATION (IF APPLICABLE):

15. DOES THE DATA & INFORMATION DESCRIBING THESE ITEMS REMAIN TRUE, CORRECT, CURRENT AND COMPLETE?
☐ YES ☐ NO
IF "NO", SUBMIT THE APPLICABLE FORMS AND CLEARLY STATE THE DATA AND INFORMATION WHICH IS NO LONGER TRUE, CORRECT, CURRENT AND COMPLETE.

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

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

*DATA AND INFORMATION PROCESS EMISSION SOURCE	

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

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

GENERAL INFORMATION		
5. NAME OF PROCESS: *HCL Steel Pickling*	6. NAME OF EMISSION SOURCE EQUIPMENT: *Enclosed Steel Pickling Line*	
7. EMISSION SOURCE EQUIPMENT MANUFACTURER: *PRO-ECO*	8. MODEL NUMBER:	9. SERIAL NUMBER:
10. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE: *SPL 1*		
11. IDENTITY(S) OF ANY SIMILAR SOURCE(S) AT THE PLANT OR PREMISES NOT COVERED BY THE FORM (IF THE SOURCE IS COVERED BY ANOTHER APPLICATION, IDENTIFY THE APPLICATION): *N/A*		
12. AVERAGE OPERATING TIME OF EMISSION SOURCE: *24* HRS/DAY *7* DAYS/WK *52* WKS/YR	13. MAXIMUM OPERATING TIME OF EMISSION SOURCE: *24* HRS/DAY *7* DAYS/WK *52* WKS/YR	
14. PERCENT OF ANNUAL THROUGHPUT: DEC-FEB *25%* MAR-MAY *25%* JUN-AUG *25%* SEPT-NOV *25%*		

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

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

090-008

RAW MATERIAL INFORMATION							
	NAME OF RAW MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE			MAXIMUM RATE PER IDENTICAL SOURCE		
20a.	*Steel Coils*	b.	*171,233*	LB/HR	c.	*171,233*	LB/HR
21a.	*HCL Solution*	b.	*2,200*	LB/HR	c.	*2,200*	LB/HR
22a.	*Water*	b.	*34,000*	LB/HR	c.	*34,000*	LB/HR
23a.		b.		LB/HR	c.		LB/HR
24a.		b.		LB/HR	c.		LB/HR

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

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

*FUEL USAGE INFORMATION -- *Not Applicable*				
	FUEL USED		TYPE	HEAT CONTENT
50a.	NATURAL GAS ☐	b.		c. BTU/SCF
	OTHER GAS ☐			BTU/SCF
	OIL ☐			BTU/GAL
	COAL ☐			BTU/LB
	OTHER ☐			BTU/LB
d. AVERAGE FIRING RATE PER IDENTICAL SOURCE: BTU/HR			e. MAXIMUM FIRING RATE PER IDENTICAL SOURCE: BTU/HR	

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

*EMISSION INFORMATION				
51. NUMBER OF IDENTICAL SOURCES (DESCRIBE AS REQUIRED):				
AVERAGE OPERATION				
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE			METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	52a. GR/SCF	b. LB/HR		c.
CARBON MONOXIDE	53a. PPM (VOL)	b. LB/HR		c.
NITROGEN OXIDES	54a. PPM (VOL)	b. LB/HR		c.
ORGANIC MATERIAL	55a. PPM (VOL)	b. LB/HR		c.
SULFUR DIOXIDE	56a. PPM (VOL)	b. LB/HR		c.
**OTHER (SPECIFY)	57a. PPM (VOL)	b. LB/HR		c. *See APC 260*
MAXIMUM OPERATION				
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE			METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	58a. GR/SCF	b. LB/HR		c.
CARBON MONOXIDE	59a. PPM (VOL)	b. LB/HR		c.
NITROGEN OXIDES	60a. PPM (VOL)	b. LB/HR		c.
ORGANIC MATERIAL	61a. PPM (VOL)	b. LB/HR		c.
SULFUR DIOXIDE	62a. PPM (VOL)	b. LB/HR		c.
**OTHER (SPECIFY)	63a. PPM (VOL)	b. LB/HR		c. *See APC 260*

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

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

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

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

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

*DATA AND INFORMATION AIR POLLUTION CONTROL EQUIPMENT	

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

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

INSTRUCTIONS

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

DEFINITIONS

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

ADSORPTION UNIT - *Not Applicable*	
1. FLOW DIAGRAM DESIGNATION(S) OF ADSORPTION UNIT:	
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
4. ADSORBENT: ☐ ACTIVATED CHARCOAL:TYPE	☐ OTHER: SPECIFY:
5. ADSORBATE(S):	
6. NUMBER OF BEDS PER UNIT:	7. WEIGHT OF ADSORBENT PER BED: LB
8. DIMENSION OF BED: THICKNESS_____ IN, SURFACE AREA _____ SQUARE IN	
9. INLET GAS TEMPERATURE °F	10. PRESSURE DROP ACROSS UNIT: INCH H_2O GAUGE
11. TYPE OF REGENERATION: ☐ REPLACEMENT ☐ STEAM ☐ OTHER:SPECIFY: _____	
12. METHOD OF REGENERATION: ☐ ALTERNATE USE OF _____ ENTIRE UNITS ☐ SOURCE SHUT DOWN ☐ OTHER:DESCRIBE	☐ ALTERNATE USE OF _____ BEDS IN A SINGLE UNIT
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
13. TIME ON LINE BEFORE REGENERATION: MIN/BED	15. TIME ON LINE BEFORE REGENERATION: MIN/BED
14. EFFICIENCY OF ABSORBER (SEE INSTRUCTION 4): %	16. EFFICIENCY OF ABSORBER (SEE INSTRUCTION 4): %

AFTERBURNER - *Not Applicable*	
1. FLOW DIAGRAM DESIGNATION(S) OF AFTERBURNER:	
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
4. COMBUSTION CHAMBER DIMENSIONS: LENGTH _____ IN, CROSS-SECTIONAL AREA _____ SQUARE IN	
5. INLET GAS TEMPERATURE: °F	7. FUEL ☐ GAS ☐ OIL: SULFUR _____ WT%
6. OPERATING TEMPERATURE OF COMBUSTION CHAMBER: °F	8. BURNERS PER AFTERBURNER: _____ @ _____ BTU/HR EACH
9. CATALYST USED: ☐ NO ☐ YES: DESCRIBE CATALYST _____	
10. HEAT EXCHANGER USED: ☐ NO ☐ YES: DESCRIBE HEAT EXCHANGER _____	
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
11. GAS FLOW RATE: SCFM	13. GAS FLOW RATE: SCFM
12. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): %	14. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): %

CYCLONE - ***Not Applicable***	
1. FLOW DIAGRAM DESIGNATION(S) OF CYCLONE:	
2. MANUFACTURER:	3. MODEL:
4. TYPE OF CYCLONE: ☐ SIMPLE ☐ MULTIPLE	5. NUMBER OF CYCLONES IN EACH MULTIPLE CYCLONE:
6. DIMENSION THE APPROPRIATE SKETCH (IN INCHES) OR PROVIDE A DRAWING WITH EQUIVALENT INFORMATION:	
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
7. GAS FLOW RATE: SCFM	9. GAS FLOW RATE: SCFM
8. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4): %	10. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4): %

CONDENSER - *Not Applicable*		
1. FLOW DIAGRAM DESIGNATION(S) OF CONDENSER:		
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:	4. HEAT EXCHANGE AREA: FT²
AVERAGE OPERATION OF SOURCE		**MAXIMUM OPERATION OF SOURCE**
5. COOLANT FLOW RATE PER CONDENSER: WATER _____ GPMAIR _____ SCFM OTHER: TYPE _____, FLOW RATE _____		10. COOLANT FLOW RATE PER CONDENSER: WATER _____ GPMAIR _____ SCFM OTHER: TYPE _____, FLOW RATE _____
6. GAS FLOW RATE: SCFM		11. GAS FLOW RATE: SCFM
7. COOLANT TEMPERATURE: INLET _____ °F, OUTLET _____ °F	8. GAS TEMPERATURE: INLET _____ °F, OUTLET _____ °F	12. COOLANT TEMPERATURE: INLET _____ °F, OUTLET _____ °F
9. EFFICIENCY OF CONDENSER (SEE INSTRUCTION 4): %		13. GAS TEMPERATURE: INLET _____ °F, OUTLET _____ °F 14. EFFICIENCY OF CONDENSER (SEE INSTRUCTION 4): %

*ELECTRICAL PRECIPITATOR - *Not Applicable*	
1. FLOW DIAGRAM DESIGNATION OF ELECTRICAL PRECIPITATOR:	
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
4. COLLECTING ELECTRODE AREA PER CONTROL DEVICE: FT²	
AVERAGE OPERATION OF SOURCE	**MAXIMUM OPERATION OF SOURCE**
5. GAS FLOW RATE: SCFM	7. GAS FLOW RATE: SCFM
6. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4): %	8. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4): %
SUBMIT THE MANUFACTURER'S SPECIFICATIONS FOR THE ELECTRICAL PRECIPITATOR. REFERENCE THE INFORMATION TO THIS FORM.	

* ELECTRICAL PRECIPITATORS VARY GREATLY IN THEIR DESIGN AND IN THEIR COMPLEXITY. THE ITEMS IN THIS SECTION PROVIDE A MINIMUM AMOUNT OF INFORMATION. THE APPLICANT MUST, HOWEVER, SUBMIT WITH THIS APPLICATION THE MANUFACTURER'S SPECIFICATIONS, INCLUDING ANY DRAWINGS, TECHNICAL DOCUMENTS, ETC. IF THE INFORMATION PROVIDED BY THE MANUFACTURER'S SPECIFICATIONS IS INSUFFICIENT FOR FULL AND ACCURATE ANALYSIS, THE AGENCY WILL REQUEST SPECIFIC ADDITIONAL INFORMATION.

FILTER UNIT - *Not Applicable*	
1. FLOW DIAGRAM DESIGNATION(S) OF FILTER UNIT:	
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
4. FILTERING MATERIAL:	5. FILTERING AREA:
6. CLEANING METHOD: ☐ SHAKER ☐ REVERSE AIR ☐ PULSE AIR ☐ PULSE JET ☐ OTHER: SPECIFY	
7. GAS COOLING METHOD: o DUCTWORK: LENGTH _____ FT., DIAM _____ IN. ☐ BLEED-IN AIR ☐ WATER SPRAY ☐ OTHER: SPECIFY	
AVERAGE OPERATION OF SOURCE	**MAXIMUM OPERATION OF SOURCE**
8. GAS FLOW RATE (FROM SOURCE): SCFM	12. GAS FLOW RATE (FROM SOURCE): SCFM
9. GAS COOLING FLOW RATE: ☐ BLEED-IN AIR _____ SCFM, WATER SPRAY _____ GPM	13. GAS COOLING FLOW RATE: ☐ BLEED-IN AIR _____ SCFM, WATER SPRAY _____ GPM
10. INLET GAS CONDITION: TEMPERATURE _____ °F, DEWPOINT _____ °F	14. INLET GAS CONDITION: TEMPERATURE _____ °F, DEWPOINT _____ °F
11. EFFICIENCY OF FILTER UNIT (SEE INSTRUCTION 4) %	15. EFFICIENCY OF FILTER UNIT (SEE INSTRUCTION 4): %

SCRUBBER

1. FLOW DIAGRAM DESIGNATION(S) OF SCRUBBER: *Pickling Line Wet Scrubber*

2. MANUFACTURER: *PRO-ECO*

3. MODEL NAME AND NUMBER:

4. TYPE OF SCRUBBER:
- ☐ HIGH ENERGY: GAS STREAM PRESSURE DROP _____ INCH H_2O
- ☐ PACKED: PACKING TYPE _____, PACKING SIZE _____, PACKED HEIGHT _____ IN.
- ☐ SPRAY: NUMBER OF NOZZLES _____, NOZZLE PRESSURE _____ PSIG
- ☒ OTHER: SPECIFY – *4 Sieve Tray* - ATTACH DESCRIPTION AND SKETCH WITH DIMENSIONS

5. TYPE OF FLOW:
☒ CONCURRENT ☐ COUNTERCURRENT ☐ CROSSFLOW

6. SCRUBBER GEOMETRY:
LENGTH IN DIRECTION OF GAS FLOW *192* IN., CROSS-SECTIONAL AREA *13.824* SQUARE IN.

7. CHEMICAL COMPOSITION OF SCRUBBANT: *Heavy Duty FRP*

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
8. SCRUBBANT FLOW RATE: *1.5* GPM	12. SCRUBBANT FLOW RATE: *2* GPM
9. GAS FLOW RATE: *4,975* SCFM	13. GAS FLOW RATE: *5,061* SCFM
10. INLET GAS TEMPERATURE: *123* °F	14. INLET GAS TEMPERATURE: *125* °F
11. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4): *99.90 %* PARTICULATE *99.90 %* GASEOUS	15. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4): *99.90 %* PARTICULATE *99.90 %* GASEOUS

OTHER TYPE OF CONTROL EQUIPMENT - *Not Applicable*

1. FLOW DIAGRAM DESIGNATION(S) OF "OTHER TYPE" OF CONTROL EQUIPMENT:

2. GENERIC NAME OF "OTHER" EQUIPMENT:	3. MANUFACTURER:	4. MODEL NAME AND NUMBER:

5. DESCRIPTION AND SKETCH, WITH DIMENSIONS AND FLOW RATES, OF "OTHER" EQUIPMENT:

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
6. FLOW RATES: _____ GPM _____ SCFM	8. FLOW RATES: _____ GPM _____ SCFM
7. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): %	9. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): %

EMISSION INFORMATION

51. NUMBER OF IDENTICAL CONTROL UNITS OR CONTROL SYSTEMS (DESCRIBE AS REQUIRED):

AVERAGE OPERATION OF SOURCE

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	2a. GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	3a. PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	4a. PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	5a. PPM (VOL)	b. LB/HR	c.
SULFUR DIOXIDE	6a. PPM (VOL)	b. LB/HR	c.
OTHER (SPECIFY) HCL	7a. PPM (VOL)	b. *0.41* LB/HR	c. *Emission Factor/Flow Measurements*

MAXIMUM OPERATION OF SOURCE

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	8a. GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	9a. PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	10a. PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	11a. PPM (VOL)	b. LB/HR	c.
SULFUR DIOXIDE	12a. PPM (VOL)	b. LB/HR	c.
OTHER (SPECIFY) HCL	13a. PPM (VOL)	b. *0.41* LB/HR	c. *Emission Factor/Flow Measurements*

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

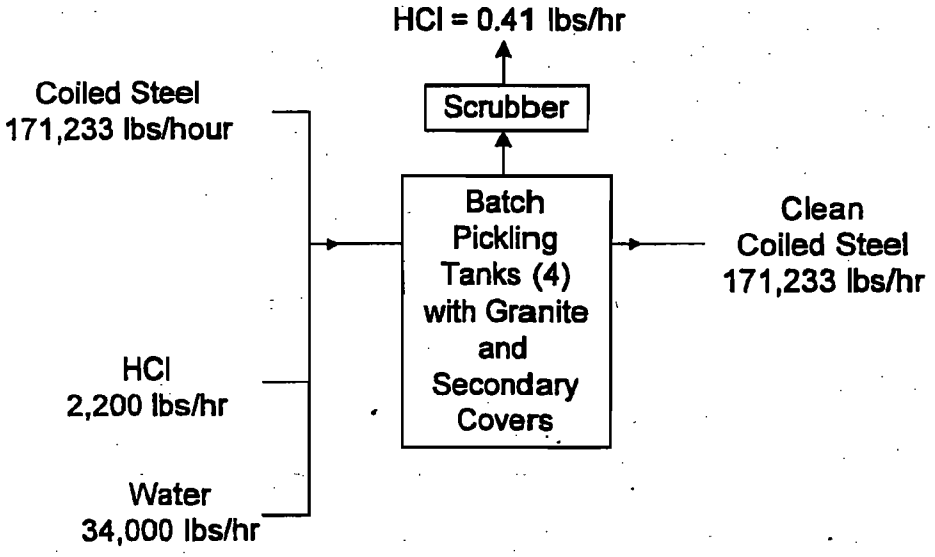
EXHAUST POINT INFORMATION

1. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT:
Pickle Line Scrubber

2. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.):
Vertical Stack

3. EXIT HEIGHT ABOVE GRADE: *70* FT	4. EXIT DIAMETER: *1.25*
5. GREATEST HEIGHT OF NEARBY BUILDINGS: *42* FT	6. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: *250* FT
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
7. EXIT GAS TEMPERATURE: *123* °F	9. EXIT GAS TEMPERATURE *125* °F
8. GAS FLOW RATE THROUGH EACH EXIT: *6,446* ACFM	10. GAS FLOW RATE THROUGH EACH EXIT: *6,526* ACFM

HCL PICKLING PROCESS AT MAXIMUM OPERATION
FLOW DIAGRAM - SPL1



NACME STEEL PROCESSING
429 WEST 127TH STREET
CHICAGO, ILLINOIS

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

Maximum Operation Rate

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

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

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

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

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

ENCLOSURE A – TURBOTUNNEL MANUFACTURER'S DOCUMENTATION

B/H Waste
by facsimile

Nelson Stee
199 Arvin Avenue
Stoney Creek, Ontario
Canada L8E 2L9

March 15, 2001

Fax #: 847-806-4721

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

ATTENTION: MR. LANNY READ

Dear Lanny:

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

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

TYPICAL OPERATING CONDITIONS

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

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

cont'd.../2

Nelson Steel

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

	Without double covers (5-tray scrubber)	*With double covers (4-tray scrubber)*
Scrubber inlet concentration (PPM)	2421	544
Scrubber outlet concentration (PPM)	18	3

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

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

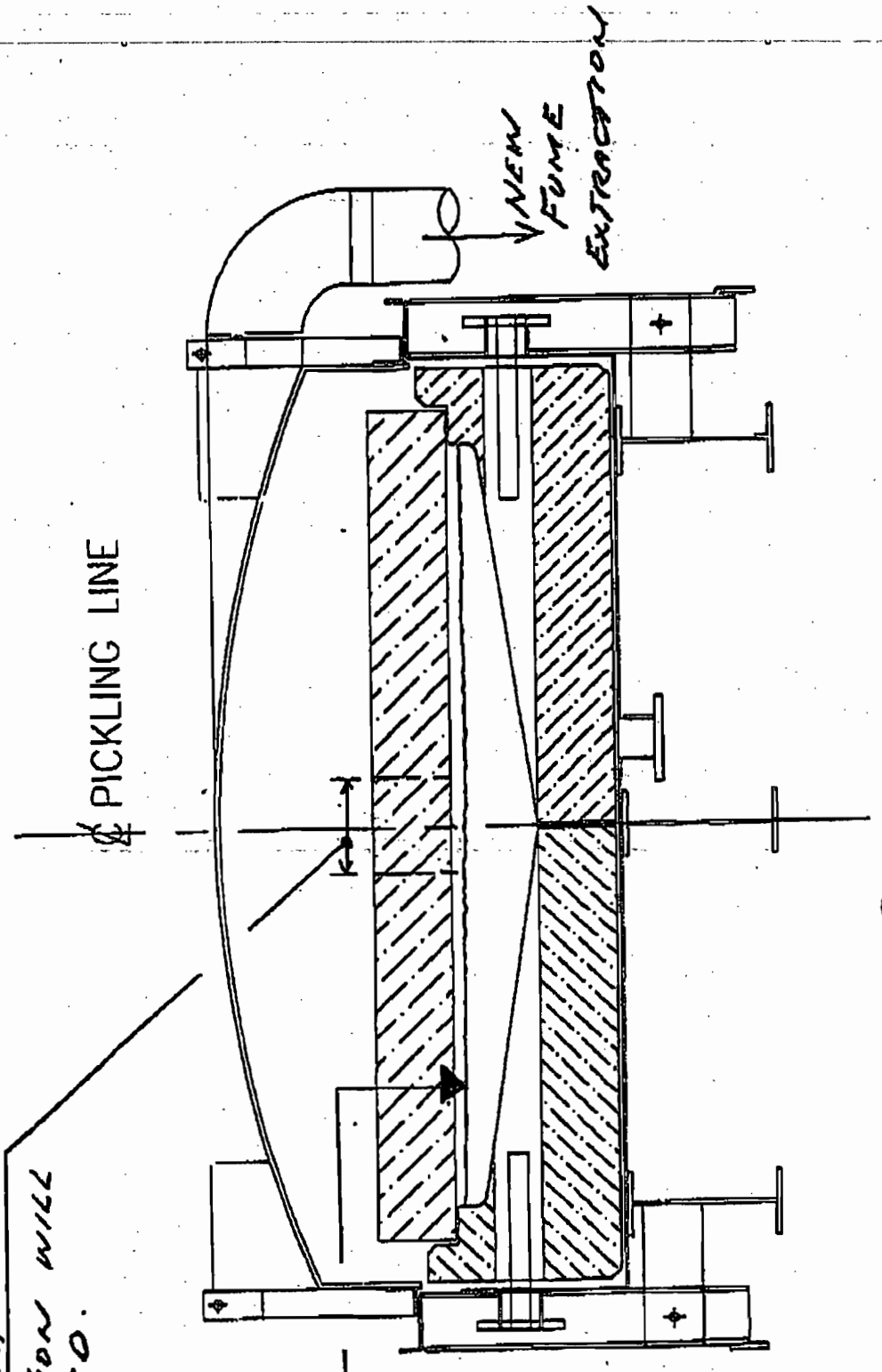
Best regards,

Graham Oakley
General Manager, Technology Group

:dnr

enc.

cc: John Mercer



SECTION (TYPICAL ONLY)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

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

217/782-2113

CONSTRUCTION PERMIT -- REVISED

PERMITTEE

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

Application No.: 01040081 I.D. No.: 031600FWL
Applicant's Designation: PICKLING Date Received: April 11, 2002
Subject: Turbo-tunnel Enclosure
Date Issued: April 12, 2002
Location: 429 West 127th Street, Chicago, 60628

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

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

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

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

2. This permit allows operation of the pickling line at the rates and operational parameters specified in the Condition 1 only for the purpose of stack testing required by Special Condition 3.

3a. Within 30 days of issuance of this permit the emission of Hydrogen Chloride (HCl) shall be measured by an approved testing service, during conditions representing the maximum HCl emission. This condition supersedes Standard Condition 6b.

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

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
Hydrogen Chloride (HCl)	USEPA Method 26

c. At least 30 days prior to the actual date of testing a written test plan shall be submitted to the Illinois EPA for review and approval. This plan shall describe the specific procedures for testing, including:

i. The person(s) who will be performing sampling and analysis and their experience with similar tests.

ii. The conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum operating rate, the levels of operating parameters at or within which compliance is intended to be shown, if applicable, and the means by which the operating parameters for the process and any control equipment will be determined.

d. The Illinois EPA shall be notified prior to this test to enable the Illinois EPA to observe these tests. Notification for the expected date of testing shall be submitted a minimum of thirty (30) days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of five (5) working days prior to the actual date of the tests. The Illinois EPA may, at its discretion, accept notification with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe the testing.

4. The Final Report(s) for all tests shall be submitted within 30 days after the date of the test. The Final Report shall include as a minimum:

a. General information describing the test, including the name and identification of the emission source which was tested, date of test, names of personnel performing the tests, and Illinois EPA observers, if any;

b. A summary of results;

c. Description of test procedures, including description of sampling points, test equipment, and test schedule;

d. Detailed description of test conditions, including:

i. Process information, i.e., process rate, raw materials type, fuel type, etc.

ii. Control equipment information, i.e., equipment condition and operating parameters during testing.

e. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.

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

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

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

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

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

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

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

DES:VJB:psj

cc: Region 1

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

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

GE Energy Services

GASEOUS EMISSIONS TEST

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

At The
HCl Scrubber Exhaust Stack
Chicago, Illinois

April 16, 2002

GE Energy Services
Air Quality Systems & Services

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

GASEOUS EMISSIONS TEST

Performed For

NACME STEEL PROCESSING, L.L.C.

At The

HCl Scrubber Exhaust Stack

Chicago, Illinois

April 16, 2002

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

TABLE OF CONTENTS

CERTIFICATION SHEET

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

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

GE MOSTARDI PLATT

James F. Robertson
Project Manager

Reviewed by:

Jeffrey M. Crivlare
Senior Project Manager

GE Energy Services
Air Quality Systems & Services

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

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

1.0 INTRODUCTION

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

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

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

2.0 SUMMARY OF RESULTS

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

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

3.0 DISCUSSION OF RESULTS

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

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

4.0 TEST PROCEDURES

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

4.1 Volumetric Flowrate Determination

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

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

4.2 Oxygen (O_2)/Carbon Dioxide (CO_2) Determination

Oxygen (O_2) and carbon dioxide (CO_2) gas contents were determined in accordance with Method 3, 40CFR60. This method analyzed samples collected in a grab manner using a Hays Orsat gas analyzer. Several gas extractions were performed during each test run to ensure a stable reading. Mandatory leak checks were performed prior to and following each use. Chemicals are changed frequently and inspected for reactivity prior to each use.

4.3 Hydrogen Chloride (HCl) Determination (Isokinetic Sampling)

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

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

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

5.0 QUALITY ASSURANCE PROCEDURES

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

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

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

6.0 TEST RESULTS SUMMARY

HCl TEST RESULTS SUMMARY				
Plant: NACME Steel Processing		Source: HCL Scrubber Exhaust		
Test Run Number	1	2	3	Average
Test Location	Stack			
Source Condition	Normal			
Date	4/16/02			
Time	0845-0955	1040-1147	1225-1330	
HCl Concentration, ppm	7.05	7.37	6.20	6.87
HCl Emission Rate, lbs/hr	0.229	0.229	0.192	0.217
Average Gas Volumetric Flow Rate:				
@ Flue Conditions, acfm	7,202	6,968	7,022	7,064
@ Standard Conditions, dscfm	5,704	5,466	5,450	5,540
Average Gas Temperature, °F	126.17	125.58	125.50	125.75
Average Gas Velocity, ft/sec	16.982	16.430	16.558	16.657
Flue Gas Moisture, percent by volume	10.4	11.3	12.3	11.3
Average Flue Pressure, in. Hg	29.35	29.35	29.35	
Barometric Pressure, in. Hg	29.31	29.31	29.31	
Average % CO_2 by volume, dry basis	0.0	0.0	0.0	0.0
Average % O_2 by volume, dry basis	20.5	20.9	20.9	20.8
Dry Molecular Wt. of Gas, lb/lb-mole	28.820	28.836	28.836	
Gas Sample Volume, dscf	37.633	36.645	36.653	

APPENDIX

OPERATING DATA DURING EMMISIONS TEST 4-16-02

	Temp	% Acid	Scrubber Water	Stack MSA Monitor
8AM	#1 195° #2 185° #3 195° #4 195°	11.5%	2.57 GPM	7 PPM
9AM	#1 195° #2 185° #3 195° #4 195°	11.6%	2.67 GPM	12 PPM
10AM	#1 195° #2 185° #3 195° #4 195°	11.6%	2.69 GPM	8 PPM
11AM	#1 195° #2 185° #3 195° #4 196°	11.4%	2.58 GPM	9 PPM
12:00	#1 195° #2 185° #3 195° #4 195°	11.4	2.56 GPM	8 PPM
1:00 PM	#1 195° #2 185° #3 195° #4 195°	11.4	2.57 GPM	8 PPM

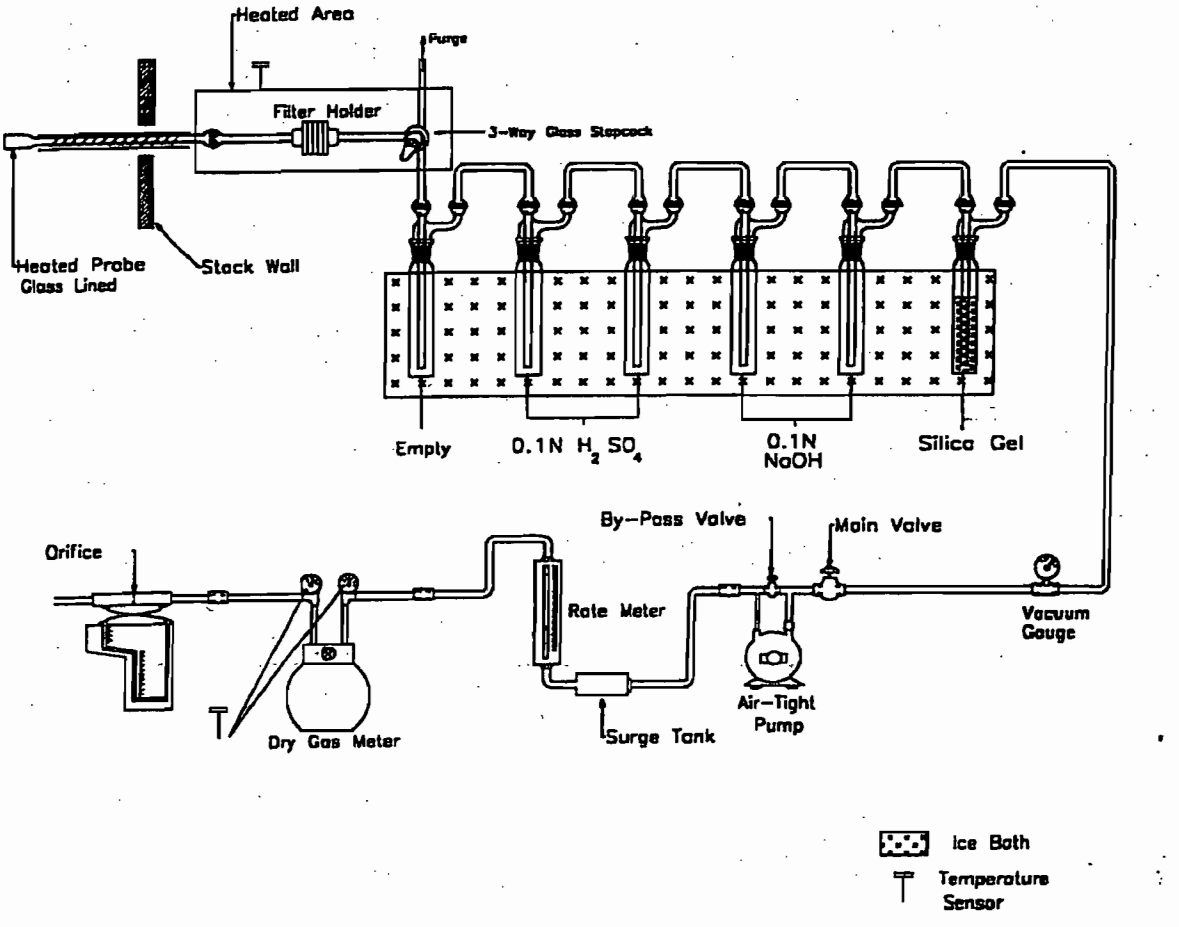
Pickled 200 Tons

4/16/02

GE Energy Services

Determination of HCl and HF Concentrations in Stack Gases

USEPA Method 26 Sample Train



Dwg - R

LABORATORY REPORT

TEI Analytical, Inc.
7177 N. Austin
Niles, IL 60714-4617
847-647-1345

PREPARED FOR:

Frank Jarke
GE Mostardi Platt
888 Industrial Dr.
Elmhurst, IL 60126

Report #: 56031
Report Date: 4/29/2002
Sample Received:
4/17/02 13:33

20020303-01

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

Gayle E. O'Neill, Ph.D.

CALCULATIONS FOR HCl
METHOD 26

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

Where: Total

M = Mass of HCl in sample, lbs

S = Concentration of sample, micrograms HCl

B = Blank concentration micrograms HCl

4.53592×10^8 = Micrograms per Pound

C = M/Vmstd

Where:

C = Concentration of HCl in flue gas lbs/dscf
M = Mass of HCl in Sample, lbs.
Vmstd = Sample volume measured by dry gas meter, corrected to standard conditions .

E = C × dscfm × 60 min/hr

Where:

E = Emission rate HCl in lbs/hr

C = Concentration of HCl in lbs/DSCF

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

METHOD 26 TEST RESULTS

Date:	4/16/02	Condition:	Normal
Project:	Nacme	Data Taken By:	A. Robinson
Location:	HCl Scrubber		
Source:	Stack		

Test Number:	1	Time:	0845-0955
Pressure, Barometric(Hg"):	29.310	Carbon Dioxide Content(%):	0.00
Pressure, Static(H_2O"):	0.50	Oxygen Content(%):	20.50
Pressure, Stack(Hg"):	29.347	Nitrogen Content(%):	79.50
Initial Volume (cu.ft.)	25.082	Cl_2 (mg)	0.000
Final Volume (cu.ft.)	63.88	HCl (mg)	11.400
Meter Temperature (°F)	81.04	Water Vapor in Flue Gas (Bws):	0.070
Meter Volume (dscf)	37.6324	Cl_2 (ppm):	0.00
Meter Calibration (Y)	1.011	HCl (ppm):	7.05
Initial Wt. (grms or mls)	665.5	Cl_2 (lbs/hr):	0.000
Final Wt. (grms or mls)	757.9	HCl (lbs/hr):	0.229
Average Delta H (ΔH)	1.420		
Dry Standard Flow Rate (dscfm):	5704.0		

Test Number:	2	Time:	1040-1147
Pressure, Barometric(Hg"):	29.310	Carbon Dioxide Content(%):	0.00
Pressure, Static(H_2O"):	0.50	Oxygen Content(%):	20.90
Pressure, Stack(Hg"):	29.347	Nitrogen Content(%):	79.10
Initial Volume (cu.ft.)	64.36	Cl_2 (mg)	0.000
Final Volume (cu.ft.)	102.46	HCl (mg)	11.600
Meter Temperature (°F)	85.60	Water Vapor in Flue Gas (Bws):	0.113
Meter Volume (dscf)	36.6410	Cl_2 (ppm):	0.00
Meter Calibration (Y)	1.011	HCl (ppm):	7.37
Initial Wt. (grms or mls)	650.8	Cl_2 (lbs/hr):	0.000
Final Wt. (grms or mls)	748.9	HCl (lbs/hr):	0.229
Average Delta H (ΔH)	1.360		
Dry Standard Flow Rate (dscfm):	5466.0		

Test Number:	3	Time:	1225-1330
Pressure, Barometric(Hg"):	29.310	Carbon Dioxide Content(%):	0.00
Pressure, Static(H_2O"):	0.50	Oxygen Content(%):	20.90
Pressure, Stack(Hg"):	29.347	Nitrogen Content(%):	79.10
Initial Volume (cu.ft.)	2.897	Cl_2 (mg)	0.000
Final Volume (cu.ft.)	41.257	HCl (mg)	9.760
Meter Temperature (°F)	89.17	Water Vapor in Flue Gas (Bws):	0.123
Meter Volume (dscf)	36.6531	Cl_2 (ppm):	0.00
Meter Calibration (Y)	1.011	HCl (ppm):	6.20
Initial Wt. (grms or mls)	653.5	Cl_2 (lbs/hr):	0.000
Final Wt. (grms or mls)	762.2	HCl (lbs/hr):	0.192
Average Delta H (ΔH)	1.380		
Dry Standard Flow Rate (dscfm):	5450.0		

PARTICULATE TRAVERSE DATA

Company: Nacme **Date:** 4/16/02 **Test Run.:** 1 M26A

Location: HCl Scrubber Stack

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

METHOD 5 DATA ENTRY FORM

Field Data/Calculated Data

Company:	Nacme
Date:	4/16/02
Test Run:	1 M26A
Stack or Duct No.:	HCl Scrubber Stack
Start Time:	8:45
Stop Time:	9:55

Pb:	29.31	inches Hg
Static	0.50	inches H2O
Ps:	29.35	inches Hg Abs.
Vlc:	92	ml + grams
Mn:	0.0000	gm
Test Time:	60	minutes
% O2:	20.50	%
% CO2:	0.00	%
% N2:	79.50	%
Delta H:	1.42	inches H20
Cp:	0.836	Dimensionless - pitot
Tm:	81.04	°F
Sqrt P:	0.280	inches H20
Ts:	126.17	°F
Vm:	38.799	Cubic Feet
Dn:	0.372	inches - nozzle
As:	7.07	Sq. Feet
Yd:	1.011	Mcf
CF:	N/A	Process tons/hr
Heat Input:	N/A	MM BTU/hr
Fd:	N/A	dscf/10^6 Btu
Fc:	N/A	scf/10^6 Btu

Vmstd:	37.633	cubic feet (dry)
Vwstd:	4.352	cubic feet (wet)
Bwo:	0.104	
Md:	28.820	lb/lb-mole (dry)
Ms:	27.698	lb/lb-mole (wet)
Excess Air (%)	4200.820	
Vs:	16.982	fps
ACFM:	7202.	
DSCFM:	5704.	
WSCFM:	6363	
%I:	103.0	isokinetic variance
GR/ACF:	0.0000	
GR/DSCF:	0.0000	
lbs/hr	0.000	
lbs/ton prod.:	N/A	
lbs/MM BTU:	N/A	Heat Input
lbs/MM BTU:	N/A	O2 Basis
lbs/MM BTU:	N/A	CO2 Basis

PARTICULATE TRAVERSE DATA

Company: Nacme **Date:** 4/16/02 **Test Run.:** 2 M26A

Location: HCl Scrubber Stack

Point	Δp	Sq. Root Δp	Time	Volume cubic feet	ΔH	Stack Temp °F	Meter Inlet °F	Meter Outlet °F	Vacuum In. Hg	
1-1	0.09	0.300	10:40:00	64.36	1.60	123	85	85	3	1.780
1-2	0.09	0.300	10:42:50	66.14	1.60	123	85	85	3	1.720
1-3	0.10	0.316	10:45:00	67.86	1.80	122	85	85	3	1.870
1-4	0.10	0.316	10:47:50	69.73	1.80	123	86	85	3	1.830
1-5	0.09	0.300	10:50:00	71.56	1.60	124	87	85	3	1.750
1-6	0.08	0.283	10:52:50	73.31	1.50	125	87	85	3	1.690
1-7	0.08	0.283	10:55:00	75.00	1.50	125	87	85	3	1.680
1-8	0.08	0.283	10:57:50	76.68	1.50	126	88	85	3	1.650
1-9	0.07	0.265	11:00:00	78.33	1.30	127	88	86	3	1.550
1-10	0.07	0.265	11:02:50	79.88	1.30	128	88	86	3	1.530
1-11	0.06	0.245	11:05:00	81.41	1.10	129	88	86	3	1.470
1-12	0.06	0.245	11:07:50	82.88	1.10	129	88	86	3	1.432
			11:10:00	84.31						0.000
2-1	0.07	0.265	11:17:00	84.55	1.30	125	85	85	2	1.550
2-2	0.06	0.245	11:19:50	86.10	1.10	125	85	85	2	1.480
2-3	0.06	0.245	11:22:00	87.58	1.10	126	85	85	2	1.420
2-4	0.07	0.265	11:24:50	89.00	1.30	127	85	84	2	1.570
2-5	0.07	0.265	11:27:00	90.57	1.30	128	85	85	2	1.550
2-6	0.07	0.265	11:29:50	92.12	1.30	128	86	85	2	1.530
2-7	0.08	0.283	11:32:00	93.65	1.50	125	86	85	2	1.660
2-8	0.08	0.283	11:34:50	95.31	1.50	126	86	85	2	1.670
2-9	0.07	0.265	11:37:00	96.98	1.30	125	86	84	2	1.580
2-10	0.05	0.224	11:39:50	98.56	0.91	125	86	84	2	1.260
2-11	0.07	0.265	11:42:00	99.82	1.30	125	86	85	2	1.540
2-12	0.05	0.224	11:44:50	101.36	0.91	125	86	84	2	1.343
			11:47:00	102.70						0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
		0.270		38.105	1.36	126	86	85		38.105
							85.60			

METHOD 5 DATA ENTRY FORM

Field Data/Calculated Data

Company:	Nacme
Date:	4/16/02
Test Run:	2 M26A
Stack or Duct No.:	HCl Scrubber Stack
Start Time:	10:40
Stop Time:	11:47

Pb:	29.31	Inches Hg
Static	0.60	Inches H2O
Ps:	29.35	Inches Hg Abs.
Vlc:	99	ml + grams
Mn:	0.0000	gm
Test Time:	60	minutes
% O2:	20.90	%
% CO2:	0.00	%
% N2:	79.10	%
Delta H:	1.36	Inches H20
Cp:	0.836	Dimensionless - pitot
Tm:	86.80	°F
Sqrt P:	0.270	Inches H20
Ts:	126.58	°F
Vm:	38.105	Cubic Feet
Dn:	0.372	Inches - nozzle
As:	7.07	Sq. Feet
Yd:	1.011	Mcf
CF:	N/A	Process tons/hr
Heat Input:	N/A	MM BTU/hr
Fd:	N/A	dscf/10^6 Btu
Fc:	N/A	scf/10^8 Btu

Vmstd:	36.645	cubic feet (dry)
Vwstd:	4.668	cubic feet (wet)
Bwo:	0.113	
Md:	28.836	lb/lb-mole (dry)
Ms:	27.612	lb/lb-mole (wet)
Excess Air (%)	-118750.000	
Vs:	16.430	fps
ACFM:	6988.	
DSCFM:	5466.	
WSCFM:	6163	
%I:	104.7	Isokinetic variance
GR/ACF:	0.0000	
GR/DSCF:	0.0000	
lbs/hr	0.000	
lbs/ton prod.:	N/A	
lbs/MM BTU:	N/A	Heat Input
lbs/MM BTU:	N/A	O2 Basis
lbs/MM BTU:	N/A	CO2 Basis

PARTICULATE TRAVERSE DATA

Company: Nacme **Date:** 4/16/02 **Test Run.:** 3 M26A

Location: HCl Scrubber Stack

Point	Δp	Sq. Root Δp	Time	Volume cubic feet	ΔH	Stack Temp °F	Meter Inlet °F	Meter Outlet °F	Vacuum in. Hg	
1-1	0.08	0.283	12:25:00	2.90	1.50	124	87	87	2	1.663
1-2	0.08	0.283	12:27:50	4.56	1.50	124	87	87	2	1.640
1-3	0.09	0.300	12:30:00	6.20	1.60	123	88	87	2	1.770
1-4	0.08	0.283	12:32:50	7.97	1.50	124	88	87	2	1.680
1-5	0.08	0.283	12:35:00	9.65	1.50	124	88	87	2	1.630
1-6	0.09	0.300	12:37:50	11.28	1.60	125	88	88	2	1.790
1-7	0.08	0.283	12:40:00	13.07	1.50	122	89	88	2	1.630
1-8	0.07	0.265	12:42:50	14.70	1.30	122	89	88	2	1.560
1-9	0.07	0.265	12:45:00	16.26	1.30	123	89	88	2	1.570
1-10	0.07	0.265	12:47:50	17.83	1.30	124	89	88	2	1.540
1-11	0.07	0.265	12:50:00	19.37	1.30	125	89	88	2	1.570
1-12	0.06	0.245	12:52:50	20.94	1.10	126	89	88	2	1.459
			12:55:00	22.40						0.000
2-1	0.08	0.283	13:00:00	22.40	1.60	126	88	88	2	1.641
2-2	0.09	0.300	13:02:50	24.04	1.60	127	90	88	2	1.760
2-3	0.10	0.316	13:05:00	25.80	1.80	128	90	88	2	1.880
2-4	0.09	0.300	13:07:50	27.68	1.60	128	91	89	2	1.760
2-5	0.08	0.283	13:10:00	29.44	1.50	128	91	89	2	1.680
2-6	0.08	0.283	13:12:50	31.12	1.50	128	91	89	2	1.660
2-7	0.07	0.265	13:15:00	32.78	1.30	127	92	90	2	1.530
2-8	0.06	0.245	13:17:50	34.31	1.10	126	93	90	2	1.460
2-9	0.06	0.245	13:20:00	35.77	1.10	127	93	90	2	1.420
2-10	0.06	0.245	13:22:50	37.19	1.10	128	93	90	2	1.430
2-11	0.05	0.224	13:25:00	38.62	0.91	128	93	90	2	1.320
2-12	0.05	0.224	13:27:50	39.94	0.91	125	93	90	2	1.317
			13:30:00	41.26						0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
										0.000
		0.272		38.360	1.38	126	90	88		38.360
							89.17			

METHOD 5 DATA ENTRY FORM

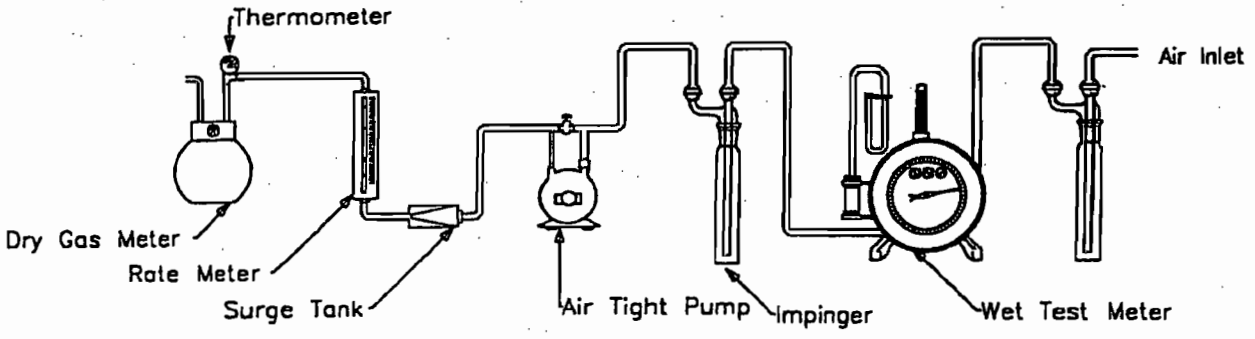
Field Data/Calculated Data

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

Pb:	29.31	Inches Hg
Static	0.50	Inches H2O
Ps:	29.35	Inches Hg Abs.
Vlc:	109	ml + grams
Mn:	0.0000	gm
Test Time:	60	minutes
% O2:	20.90	%
% CO2:	0.00	%
% N2:	79.10	%
Delta H:	1.38	Inches H20
Cp:	0.836	Dimensionless - pitot
Tm:	89.17	°F
Sqrt P:	0.272	Inches H20
Ts:	125.50	°F
Vm:	38.360	Cubic Feet
Dn:	0.372	Inches - nozzle
As:	7.07	Sq. Feet
Yd:	1.011	Mcf
CF:	N/A	Process tons/hr
Heat Input:	N/A	MM BTU/hr
Fd:	N/A	dscf/10^6 Btu
Fc:	N/A	scf/10^6 Btu

Vmstd:	36.663	cubic feet (dry)
Vwstd:	5.120	cubic feet (wet)
Bwo:	0.123	
Md:	28.836	lb/lb-mole (dry)
Ms:	27.508	lb/lb-mole (wet)
Excess Air (%)	-118750.000	
Vs:	16.558	fps
ACFM:	7022.	
DSCFM:	5450.	
WSCFM:	6211	
%I:	105.0	Isokinetic variance
GR/ACF:	0.0000	
GR/DSCF:	0.0000	
lbs/hr	0.000	
lbs/ton prod.:	N/A	
lbs/MM BTU:	N/A	Heat Input
lbs/MM BTU:	N/A	O2 Basis
lbs/MM BTU:	N/A	CO2 Basis

Gas Meter Calibration Train



Dwg - AF

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

EPA Control Module Number: E38 Name: TRJ

Ambient Temperature: 68 °F Date: 04-10-02

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

Date Of Calibration Verification: 04-12-00

ary Standards Directly Traceable to
National Institute of Standards and Technology (NIST)

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

[a]Every (50°F) for each reference point.

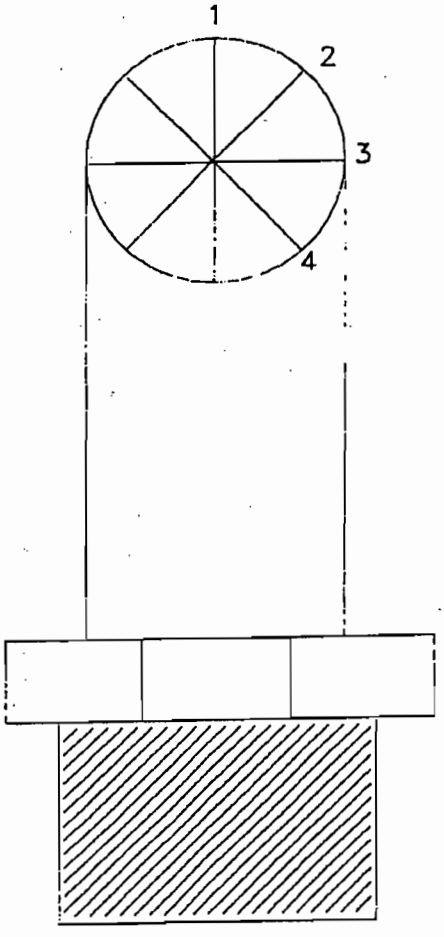
$$\frac{(\text{Ref. Temp., °F} + 460) - (\text{Test Therm. Temp., °F} + 460)}{\text{Ref. Temp., °F} + 460} * 100 <= 1.5\ \%$$

Nozzle Calibration

Date: 4/16/02

Nozzle ID No.: N/A

Analyst: A. Robinson



Pre Test		Post Test
0.373	1	√
0.372	2	√
0.371	3	√
0.372	4	√

Average
0.372

DWG-AN2 (indnozzl.xls)

ANALYTICAL BALANCE ACCURACY CHECK

Weight Set #100	Calibration Weights*	Torbal Balance EA-1	Sartorius Balance A210P	Sartorius Balance 1702
100 g	100.0006	–	100.0004	100.0001
50 g	50.0002	49.9997	49.9998	50.0001
30 g	30.0000	29.9999	30.0002	30.0000
20 g	20.0000	20.0000	20.0001	20.0000
10 g	10.0000	10.0000	9.9999	10.0000
5 g	5.0000	5.0002	5.0001	5.0000
3 g	3.0000	3.0000	3.0000	3.0000
1 g	1.0000	1.0000	1.0000	1.0004
0.500 g	0.5000	0.5003	0.4998	0.4999
0.300 g	0.3000	0.3000	0.2999	0.2999
0.200 g	0.2000	0.2000	0.1998	0.2000
0.100 g	0.1000	0.1000	0.1000	0.1000
0.050 g	0.0500	0.0497	0.0499	0.0500
0.030 g	0.0300	0.0297	0.0299	0.0299
0.020 g	0.0200	0.0202	0.0202	0.0200

Analyst: E. VOLOMARSKY Date: 04.15.02

* Calibration by M and R Balance Service, Chicago, Illinois 10/10/01.

Note: Each weight must be within 0.5 mg of the mass determined on the 10/10/01 calibration.

Torbal: Model EA-1, Serial No. 168491.
Sartorius: Model A210P, Serial No. 3710004.
Sartorius: Model 1702, Serial No. 3502267

GE MOSTARDI PLATT
TEST SUPPORT DATA

TEST RUN NO. 1 M26A

COMPANY: NACME
PLANT: Chicago IL
TEST LOCATION: HCL Scrubber Stack
CLIENT: NACME
OPERATOR: A. Robinson
DATE: 4-16-02
CONTROL BOX: E38 POT. NO.: E38
METER NO.: E38
METER CALIBRATION FACTOR: 1.011
PITOT ID NO.: 628A
PITOT TUBE COEFFICIENT: 0.836
PORT LENGTH: 3 in.
PORT SIZE: 4 in.
PORT TYPE: nipple

IMPINGER H_2O SILICA GEL:
FINAL: 536 ml/gm FINAL WT: 221.9 gm
INITIAL: 450 ml/gm INITIAL WT: 215.5 gm
GAIN: 86 ml/gm WT. GAIN: 6.4 gm
TOTAL H_2O COLLECTED:
DESCRIPTION OF IMPINGER H_2O:
SILICA GEL EXHAUSTED?:
IMPINGERS RECOVERED BY:
SILICA GEL WEIGHED BY:

COMMENTS & NOTES

THIMBLE NO: N/A TARE WT: N/A
FILTER NO: TARE WT: no weight
BAROMETRIC PRESSURE in. Hg: 29.31
FLUE PRESSURE in. H_2O: +0.5
FLUE PRESSURE in. Hg ABS: 29.347
PROBE LENGTH: 3.5 ft.
PROBE LINER MATERIAL: Glass
NOZZLE IDENTIFICATION NO: N/A
CALIBRATED NOZZLE DIAMETER: 0.372
LEAK CHECK: PRE: 0.002 POST: 0.000 @ 12"/9" in. Hg
DUCT SHAPE: circular DIAMETER: 3.0
DUCT AREA: 7.0686 sq. ft. L W
DISTURBANCE UPSTREAM: DOWNSTREAM:
TEST LENGTH: 60 min
MINUTES PER POINT: 2.5
TOTAL NUMBER OF TRAVERSE POINTS: 24
GAS ANALYSIS (ORSAT/FYRITE):
CO_2: 0
O_2: 20.5

PITOT LEAK CHECK: PRE ✓ POST ✓
ΔH@
SAMPLES REMOVED FROM SITE BY:

For computer data entry: Supervisor, please complete.
Do you want to enter a fuel analysis? Y ☐ N ☐
What value do you want to use? F = 9,780 F_c = 1,800 Other =
Circle to indicate "Yes" or add other value if not given.

Form 1051

Customer _____

Test Location HCl Scrubber Stack

PROCEDURE FOR DETERMINING PERCENT MOISTURE AT SATURATED CONDITIONS IN A SUPERSATURATED GAS STREAM

Determine the following parameters:

Barometric Pressure, P_{bar}	29.31 "Hg
Static Pressure, P_g = _____ "H_2O/13.6 =	0.5 "Hg
Absolute Flue Gas Pressure, $P_s = P_{bar} + P_g$ =	29.35 "Hg
Average Flue Gas Temperature, t_s	126.17 °F
Saturated Vapor Pressure of Water at t_s, V.P.	4.063 "Hg
Total Volume of Liquid Collected in impingers and silica gel by the condensation method, V_{lc}	92.40 mls
Moisture Content determined by condensation method, percent by volume = $B_{ws} \times 100$	10.4 %
Dry Gas Sample Volume as measured by dry gas meter, corrected to standard conditions, $V_{m(std)}$	37.633 ft³

1. Theoretical maximum water vapor content, percent by volume, in a saturated gas stream

$$\% \text{ Moisture (saturated)} = \frac{\text{V.P.}}{P_s} \times 100 = \underline{13.8}\ \%$$

2. Moisture content in the form of water droplets in the supersaturated gas stream, expressed here as percent by volume for the purpose of comparison

$$\% \text{ Moisture (droplets)} = \left(B_{WS} \times 100\right) - \% \text{ Moisture (saturated)} = \_\_\_\_\_\ \%$$

3. Milliliters of actual collected condensate attributable to the theoretical saturation water vapor content of the gas stream

$$V_{lc}\ (\text{saturated}) = \frac{\left(\frac{V_{m(std)}}{1 - \frac{\% \text{ Moisture (saturated)}}{100}}\right) - V_{m(std)}}{0.04707} = \_\_\_\_\_\ \text{mls}^*$$

*This number replaces V_{lc} in all calculations involving supersaturated gas streams.

4. Water droplet concentration, using 1 milliliter H_2O = 1 gram

$$\frac{\left[V_{lc} - V_{lc}\ (\text{saturated})\right] \times 15.43}{\left[0.04707 \times V_{lc}\ (\text{saturated})\right] + V_{m(std)}} = \text{grains/scf}$$

Rationale: When dealing with supersaturated gas streams as for example, after some scrubbers and certain water injection systems, the moisture that is not in the form of water vapor must be separated from that which is in the vapor state in order to correctly determine the volumetric gas flow rate at actual conditions. In these situations, the value for B_{ws} to be used in all calculations will be equal to the % Moisture (saturated) divided by 100. These calculations include those for all volumetric flow rates, wet molecular weight of the gas, pollutant concentrations and emission rates on a wet basis, and the isokinetic sampling rates and the final isokinetic variances. All additional moisture condensed in the impingers and collected in the silica gel is considered to be excess moisture attributable to water droplets, not water vapor in the gas stream.

FIELD TEST DATA SHEET
FOR ISOKINETIC SAMPLING

GE MOSTARDI PLATT

PROJECT NALME
TEST RUN NO. 2 M26A
TEST LOCATION HCL Scrubber Stack
DATE 4-16-02 PAGE 1 OF 1

18.20 90° 17.87 60° 2.35 60° 2.31 80°

Port-Point No.	Velocity Head (P) in. H_2O	$\sqrt{P}$	Clock Time 24 hr.	Meter Volume (Vm) ft^3	Orifice. (H) in. H_2O	Stack Temp (t_s) °F	Meter Temp. (t_m) Inlet °F	Meter Temp. (t_m) Outlet °F	Meter Rate cfm	Pump Vacuum in. Hg	Notes		Probe Temp. °F	Filter Holder Temp. °F	Impinger Outlet Temp. °F
11	0.09	0.300	1040	64.360	1.6	123	85	85	0.705	3	1.763		242	245	62
2	0.09	0.300	1042.5	66.14	1.6	123	85	85	0.693	3	1.733	66.123	248	251	61
3	0.10	0.316	1045	67.86	1.8	122	85	85	0.743	3	1.858	67.856	250	252	63
4	0.10	0.316	1047.5	69.73	1.8	123	86	85	0.743	3	1.856	69.714	255	251	64
5	0.09	0.300	1050	71.56	1.6	124	87	85	0.705	3	1.763	71.570	255	252	66
6	0.08	0.283	1052.5	73.31	1.5	125	87	85	0.665	3	1.662	73.333	257	255	67
7	0.08	0.283	1055	75.00	1.5	125	87	85	0.665	3	1.662	74.995	258	256	65
8	0.08	0.283	1057.5	76.68	1.5	126	88	85	0.665	3	1.662	76.657	258	259	66
9	0.07	0.265	1100	78.33	1.3	127	88	86	0.622	3	1.554	78.319	258	257	67
10	0.07	0.265	1102.5	79.88	1.3	128	88	86	0.622	3	1.554	79.873	257	257	65
11	0.06	0.245	1105	81.41	1.1	129	88	86	0.576	3	1.439	81.427	257	254	66
12	0.06	0.245	1107.5	82.888	1.1	129	88	86	0.576	3	1.439	82.866	257	255	65
	11		1110	84.312								84.305			
21	0.07	0.265	1117	84.550	1.3	125	85	85	0.622	2	1.554		254	258	65
2	0.06	0.245	1119.5	86.10	1.1	125	85	85	0.576	2	1.439	86.104	257	257	67
3	0.06	0.245	1122	87.50	1.1	126	85	85	0.576	2	1.439	87.543	256	256	65
4	0.07	0.265	1124.5	89.00	1.3	127	85	84	0.622	2	1.554	88.987	257	261	66
5	0.07	0.265	1127	90.57	1.3	128	85	85	0.622	2	1.554	90.536	257	257	68
6	0.07	0.265	1129.5	92.12	1.3	128	86	85	0.622	2	1.554	92.090	258	258	65
7	0.08	0.283	1132	93.65	1.5	125	86	85	0.665	2	1.662	93.644	258	259	66
8	0.08	0.283	1134.5	95.31	1.5	126	86	85	0.665	2	1.662	95.306	256	258	67
9	0.07	0.265	1137	96.98	1.3	125	86	84	0.622	2	1.554	96.968	257	260	65
10	0.05	0.224	1139.5	98.56	0.91	125	86	84	0.525	2	1.314	98.522	257	258	65
11	0.07	0.265	1142	99.82	1.3	125	86	85	0.622	2	1.554	95.836	257	259	65
12	0.05	0.224	1144.5	101.36	0.91	125	86	84	0.525	2	1.314	101.390	257	259	65
			1147	102.703			(2069)	(2040)				102.704			
		.2706		38.343	1.365	128.383		85.604							

IEPA FOIA 0425

GE MOSTARDI PLATT
TEST SUPPORT DATA

TEST RUN NO. 3 M26A

COMPANY: NALME
PLANT: Chicago IL
TEST LOCATION: HCL scrubber Stack
CLIENT: NAlme
OPERATOR: A. Robinson
DATE: 4-16-02
CONTROL BOX: E38 POT. NO.: E38
METER NO.: E38
METER CALIBRATION FACTOR: 1.011
PITOT ID NO.: 628A
PITOT TUBE COEFFICIENT: 0.836
PORT LENGTH: 5 in.
PORT SIZE: 4 in.
PORT TYPE: nipple

IMPINGER H_2O

FINAL: 553 ml/gm
INITIAL: 450 ml/gm
GAIN: 103 ml/gm

SILICA GEL:

FINAL WT: 209.2 gm
INITIAL WT: 203.5 gm
WT. GAIN: 5.7 gm

TOTAL H_2O COLLECTED:
DESCRIPTION OF IMPINGER H_2O:
SILICA GEL EXHAUSTED?:
IMPINGERS RECOVERED BY:
SILICA GEL WEIGHED BY:

COMMENTS & NOTES

THIMBLE NO: N/A TARE WT: N/A
FILTER NO: TARE WT: no weight
BAROMETRIC PRESSURE in. Hg: 29.31
FLUE PRESSURE in. H_2O: +0.5
FLUE PRESSURE in. Hg ABS:
PROBE LENGTH: 3.5 ft.
PROBE LINER MATERIAL: Glass
NOZZLE IDENTIFICATION NO: N/A
CALIBRATED NOZZLE DIAMETER: 0.372
LEAK CHECK: PRE: 0.000 POST: 0.002 @ 10"/10" in. Hg
DUCT SHAPE: Circle DIAMETER: 3'
DUCT AREA: sq. ft. L W
DISTURBANCE UPSTREAM: DOWNSTREAM:
TEST LENGTH: 60 min
MINUTES PER POINT: 2.5
TOTAL NUMBER OF TRAVERSE POINTS: 24
GAS ANALYSIS (ORSAT/FYRITE):
CO_2: 0
O_2: 20.9
PITOT LEAK CHECK: PRE ✓ POST ✓
ΔH@
SAMPLES REMOVED FROM SITE BY:

For computer data entry: Supervisor, please complete.
Do you want to enter a fuel analysis? Y ☐ N ☐
What value do you want to use? F = 9,780 F_o = 1,800 Other =
Circle to indicate "Yes" or add other value if not given.

Form 1053

Customer: Nacm 2 Test No. 2

Test Location HCl Scrubber Stack

PROCEDURE FOR DETERMINING PERCENT MOISTURE AT SATURATED CONDITIONS IN A SUPERSATURATED GAS STREAM

Determine the following parameters:

Barometric Pressure, P_{bar}	29.31 "Hg
Static Pressure, P_g = _____ "H_2O/13.6 =	0.5 "Hg
Absolute Flue Gas Pressure, $P_s = P_{bar} + P_g$ =	29.35 "Hg
Average Flue Gas Temperature, t_s	125.50 °F
Saturated Vapor Pressure of Water at t_s, V.P.	4.065 "Hg
Total Volume of Liquid Collected in impingers and silica gel by the condensation method, V_{lc}	108.7 mls
Moisture Content determined by condensation method, percent by volume = $B_{ws} \times 100$	12.3 %
Dry Gas Sample Volume as measured by dry gas meter, corrected to standard conditions, $V_{m(std)}$	36.653 ft³

1. Theoretical maximum water vapor content, percent by volume, in a saturated gas stream

$$\% \text{ Moisture (saturated)} = \frac{\text{V.P.}}{P_s} \times 100 = 13.8 \%$$

2. Moisture content in the form of water droplets in the supersaturated gas stream, expressed here as percent by volume for the purpose of comparison

$$\% \text{ Moisture (droplets)} = \left(B_{ws} \times 100\right) - \% \text{ Moisture (saturated)} = \_\_\_\_\_ \%$$

3. Milliliters of actual collected condensate attributable to the theoretical saturation water vapor content of the gas stream

$$V_{lc} \text{ (saturated)} = \frac{\left(\frac{V_{m(std)}}{1 - \frac{\% \text{ Moisture (saturated)}}{100}}\right) - V_{m(std)}}{0.04707} = \_\_\_\_\_ \text{ mls}^*$$

*This number replaces V_{lc} in all calculations involving supersaturated gas streams.

4. Water droplet concentration, using 1 milliliter H_2O = 1 gram

$$\frac{\left[V_{lc} - V_{lc} \text{ (saturated)}\right] \times 15.43}{\left[0.04707 \times V_{lc} \text{ (saturated)}\right] + V_{m(std)}} = \text{grains/scf}$$

Rationale: When dealing with supersaturated gas streams as for example, after some scrubbers and certain water injection systems, the moisture that is not in the form of water vapor must be separated from that which is in the vapor state in order to correctly determine the volumetric gas flow rate at actual conditions. In these situations, the value for B_{ws} to be used in all calculations will be equal to the % Moisture (saturated) divided by 100. These calculations include those for all volumetric flow rates, wet molecular weight of the gas, pollutant concentrations and emission rates on a wet basis, and the isokinetic sampling rates and the final isokinetic variances. All additional moisture condensed in the impingers and collected in the silica gel is considered to be excess moisture attributable to water droplets, not water vapor in the gas stream.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 5
MAY 16, 2002 PERMIT DENIAL ("2002 OPERATIONAL PERMIT DENIAL")

217/782-2113 CERTIFIED MAIL

PERMIT DENIAL

May 16, 2002

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

Application No.:	96020074
I.D. No.:	031600FWL
Applicant's Designation:	PICKLING
Date Received:	April 12, 2002
Operation of:	Steel Pickling Line
Location:	429 West 127th Street, Chicago, 60628

The Illinois EPA has reviewed your Application for Operating Permit for the above referenced project. The permit application is DENIED because Sections 9 and 39.5 of the Illinois Environmental Protection Act and 35 Ill. Adm. Code, Section 201.160 might be violated.

The following are specific reasons why the Act and the Rules and Regulations may not be met:

1. This application covers equipment for which the Illinois EPA previously granted a construction permit 01040081. This permit included a condition that an emission test be performed by an approved testing service. This test has not been performed, therefore, an operating permit may not be granted pursuant to 35 Ill. Adm. Code 201.160(b)(2) and (3).

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

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

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

DES:VJB

cc: Region 1
Bob Sharpe, Enforcement

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 6
MARCH 30, 2005 APPLICATION FOR RENEWAL OF FEDERALLY ENFORCEABLE STATE OPERATING PERMIT SUBMITTED BY NACME ("APRIL 2005 SOP RENEWAL")

NATIONAL PROCESSING COMPANY
Division of National Material L.P.

429 W. 127th Street
Chicago, Illinois 60628
Phone: 773-468-2800 • Fax: 773-468-2868

March 23, 2005

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

Dear Mr. Sutton:

Enclosed please find two copies of the completed Illinois Environmental Protection Agency APC Form 205A application for Operating Permit renewal, prepared for the NACME Steel Processing, LLC facility (ID No. 031600FWL) located at 429 West 127th Street in Chicago, Illinois.

Should you have any question concerning this submittal, please contact Ms. Karyn Schoch, MOSTARDI PLATT ENVIRONMENTAL, at 630-993-2680.

Sincerely,

NACME STEEL PROCESSING, LLC

John Dubrock
Director of Operations

Enclosures

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

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

1700 0005 9255

APPLICATION FOR RENEWAL OF A FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OPERATION OF: PICKLING (A)

FOR AGENCY USE ONLY
I.D. NO. 031600FWL
PERMIT NO. 96020074
DATE 4-4-05

1a. NAME OF OWNER: National Materials L.P.		2a. NAME OF OPERATOR: NACME Steel Processing, LLC	
1b. STREET ADDRESS OF OWNER: 1985 Pratt Boulevard		2b. STREET ADDRESS OF OPERATOR: 429 West 127th Street	
1c. CITY OF OWNER: Elk Grove Village		2c. CITY OF OPERATOR: Chicago	
1d. STATE OF OWNER: Illinois	1e. ZIP CODE: 60007	2d. STATE OF OPERATOR: Illinois	2e. ZIP CODE: 60628

3a. NAME OF CORPORATE DIVISION OR PLANT: NACME Steel Processing, LLC.		3b. STREET ADDRESS OF EMISSION SOURCE: 429 West 127th Street		
3c. CITY OF EMISSION SOURCE: Chicago	3d. LOCATED WITHIN CITY LIMITS: ☒ YES ☐ NO	3e. TOWNSHIP:	3f. COUNTY: Cook	3g. ZIP CODE: 60628

4. ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) Mr. John Dubrock	5. TELEPHONE NUMBER FOR AGENCY TO CALL: 219-391-6012
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE)	☐ OWNER ☒ OPERATOR ☐ EMISSION SOURCE

7. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATION REMAINS TRUE, CORRECT AND CURRENT. BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

AUTHORIZED SIGNATURE(S): (B)

BY _____ (SIGNATURE) 3/30/05 (DATE)
John Dubrock (TYPED OR PRINTED NAME OF SIGNER)
Director of Operations (TITLE OF SIGNER)

BY _____ (SIGNATURE) _____ (DATE)
_____ (TYPED OR PRINTED NAME OF SIGNER)
_____ (TITLE OF SIGNER)

(A) THIS FORM IS TO PROVIDE THE ILLINOIS EPA WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE OPERATED.

(B) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH 35 ILL. ADM. CODE 201.154 OR 201.159 WHICH STATES: "ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

IF THE OWNER OR OPERATOR IS A CORPORATION, SUCH CORPORATION MUST HAVE ON FILE WITH THE ILLINOIS EPA A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONSTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.

SITE FEE BILLING INFORMATION		10. CONTACT PERSON FOR APPLICATION: Karyn Schoch	
9a. COMPANY NAME: NACME Steel Processing, LLC.		11. CONTACT PERSON'S TELEPHONE NUMBER 630-993-2680	
9b. STREET ADDRESS: 429 West 127th Street		12. CONTACT PERSON'S FACSIMILE NUMBER: 630-993-9017	
9c. CITY Chicago		13. FEDERAL EMPLOYER IDENTIFICATION NUMBER (FEIN): 36-4035553	
9d. STATE: Illinois	9f. BILLING CONTACT PERSON: Bill Reichle	14. PRIMARY STANDARD INDUSTRIAL CLSSSIFICATION (SIC) CATEGORY Cold-Rolled Steel Sheet, Strip, and Bars	
9e. ZIP CODE: 60628	9g. CONTACT TELEPHONE NO. 773-291-1301	15. PRIMARY SIC NUMBER: 3316	16. TAXPAYER IDENTIFICATION NUMBER (TIN):

17a. I.D. NO. 0 3 1 6 0 0 F W L

17b. HAS THE OPERATION AS DESCRIBED IN THE FESOP APPLICATION BEEN MODIFIED* AS DEFINED IN 35 ILL. ADM. CODE 201.102?

☐ YES ☒ NO

IF "YES", SUBMIT THE APPLICABLE FORM(S) AND UPDATED FLOW DIAGRAM(S).

17c. DATE THE OPERATION WAS MODIFIED: ___ ___ ___

* MODIFICATION: ANY PHYSICAL CHANGE IN, OR CHANGE IN THE METHOD OF OPERATIONS OF, AN EMISSION SOURCE OR OF AIR POLLUTION CONTROL EQUIPMENT WHICH INCREASES THE AMOUNT OF ANY SPECIFIED AIR CONTAMINANT EMITTED BY SUCH SOURCE OR EQUIPMENT OR WHICH RESULTS IN THE EMISSION OF ANY SPECIFIED AIR CONTAMINANT NOT PREVIOUSLY EMITTED. IT SHALL BE PRESUMED THAT AN INCREASE IN THE USE OF RAW MATERIALS, THE TIME OF OPERATION, OR THE RATE OF PRODUCTION WILL CHANGE THE AMOUNT OF ANY SPECIFIED AIR CONTAMINANT EMITTED. NOT WITHSTANDING ANY OTHER PROVISIONS OF THIS DEFINITION, FOR PURPOSES OF PERMITS ISSUED PURSUANT TO SUBPART D, THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MAY SPECIFY CONDITIONS UNDER WHICH AN EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT MAY BE OPERATED WITHOUT CAUSING A MODIFICATION AS HEREIN DEFINED, AND NORMAL CYCLICAL VARIATIONS, BEFORE THE DATE OPERATING PERMITS ARE REQUIRED, SHALL NOT BE CONSIDERED MODIFICATIONS 35 ILL. ADM. CODE 201.102.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 7
APRIL 13, 2005 NOTICE OF INCOMPLETENESS ("APRIL 2005 NOTICE OF INCOMPLETENESS")

217/782-2113 CERTIFIED MAIL

NOTICE OF INCOMPLETENESS

April 13, 2005

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

Application No.:	96020074
I.D. No.:	031600FWL
Applicant's Designation:	
Date Received:	April 4, 2005
Operation of:	Steel Pickling Plant
Location:	429 West 127th Street, Chicago

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

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

1. Updated information on production rate and emissions based on the most recent stack test (April 16, 2002) data.

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

   If emission calculations demonstrate that actual or potential emission of HAP exceeds major source threshold levels of 10 tons/year for a single HAP the Permittee shall apply for Clean Air Act Permit Program (CAAPP) permit. To avoid the CAAPP permitting requirements, you may want to consider applying for a Federally Enforceable State Operating Permit (FESOP). A FESOP is an operating permit that contains federally enforceable limits in the form of permit conditions which effectively restrict the potential emissions of a source to below major source threshold, thereby excluding the source from the Clean Air Act Permit Program (CAAPP).

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

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

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

DES:VJB:jar

cc: Region 1

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

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

AIR EMISSION SOURCE OPERATING PERMIT RENEWAL APPLICATION

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

August 23, 2005

MOSTARDI PLATT PROJECT M046005 (Renewal Application)

TABLE OF CONTENTS

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

APPLICATION FOR PERMIT(A) ☐ CONSTRUCT ☒ OPERATE	FOR AGENCY USE ONLY
NAME OF EQUIPMENT TO BE CONSTRUCTED OR OPERATED (B): ***HCL Steel Pickling Line, HCL-ASTs***	I.D. NO. _____ PERMIT NO. _____ DATE _____

1a. NAME OF OWNER: ***National Materials, LP***	2a. NAME OF OPERATOR: ***NACME Steel Processing, LLC***
1b. STREET ADDRESS OF OWNER: ***1965 Pratt Boulevard***	2b. STREET ADDRESS OF OPERATOR: ***429 West 127th Street***
1c. CITY OF OWNER: ***Elk Grove Village***	2c. CITY OF OPERATOR: ***Chicago***
1d. STATE OF OWNER: ***Illinois*** / 1e. ZIP CODE: ***60007***	2d. STATE OF OPERATOR: ***Illinois*** / 2e. ZIP CODE: ***60628***

3a. NAME OF CORPORATE DIVISION OR PLANT: ***NACME Steel Processing***		3b. STREET ADDRESS OF EMISSION SOURCE: ***429 West 127th Street***		
3c. CITY OF EMISSION SOURCE: ***Chicago***	3d. LOCATED WITHIN CITY LIMITS: ☒ YES ☐ NO	3e. TOWNSHIP:	3f. COUNTY: ***Cook***	3g. ZIP CODE: ***60628***

4. ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) ***John Dubrock***	5. TELEPHONE NUMBER FOR AGENCY TO CALL: ***219-391-6012***
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE) ☐ OWNER ☒ OPERATOR ☐ EMISSION SOURCE	7. YOUR DESIGNATION FOR THIS APPLICATION:(C) ***Steel Pickling***

8. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATIONS REMAINS TRUE, CORRECT AND CURRENT, BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

AUTHORIZED SIGNATURE(S):(D)

BY _____ SIGNATURE _____ DATE
William Riechle TYPED OR PRINTED NAME OF SIGNER
Plant Manager TITLE OF SIGNER

BY _____ SIGNATURE _____ DATE
_____ TYPED OR PRINTED NAME OF SIGNER
_____ TITLE OF SIGNER

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS FORM MAY BE USED TO REQUEST A CONSTRUCTION PERMIT, AN OPERATING PERMIT, A CONSTRUCTION OR OPERATING PERMIT.

(B) ENTER THE GENERIC NAME OF THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS NAME WILL APPEAR ON THE PERMIT, WHICH MAY BE ISSUED PURSUANT TO THIS APPLICATION. THIS FORM MUST BE ACCOMPANIED BY OTHER APPLICABLE FORMS AND INFORMATION.

(C) PROVIDE A DESIGNATION IN ITEM 7 ABOVE WHICH YOU WOULD LIKE THE AGENCY TO USE FOR IDENTIFICATION OF YOUR EQUIPMENT. YOUR DESIGNATION WILL BE REFERENCED IN CORRESPONDENCE FROM THIS AGENCY RELATIVE TO THIS APPLICATION. YOUR DESIGNATION **MUST NOT** EXCEED TEN (10) CHARACTERS.

(D) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH 35 ILL. ADM. CODE 201.154 OR 201.159 WHICH STATES: "ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

IF THE OWNER OR OPERATOR IS A CORPORATION, SUCH CORPORATION MUST HAVE ON FILE WITH THE AGENCY A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONSTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.

9. DOES THIS APPLICATION CONTAIN A PLOT PLAN/MAP:
☐ YES ☒ NO

IF A PLOT PLAN/MAP HAS PREVIOUSLY BEEN SUBMITTED, SPECIFY:
AGENCY I.D. NUMBER *031600FWL* APPLICATION NUMBER *96020074*

IS THE APPROXIMATE SIZE OF APPLICANT'S PREMISES LESS THAN 1 ACRE?
☒ YES ☐ NO: SPECIFY ACRES *43*

10. DOES THIS APPLICATION CONTAIN A PROCESS FLOW DIAGRAM(S) THAT ACCURATELY AND CLEARLY REPRESENTS CURRENT PRACTICE.
☒ YES ☐ NO

11a. WAS ANY EQUIPMENT, COVERED BY THIS APPLICATION, OWNED OR CONTRACTED FOR, BY THE APPLICANT PRIOR TO APRIL 14, 1972:
☐ YES ☒ NO

IF "YES," ATTACH AN ADDITIONAL SHEET, EXHIBIT A, THAT:

(a) LISTS OR DESCRIBES THE EQUIPMENT

(b) STATES WHETHER THE EQUIPMENT WAS IN COMPLIANCE WITH THE RULES AND REGULATIONS GOVERNING THE CONTROL OF AIR POLLUTION PRIOR TO APRIL 4, 1972

11b. HAS ANY EQUIPMENT, COVERED BY THIS APPLICATION, NOT PREVIOUSLY RECEIVED AN OPERATING PERMIT:
☐ YES ☒ NO

IF "YES," ATTACH AN ADDITIONAL SHEET, EXHIBIT B, THAT:

(a) LISTS OR DESCRIBES THE EQUIPMENT

(b) STATES WHETHER THE EQUIPMENT

(i) IS ORIGINAL OR ADDITIONAL EQUIPMENT
(ii) REPLACES EXISTING EQUIPMENT, OR
(iii) MODIFIES EXISTING EQUIPMENT

(c) PROVIDES THE ANTICIPATED OR ACTUAL DATES OF THE COMMENCEMENT OF CONSTRUCTION AND THE START-UP OF THE EQUIPMENT

12. IF THIS APPLICATION INCORPORATES BY REFERENCE A PREVIOUSLY GRANTED PERMIT(S), HAS FORM APC-210, "DATA AND INFORMATION--INCORPORATION BY REFERENCE" BEEN COMPLETED.
☐ YES ☒ NO

13. DOES THE STARTUP OF AN EMISSION SOURCE COVERED BY THIS APPLICATION PRODUCE AIR CONTAMINANT EMISSION IN EXCESS OF APPLICABLE STANDARDS:
☐ YES ☒ NO

IF "YES," HAS FORM APC-203, "OPERATION DURING STARTUP" BEEN COMPLETED FOR THIS SOURCE
☐ YES ☐ NO

14. DOES THIS APPLICATION REQUEST PERMISSION TO OPERATE AN EMISSION SOURCE DURING MALFUNCTION OR BREAKDOWNS:
☐ YES ☒ NO

IF "YES," HAS FORM APC-204, "OPERATION DURING MALFUNCTION AND BREAKDOWN" BEEN COMPLETED FOR THIS SOURCE
☐ YES ☐ NO

15. IS AN EMISSION SOURCE COVERED BY THIS APPLICATION SUBJECT TO A FUTURE COMPLIANCE DATE:
☐ YES ☒ NO

IF "YES," HAS FORM APC-202, "COMPLIANCE PROGRAM & PROJECT COMPLETION SCHEDULE," BEEN COMPLETED FOR THIS SOURCE:
☐ YES ☐ NO

16. DOES THE FACILITY COVERED BY THIS APPLICATION REQUIRE AN EPISODE ACTION PLAN (REFER TO GUIDELINES FOR EPISODE ACTION PLANS):
☐ YES ☒ NO

17. LIST AND IDENTIFY ALL FORMS, EXHIBITS, AND OTHER INFORMATION SUBMITTED AS PART OF THIS APPLICATION. INCLUDE THE PAGE NUMBERS OF EACH ITEM (ATTACH ADDITIONAL SHEETS IF NECESSARY):

See Table of Contents

TOTAL NUMBER OF PAGES

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

DATA AND INFORMATION INCORPORATION BY REFERENCE	FOR AGENCY USE ONLY

THIS FORM IS TO BE USED TO INCORPORATE OR TRANSFER INFORMATION FROM ONE PERMIT APPLICATION TO ANOTHER, INCLUDING THE TRANSFER OF INFORMATION FROM A CONSTRUCTION PERMIT APPLICATION INTO AN OPERATING PERMIT APPLICATION. THIS FORM SHOULD ACCOMPANY THE APPLICATION INTO WHICH INFORMATION IS BEING TRANSFERRED.

1. NAME OF OWNER:	2. NAME OF CORPORATE DIV. OR PLANT (IF DIFFERENT FROM OWNER):	
National Materials L. P.	***NACME Steel Processing, LLC***	
3. STREET ADDRESS OF EMISSION SOURCE:	4. CITY OF EMISSION SOURCE:	5. IDENTIFICATION NUMBER:
429 West 127th Street	***Chicago***	***031600FWL***

6. APPLICATION NUMBER:	7. ☐ CONSTRUCTION ☒ OPERATION OF
96020074	***Steel Pickling Line***

8. SHOULD ALL INFORMATION IN THIS APPLICATION BE INCORPORATED BY REFERENCE OR TRANSFERRED?
☒ YES ☐ NO
IF "NO", LIST ITEMS TO BE INCORPORATED:

9a. ITEM TO BE INCORPORATED:	b. PAGE	c. FLOW DIAGRAM DESIGNATION (IF APPLICABLE):
All		

10. DOES THE DATA & INFORMATION DESCRIBING THESE ITEMS REMAIN TRUE, CORRECT, CURRENT AND COMPLETE?
☐ YES ☒ NO
IF "NO", SUBMIT THE APPLICABLE FORMS AND CLEARLY STATE THE DATA AND INFORMATION WHICH IS NO LONGER TRUE, CORRECT, CURRENT AND COMPLETE.

11. APPLICATION NUMBER:	12. ☐ CONSTRUCTION ☐ OPERATION OF

13. SHOULD ALL INFORMATION IN THIS APPLICATION BE INCORPORATED BY REFERENCE OR TRANSFERRED?
☐ YES ☐ NO
IF "NO", LIST ITEMS TO BE INCORPORATED:

14a. ITEM TO BE INCORPORATED:	b. PAGE	c. FLOW DIAGRAM DESIGNATION (IF APPLICABLE):

15. DOES THE DATA & INFORMATION DESCRIBING THESE ITEMS REMAIN TRUE, CORRECT, CURRENT AND COMPLETE?
☐ YES ☐ NO
IF "NO", SUBMIT THE APPLICABLE FORMS AND CLEARLY STATE THE DATA AND INFORMATION WHICH IS NO LONGER TRUE, CORRECT, CURRENT AND COMPLETE.

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

*DATA AND INFORMATION PROCESS EMISSION SOURCE	

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

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

GENERAL INFORMATION		
5. NAME OF PROCESS: ***HCL Steel Pickling***	6. NAME OF EMISSION SOURCE EQUIPMENT: ***Enclosed Steel Pickling Line***	
7. EMISSION SOURCE EQUIPMENT MANUFACTURER: ***PRO-ECO***	8. MODEL NUMBER:	9. SERIAL NUMBER:
10. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE: ***SPL1***		
11. IDENTITY(S) OF ANY SIMILAR SOURCE(S) AT THE PLANT OR PREMISES NOT COVERED BY THE FORM (IF THE SOURCE IS COVERED BY ANOTHER APPLICATION, IDENTIFY THE APPLICATION): ***N/A***		
12. AVERAGE OPERATING TIME OF EMISSION SOURCE: ***24*** HRS/DAY ***7*** DAYS/WK ***52*** WKS/YR	13. MAXIMUM OPERATING TIME OF EMISSION SOURCE: ***24*** HRS/DAY ***7*** DAYS/WK ***52*** WKS/YR	
14. PERCENT OF ANNUAL THROUGHPUT: DEC-FEB ***25***% MAR-MAY ***25***% JUN-AUG ***25***% SEPT-NOV ***25***%		

INSTRUCTIONS

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

DEFINITIONS

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

090-008

RAW MATERIAL INFORMATION					
NAME OF RAW MATERIAL		AVERAGE RATE PER IDENTICAL SOURCE		MAXIMUM RATE PER IDENTICAL SOURCE	
20a.	*Steel Coils*	b. *171,233*	LB/HR	c. *171,233*	LB/HR
21a.	*HCL Solution*	b. *2,200*	LB/HR	c. *2,200*	LB/HR
22a.	*Water*	b. *34,000*	LB/HR	c. *34,000*	LB/HR
23a.		b.	LB/HR	c.	LB/HR
24a.		b.	LB/HR	c.	LB/HR

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

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

*FUEL USAGE INFORMATION – *Not Applicable*			
FUEL USED		TYPE	HEAT CONTENT
50a.	NATURAL GAS ☐	b.	c. BTU/SCF
	OTHER GAS ☐		BTU/SCF
	OIL ☐		BTU/GAL
	COAL ☐		BTU/LB
	OTHER ☐		BTU/LB
d. AVERAGE FIRING RATE PER IDENTICAL SOURCE: BTU/HR		e. MAXIMUM FIRING RATE PER IDENTICAL SOURCE: BTU/HR	

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

*EMISSION INFORMATION				
51. NUMBER OF IDENTICAL SOURCES (DESCRIBE AS REQUIRED):				
AVERAGE OPERATION				
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE			METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	52a. GR/SCF		b. LB/HR	c.
CARBON MONOXIDE	53a. PPM (VOL)		b. LB/HR	c.
NITROGEN OXIDES	54a. PPM (VOL)		b. LB/HR	c.
ORGANIC MATERIAL	55a. PPM (VOL)		b. LB/HR	c.
SULFUR DIOXIDE	56a. PPM (VOL)		b. LB/HR	c.
**OTHER (SPECIFY)	57a. PPM (VOL)		b. LB/HR	c. ***See APC 260***
MAXIMUM OPERATION				
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE			METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	58a. GR/SCF		b. LB/HR	c.
CARBON MONOXIDE	59a. PPM (VOL)		b. LB/HR	c.
NITROGEN OXIDES	60a. PPM (VOL)		b. LB/HR	c.
ORGANIC MATERIAL	61a. PPM (VOL)		b. LB/HR	c.
SULFUR DIOXIDE	62a. PPM (VOL)		b. LB/HR	c.
**OTHER (SPECIFY)	63a. PPM (VOL)		b. LB/HR	c. ***See APC 260***

* ITEMS 52 THROUGH 63 NEED NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

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

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

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

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

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

*DATA AND INFORMATION AIR POLLUTION CONTROL EQUIPMENT	

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

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

INSTRUCTIONS

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

DEFINITIONS

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

ADSORPTION UNIT - ***Not Applicable***	
1. FLOW DIAGRAM DESIGNATION(S) OF ADSORPTION UNIT:	
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
4. ADSORBENT: ☐ ACTIVATED CHARCOAL: TYPE	☐ OTHER: SPECIFY:
5. ADSORBATE(S):	
6. NUMBER OF BEDS PER UNIT:	7. WEIGHT OF ADSORBENT PER BED: LB
8. DIMENSION OF BED: THICKNESS_____ IN, SURFACE AREA _____ SQUARE IN	
9. INLET GAS TEMPERATURE °F	10. PRESSURE DROP ACROSS UNIT: INCH H_2O GAUGE
11. TYPE OF REGENERATION: ☐ REPLACEMENT ☐ STEAM ☐ OTHER: SPECIFY: _____	
12. METHOD OF REGENERATION: ☐ ALTERNATE USE OF _____ ENTIRE UNITS ☐ SOURCE SHUT DOWN ☐ OTHER: DESCRIBE	☐ ALTERNATE USE OF _____ BEDS IN A SINGLE UNIT
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
13. TIME ON LINE BEFORE REGENERATION: MIN/BED	15. TIME ON LINE BEFORE REGENERATION: MIN/BED
14. EFFICIENCY OF ABSORBER (SEE INSTRUCTION 4): %	16. EFFICIENCY OF ABSORBER (SEE INSTRUCTION 4): %

AFTERBURNER - ***Not Applicable***	
1. FLOW DIAGRAM DESIGNATION(S) OF AFTERBURNER:	
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
4. COMBUSTION CHAMBER DIMENSIONS: LENGTH _____ IN, CROSS-SECTIONAL AREA _____ SQUARE IN	
5. INLET GAS TEMPERATURE: °F	7. FUEL ☐ GAS ☐ OIL: SULFUR _____ WT%
6. OPERATING TEMPERATURE OF COMBUSTION CHAMBER: °F	8. BURNERS PER AFTERBURNER: _____ @ _____ BTU/HR EACH
9. CATALYST USED: ☐ NO ☐ YES: DESCRIBE CATALYST _____	
10. HEAT EXCHANGER USED: ☐ NO ☐ YES: DESCRIBE HEAT EXCHANGER _____	
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
11. GAS FLOW RATE: SCFM	13. GAS FLOW RATE: SCFM
12. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): %	14. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): %

CYCLONE - *Not Applicable*	
1. FLOW DIAGRAM DESIGNATION(S) OF CYCLONE:	
2. MANUFACTURER:	3. MODEL:
4. TYPE OF CYCLONE: ☐ SIMPLE ☐ MULTIPLE	5. NUMBER OF CYCLONES IN EACH MULTIPLE CYCLONE:
6. DIMENSION THE APPROPRIATE SKETCH (IN INCHES) OR PROVIDE A DRAWING WITH EQUIVALENT INFORMATION:	

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
7. GAS FLOW RATE: SCFM	9. GAS FLOW RATE: SCFM
8. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4): %	10. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4): %

CONDENSER - *Not Applicable*		
1. FLOW DIAGRAM DESIGNATION(S) OF CONDENSER:		
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:	4. HEAT EXCHANGE AREA: FT^2

AVERAGE OPERATION OF SOURCE		MAXIMUM OPERATION OF SOURCE	
5. COOLANT FLOW RATE PER CONDENSER: WATER _____ GPMAIR _____ SCFM OTHER: TYPE _____, FLOW RATE _____		10. COOLANT FLOW RATE PER CONDENSER: WATER _____ GPMAIR _____ SCFM OTHER: TYPE _____, FLOW RATE _____	
6. GAS FLOW RATE: SCFM		11. GAS FLOW RATE: SCFM	
7. COOLANT TEMPERATURE: INLET _____°F, OUTLET _____°F	8. GAS TEMPERATURE: INLET _____°F, OUTLET _____°F	12. COOLANT TEMPERATURE: INLET _____°F, OUTLET _____°F	13. GAS TEMPERATURE: INLET _____°F, OUTLET _____°F
9. EFFICIENCY OF CONDENSER (SEE INSTRUCTION 4): %		14. EFFICIENCY OF CONDENSER (SEE INSTRUCTION 4): %	

*ELECTRICAL PRECIPITATOR - *Not Applicable*	
1. FLOW DIAGRAM DESIGNATION OF ELECTRICAL PRECIPITATOR:	
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
4. COLLECTING ELECTRODE AREA PER CONTROL DEVICE: FT^2	

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
5. GAS FLOW RATE: SCFM	7. GAS FLOW RATE: SCFM
6. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4): %	8. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4): %
SUBMIT THE MANUFACTURER'S SPECIFICATIONS FOR THE ELECTRICAL PRECIPITATOR. REFERENCE THE INFORMATION TO THIS FORM.	

* ELECTRICAL PRECIPITATORS VARY GREATLY IN THEIR DESIGN AND IN THEIR COMPLEXITY. THE ITEMS IN THIS SECTION PROVIDE A MINIMUM AMOUNT OF INFORMATION. THE APPLICANT MUST, HOWEVER, SUBMIT WITH THIS APPLICATION THE MANUFACTURER'S SPECIFICATIONS, INCLUDING ANY DRAWINGS, TECHNICAL DOCUMENTS, ETC. IF THE INFORMATION PROVIDED BY THE MANUFACTURER'S SPECIFICATIONS IS INSUFFICIENT FOR FULL AND ACCURATE ANALYSIS, THE AGENCY WILL REQUEST SPECIFIC ADDITIONAL INFORMATION.

FILTER UNIT - *Not Applicable*	
1. FLOW DIAGRAM DESIGNATION(S) OF FILTER UNIT:	
2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
4. FILTERING MATERIAL:	5. FILTERING AREA:
6. CLEANING METHOD: ☐ SHAKER ☐ REVERSE AIR ☐ PULSE AIR ☐ PULSE JET ☐ OTHER: SPECIFY	
7. GAS COOLING METHOD: o DUCTWORK: LENGTH _____ FT., DIAM _____ IN. ☐ BLEED-IN AIR ☐ WATER SPRAY ☐ OTHER: SPECIFY	

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
8. GAS FLOW RATE (FROM SOURCE): SCFM	12. GAS FLOW RATE (FROM SOURCE): SCFM
9. GAS COOLING FLOW RATE: ☐ BLEED-IN AIR _____ SCFM, WATER SPRAY _____ GPM	13. GAS COOLING FLOW RATE: ☐ BLEED-IN AIR _____ SCFM, WATER SPRAY _____ GPM
10. INLET GAS CONDITION: TEMPERATURE _____°F, DEWPOINT _____°F	14. INLET GAS CONDITION: TEMPERATURE _____°F, DEWPOINT _____°F
11. EFFICIENCY OF FILTER UNIT (SEE INSTRUCTION 4) %	15. EFFICIENCY OF FILTER UNIT (SEE INSTRUCTION 4): %

SCRUBBER

1. FLOW DIAGRAM DESIGNATION(S) OF SCRUBBER:
Pickling Line Wet Scrubber

2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
PRO-ECO	

4. TYPE OF SCRUBBER:
- ☐ HIGH ENERGY: GAS STREAM PRESSURE DROP _____ INCH H_20
- ☐ PACKED: PACKING TYPE _____, PACKING SIZE _____, PACKED HEIGHT _____ IN.
- ☐ SPRAY: NUMBER OF NOZZLES _____, NOZZLE PRESSURE _____ PSIG
- ☒ OTHER: SPECIFY ***– 4 Sieve Tray -*** ATTACH DESCRIPTION AND SKETCH WITH DIMENSIONS

5. TYPE OF FLOW:
☒ CONCURRENT ☐ COUNTERCURRENT ☐ CROSSFLOW

6. SCRUBBER GEOMETRY:
LENGTH IN DIRECTION OF GAS FLOW ***192*** IN., CROSS-SECTIONAL AREA ***13,824*** SQUARE IN.

7. CHEMICAL COMPOSITION OF SCRUBBANT:
Heavy Duty FRP

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
8. SCRUBBANT FLOW RATE: ***1.5*** GPM	12. SCRUBBANT FLOW RATE: ***2*** GPM
9. GAS FLOW RATE: ***6,446*** SCFM	13. GAS FLOW RATE: ***6,526*** SCFM
10. INLET GAS TEMPERATURE: ***123*** °F	14. INLET GAS TEMPERATURE: ***125*** °F
11. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4): ***99.90 %*** PARTICULATE ***99.90 %*** GASEOUS	15. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4): ***99.90 %*** PARTICULATE ***99.90 %*** GASEOUS

OTHER TYPE OF CONTROL EQUIPMENT - ***Not Applicable***

1. FLOW DIAGRAM DESIGNATION(S) OF "OTHER TYPE" OF CONTROL EQUIPMENT:

2. GENERIC NAME OF "OTHER" EQUIPMENT:	3. MANUFACTURER:	4. MODEL NAME AND NUMBER:

5. DESCRIPTION AND SKETCH, WITH DIMENSIONS AND FLOW RATES, OF "OTHER" EQUIPMENT:

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
6. FLOW RATES: _____ GPM _____ SCFM	8. FLOW RATES: _____ GPM _____ SCFM
7. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): %	9. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): %

EMISSION INFORMATION				
51. NUMBER OF IDENTICAL CONTROL UNITS OR CONTROL SYSTEMS (DESCRIBE AS REQUIRED):				
AVERAGE OPERATION OF SOURCE				
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM			METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	2a.	GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	3a.	PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	4a.	PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	5a.	PPM (VOL)	b. LB/HR	c.
SULFUR DIOXIDE	6a.	PPM (VOL)	b. LB/HR	c.
OTHER (SPECIFY) HCL	7a.	PPM (VOL)	b. *0.229* LB/HR	c. ***Stack Test Data***
MAXIMUM OPERATION OF SOURCE				
CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM			METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	8a.	GR/SCF	b. LB/HR	c.
CARBON MONOXIDE	9a.	PPM (VOL)	b. LB/HR	c.
NITROGEN OXIDES	10a.	PPM (VOL)	b. LB/HR	c.
ORGANIC MATERIAL	11a.	PPM (VOL)	b. LB/HR	c.
SULFUR DIOXIDE	12a.	PPM (VOL)	b. LB/HR	c.
OTHER (SPECIFY) HCL	13a.	PPM (VOL)	b. *0.41* LB/HR	c. ***Emission Factor/Flow Measurements***

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

EXHAUST POINT INFORMATION	
1. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT: ***Pickle Line Scrubber***	
2. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.): ***Vertical Stack***	
3. EXIT HEIGHT ABOVE GRADE: ***70*** FT	4. EXIT DIAMETER: ***1.25***
5. GREATEST HEIGHT OF NEARBY BUILDINGS: ***42*** FT	6. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: ***250*** FT
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
7. EXIT GAS TEMPERATURE: ***123*** °F	9. EXIT GAS TEMPERATURE ***125*** °F
8. GAS FLOW RATE THROUGH EACH EXIT: ***5,540*** ACFM	10. GAS FLOW RATE THROUGH EACH EXIT: ***5,710*** ACFM

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

Maximum Operation Rate

Current Permitted Emission Factor (Scrubber Control) = **4.8 lbs HCL/1000 tons Steel Processed**
Testing w/ Scrubber Control)
Proposed Annual Steel Throughput = **750,000 tons/year**

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

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

Actual Tested Operation Rate

HCL Emission Rate per 2002 Stack Test Data = **0.229 lbs/hour**

Test Rate Production = 200 tons steel / 3 hours = **67 tons steel/hour**
HCL Emitted per Ton Steel = (0.229 lbs/hr) / (67 tons steel/hr) = **0.0034 lbs HCl emitted/ton steel**

Emission Calculation
0.0034 lb HCl/ton steel * (750,000 tons steel/yr) = **2,550 lbs HCl/yr or 1.275 tons/yr**

* Average throughput based on 2003 and 2004 thruputs

Actual Emissions With Control

HCl Emission Rate per 2002 Stack Test Data = **0.229 lbs/hr**
Test Rate Production = 200 tons steel / 3 hours = **67 tons steel/hr**
0.229 lbs/hr / 67 tons steel = **0.0034 lbs HCl emitted/ton steel**
0.0034 lb HCL/ton steel * 1000 lbs/steel = **3.4 lb/1000 lb steel**
0.0034 lbs HCL/ton steel * 750,000 tons steel/yr / 2000 lbs/ton = **1.28 tons HCl/yr**

Potential To Emit With Control

Permited Emission Factor = 4.8 lbs/1000 tons steel
Production = 750,000 tons
Potential to emit = (4.8 lb / 1000 tons) * 750,000 tons/yr * (1/2000 lbs/ton) = **1.8 tons/yr**

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

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

217/782-2113 CERTIFIED MAIL

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 tons/hr x 8,760 hr/yr = 292,000 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.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

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

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

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

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

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

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

DES:VJB:jar

cc: Region 1

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

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

October 18, 2005

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

RE: FESOP Application
NACME Steel Processing
ID No. 031600FWL

Dear Mr. Sutton:

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

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

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

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

Regards,

NACME STEEL PROCESSING

Willam Reichel
Production Manager

pc: J. DuBrock, National Materials

RENEWAL APPLICATION – FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

Prepared For
NACME STEEL PROCESSING

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

October 18, 2005

RENEWAL APPLICATION – FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

Prepared For

NACME STEEL PROCESSING

On the Property Commonly Known As

429 West 127th Street

Chicago, Illinois

October 18, 2005

MOSTARDI PLATT PROJECT M046005 (2005)

TABLE OF CONTENTS

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

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

APPLICATION FOR CAAPP PERMIT

(CHECK ONLY ONE)

- ☐ INITIAL APPLICATION
- ☒ RENEWAL APPLICATION
- ☐ SIGNIFICANT MODIFICATION

FOR AGENCY USE ONLY
ID NUMBER:
PERMIT #:
DATE:

SOURCE INFORMATION

1) SOURCE NAME: ***NACME Steel Processing***		2) DATE FORM COMPLETED: ***September 30, 2005***
3) SOURCE STREET ADDRESS: ***429 West 127th Street***		
4) CITY: ***Chicago***		5) ZIP: ***60628***
6) IS THE SOURCE LOCATED WITHIN CITY LIMITS?		☒ YES ☐ NO
7) TOWNSHIP NAME:	8) COUNTY: ***Cook***	9) TYPICAL NO. OF EMPLOYEES AT THE SOURCE: ***50***
10) ILLINOIS AIR POLLUTION SOURCE ID NO. (IF KNOWN): ***031600FWL***		11) FEDERAL EMPLOYER IDENTIFICATION NO. (FEIN):
12) TYPE OF SOURCE AND PRODUCTS PRODUCED: ***Steel Pickling***		
13) PRIMARY STANDARD INDUSTRIAL CLASSIFICATION (SIC) CATEGORY: ***41.66***		14) PRIMARY SIC NO.:
15a) LATITUDE (DD:MM:SS):	b) LONGITUDE (DD:MM:SS): ***87.63***	
16a) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):
17a) COORDINATE METHOD:	b) REFERENCE LOCATION:	c) COORDINATE ACCURACY:
18) SOURCE ENVIRONMENTAL CONTACT PERSON: ***William Reichel***	19) CONTACT PERSON'S TELEPHONE NO.: ***773-291-1303***	

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

FOR APPLICANT'S USE

OWNER INFORMATION		
20) NAME: *National Material, L.P.*		
21) ADDRESS: *1965 Pratt Boulevard*		
22) CITY: *Elk Grove Village*	23) STATE: *Illinois*	24) ZIP: *60007*
25) OWNER'S AGENT (IF APPLICABLE):		

OPERATOR INFORMATION		
26) NAME: *NACME Steel Processing*		
27) ADDRESS: *429 West 127th Street*		
28) CITY: *Chicago*	29) STATE: *Illinois*	30) ZIP: *60628*

BILLING INFORMATION		
31) NAME: *NACME Steel Processing*		
32) ADDRESS: *429 West 127th Street*		
33) CITY: *Chicago*	34) STATE: *Illinois*	35) ZIP: *60628*
36) CONTACT PERSON: *William Reichel*	37) CONTACT PERSON'S TELEPHONE NO.: *773-291-1303*	

APPLICANT INFORMATION	
38) WHO IS THE PERMIT APPLICANT? (CHECK ONE): ☐ OWNER ☒ OPERATOR	39) ALL CORRESPONDENCE TO: (CHECK ONE) ☐ OWNER ☐ SOURCE ☒ OPERATOR
40) ATTENTION NAME AND/OR TITLE FOR WRITTEN CORRESPONDENCE: *William Reichel, Production Manager*	
41) TECHNICAL CONTACT PERSON FOR APPLICATION: *Karyn Andersen*	42) CONTACT PERSON'S TELEPHONE NO.: *630-993-2680*

SUMMARY OF APPLICATION CONTENTS		
NOTE: ITEMS 43 TO 61 WILL BE USED FOR APPLICATION COMPLETENESS DETERMINATION.		
43) DOES THE APPLICATION INCLUDE A TABLE OF CONTENTS?	☒ YES	☐ NO
44) DOES THE APPLICATION INCLUDE A LIST OF ALL ITEMS AND ACTIVITIES FOR WHICH A PERMIT IS BEING SOUGHT?	☒ YES	☐ NO
45) DOES THE APPLICATION INCLUDE A PLOT PLAN AND/OR MAP DEPICTING THE AREA WITHIN ONE-QUARTER MILE OF THE SOURCE?	☒ YES	☐ NO
46) DOES THE APPLICATION INCLUDE A PROCESS FLOW DIAGRAM(S) SHOWING ALL EMISSION UNITS AND CONTROL EQUIPMENT, AND THEIR RELATIONSHIP?	☒ YES	☐ NO
47) DOES THE APPLICATION INCLUDE A COMPLETE PROCESS DESCRIPTION FOR THE SOURCE?	☒ YES	☐ NO
48a) DOES THE APPLICATION INCLUDE THE APPROPRIATE, COMPLETED FORMS FOR ALL INDIVIDUAL EMISSION UNITS AND AIR POLLUTION CONTROL EQUIPMENT, LISTING ALL APPLICABLE REQUIREMENTS AND PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE REQUIREMENTS?	☒ YES	☐ NO
b) DOES THE APPLICATION ADDRESS OTHER MODES OF OPERATION FOR WHICH A PERMIT IS BEING SOUGHT?	☒ *NA ☐ YES ☐ NO *NOTE: NOT APPLICABLE	
c) DOES THE APPLICATION INCLUDE ALL REASONABLY ANTICIPATED OPERATING SCENARIOS FOR WHICH A PERMIT IS BEING SOUGHT?	☐ *NA ☒ YES ☐ NO *NOTE: NOT APPLICABLE	
49) DOES THE APPLICATION INCLUDE A COMPLETED "FUGITIVE EMISSION" FORM 391-CAAPP?	☒ YES	☐ NO
50) DOES THE APPLICATION INCLUDE A COMPLETED "FEE DETERMINATION FOR CAAPP PERMIT" FORM 292-CAAPP? (NOTE: FEES WILL BE BASED UPON INFORMATION CONTAINED IN THIS FORM.)	☒ YES	☐ NO
51) DOES THE APPLICATION INCLUDE A COMPLETED "HAZARDOUS AIR POLLUTANT EMISSION SUMMARY" FORM 215-CAAPP?	☒ YES	☐ NO
52) DOES THE APPLICATION INCLUDE THE CALCULATIONS ON WHICH THE FOLLOWING, TO THE EXTENT THEY ARE RELATED TO AIR EMISSIONS, WERE BASED: • POLLUTANT EMISSION RATES, • FUELS AND RAW MATERIALS USAGE, AND • CONTROL EQUIPMENT EFFICIENCY?	☒ YES	☐ NO
53) DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT" FORM 293-CAAPP?	☒ YES	☐ NO
54) DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE CERTIFICATION" FORM 296-CAAPP?	☒ YES	☐ NO
55) DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE-ADDENDUM FOR NONCOMPLYING EMISSION UNITS" FORM 294-CAAPP FOR ONE OR MORE NONCOMPLIANT EMISSION UNITS FOR WHICH ISSUANCE OF A CAAPP PERMIT IS REQUESTED?	☒ *NA ☐ YES ☐ NO *NOTE: NOT APPLICABLE	

56)	HAS THE APPLICANT RETAINED A COPY OF THIS APPLICATION AT THE SOURCE? (NOTE: IF TRADE SECRET INFORMATION IS NOT BEING SUBMITTED, THEN ONLY THE ORIGINAL APPLICATION NEED BE INITIALLY SUBMITTED. HOWEVER, THE ILLINOIS EPA MAY REQUEST UP TO 4 COPIES OF THE FINAL APPLICATION PRIOR TO PUBLIC NOTICE.)	☒ YES ☐ NO
57a)	DOES THE APPLICATION CONTAIN TRADE SECRET INFORMATION?	☐ YES ☒ NO
b)	IF YES, HAS SUCH INFORMATION BEEN PROPERLY MARKED AND CLAIMED, AND TWO SEPARATE COPIES OF THE APPLICATION SUITABLE FOR PUBLIC INSPECTION BEEN SUBMITTED, IN ACCORDANCE WITH APPLICABLE REGULATIONS?	☐ YES ☐ NO
58)	DOES THE APPLICATION INCLUDE AN EARLY REDUCTION DEMONSTRATION FOR HAZARDOUS AIR POLLUTANTS (HAP) PURSUANT TO SECTION 112(i)(5) OF THE CLEAN AIR ACT AS AMENDED IN 1990?	☒ *NA ☐ YES ☐ NO *NOTE: NOT APPLICABLE
59)	DOES THE APPLICATION INCLUDE A PROPOSED DETERMINATION OF MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT) FOR HAZARDOUS AIR POLLUTANTS PURSUANT TO SECTION 112 OF THE CLEAN AIR ACT AS AMENDED IN 1990?	☒ *NA ☐ YES ☐ NO *NOTE: NOT APPLICABLE
60)	HAS THE APPLICANT REGISTERED A RISK MANAGEMENT PROGRAM FOR ACCIDENTAL RELEASES PURSUANT TO SECTION 112(r) OF THE CLEAN AIR ACT AS AMENDED IN 1990 OR INTENDS TO COMPLY WITH THIS REQUIREMENT IN ACCORDANCE WITH ITS COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE?	☒ *NA ☐ YES ☐ NO *NOTE: NOT APPLICABLE
61a)	FOR CAAPP PERMIT RENEWALS, DOES THE APPLICATION INCLUDE A COMPLIANCE ASSURANCE MONITORING PLAN (FORM 464-CAAPP) PURSUANT TO 40 CFR PART 64?	☒ *NA ☐ YES ☐ NO *NOTE: NOT APPLICABLE
b)	FOR SIGNIFICANT MODIFICATIONS AND INITIAL CAAPP APPLICATION SUBMITTED AFTER APRIL 20, 1998, DOES THE APPLICATION INCLUDE A COMPLIANCE ASSURANCE MONITORING PLAN (FORM 464-CAAPP) PURSUANT TO 40 CFR PART 64 FOR THE EMISSION UNITS WITH POST-CONTROL EMISSIONS GREATER THAN OR EQUAL TO THE MAJOR SOURCE THRESHOLD?	☒ *NA ☐ YES ☐ NO *NOTE: NOT APPLICABLE
62)	FOR SIGNIFICANT MODIFICATIONS, DOES THE APPLICATION INCLUDE A DESCRIPTION OF THE PROPOSED CHANGE(S), INCLUDING ALL PHYSICAL CHANGES IN EQUIPMENT, CHANGES IN THE METHOD OF OPERATION, CHANGES IN EMISSIONS, AND ANY NEW APPLICABLE REQUIREMENTS WHICH WILL APPLY AS A RESULT OF THE PROPOSED CHANGE?	☐ YES ☐ NO

NOTE: ANSWERING "NO" TO ANY OF THE ABOVE (ITEMS 43-62, EXCEPT ITEM 57a) MAY RESULT IN THE APPLICATION BEING DEEMED INCOMPLETE.

63)	DOES THE APPLICATION REQUEST TO UTILIZE THE OPERATIONAL FLEXIBILITY PROVISIONS AND INCLUDE THE INFORMATION REQUIRED FOR SUCH USE?	☐ YES ☒ NO
64a)	DOES THE APPLICANT HEREBY REQUEST A PERMIT SHIELD FOR THE ENTIRE SOURCE?	☒ YES ☐ NO
b)	IF NO, DOES THE APPLICATION CONTAIN A REQUEST FOR A PERMIT SHIELD FOR SPECIFIC ITEMS ONLY, IN ACCORDANCE WITH THE INSTRUCTIONS FOR A CAAPP PERMIT?	☐ YES ☐ NO
65)	DOES THE APPLICATION INCLUDE A COMPLETED "LISTING OF INSIGNIFICANT ACTIVITIES" FORM 297-CAAPP?	☒ YES ☐ NO
66)	DOES THE APPLICATION INCLUDE A DRAWING PROVIDING THE SOURCE LAYOUT? IF NO, PLEASE NOTE THAT THE AGENCY MAY REQUEST SUCH A DRAWING UPON DETAILED REVIEW OF THE APPLICATION.	☐ YES ☒ NO

67) WHY IS THE APPLICANT APPLYING FOR A CAAPP PERMIT (CHECK ALL THAT APPLY)?

☐ THE POTENTIAL TO EMIT ONE OR MORE AIR POLLUTANTS FOR THE SOURCE IS 100 TONS/YEAR OR GREATER.

☐ THE SOURCE IS AN AFFECTED SOURCE FOR ACID RAIN DEPOSITION.

☐ THE POTENTIAL TO EMIT VOM OR NOx IS 25 TONS/YEAR OR MORE AND THE SOURCE IS LOCATED IN ONE OF THE FOLLOWING CHICAGO AREA COUNTIES OR TOWNSHIPS:

- COOK COUNTY
- DUPAGE COUNTY
- KANE COUNTY
- LAKE COUNTY
- McHENRY COUNTY
- WILL COUNTY
- AUX SABLE TOWNSHIP, GRUNDY COUNTY
- GOOSE LAKE TOWNSHIP, GRUNDY COUNTY
- OSWEGO TOWNSHIP, KENDALL COUNTY

NOTE: THE U.S. EPA HAS APPROVED AN EXEMPTION ON NITROGEN OXIDES (NOx) EMISSIONS AS AN OZONE PRECURSOR IN THE CHICAGO OZONE NON-ATTAINMENT AREA. THEREFORE THE MAJOR SOURCE THRESHOLD FOR NOx EMISSIONS IS 100 TONS/YEAR UNTIL THIS EXEMPTION IS NO LONGER EFFECTIVE. SHOULD THE CURRENT NOx EXEMPTION BE NO LONGER EFFECTIVE, THE MAJOR SOURCE THRESHOLD FOR NO_x EMISSIONS WILL BE 25 TONS/YEAR IN THE ABOVE CHICAGO AREA COUNTIES AND TOWNSHIPS.

☒ THE POTENTIAL TO EMIT AN INDIVIDUAL HAZARDOUS AIR POLLUTANT IS 10 TONS/YEAR OR MORE, OR THE POTENTIAL TO EMIT ALL SOURCE WIDE HAZARDOUS AIR POLLUTANTS IS 25 TONS/YEAR OR MORE, OR MEETS AN APPLICABLE LOWER THRESHOLD.

☒ THE SOURCE CONTAINS EQUIPMENT OR OPERATIONS SUBJECT TO CERTAIN USEPA EMISSION STANDARDS (NSPS AND NESHAP) FOR WHICH USEPA REQUIRES A CAAPP PERMIT.

68a) ARE ACTUAL EMISSIONS OF THE SOURCE BELOW THE APPLICABILITY LEVELS FOR A CAAPP PERMIT? ☒ YES ☐ NO

b) DOES THE APPLICATION CONTAIN PROPOSED PERMIT LIMITATIONS THAT WILL CONSTRAIN THE EMISSIONS AND PRODUCTION OR OPERATION OF THE SOURCE SUCH THAT POTENTIAL EMISSIONS OF THE SOURCE WILL FALL BELOW THE LEVELS FOR WHICH A CAAPP PERMIT IS REQUIRED? ☒ YES ☐ NO

c) DOES THE APPLICANT HEREBY REQUEST A FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CONSTRAINING THE EMISSIONS AND PRODUCTION OR OPERATION OF THE SOURCE SUCH THAT POTENTIAL EMISSIONS WOULD FALL BELOW APPLICABILITY LEVELS AND THEREBY EXCLUDE THE SOURCE FROM REQUIRING A CAAPP PERMIT? ☒ YES ☐ NO

SIGNATURE BLOCK

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE RETURNED AS INCOMPLETE.

69) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE.

AUTHORIZED SIGNATURE:

BY: _____ (AUTHORIZED SIGNATURE) *Production Manager* (TITLE OF SIGNATORY)

William Reichel (TYPED OR PRINTED NAME OF SIGNATORY) / / (DATE)

EXHIBIT 200-1 PROCESS DESCRIPTION

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

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

EXHIBIT 200-2
SITE LOCATION MAP – NACME STEEL PROCESSING

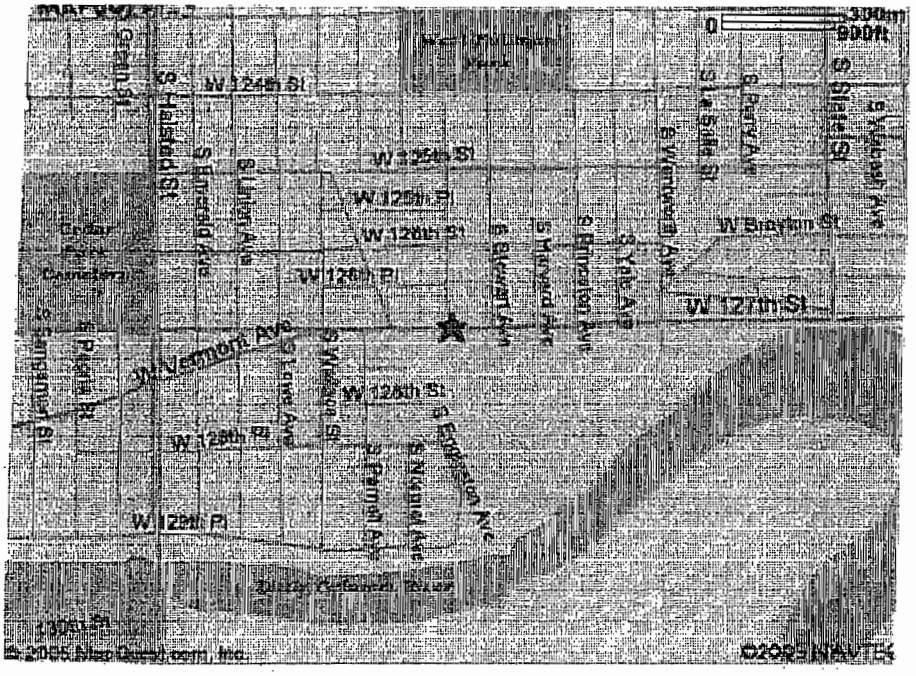


EXHIBIT 200-3 FACILITY DIAGRAM

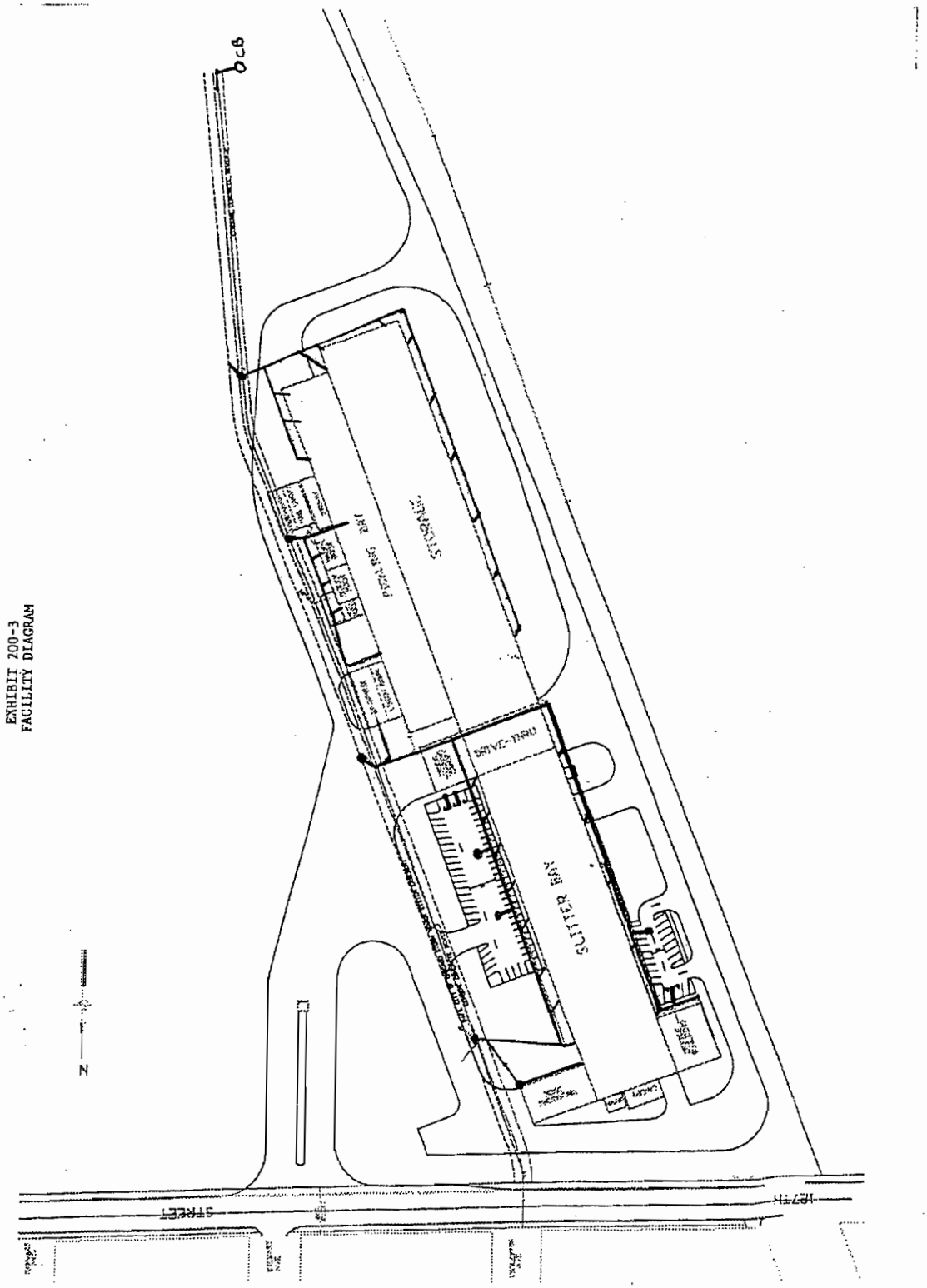


EXHIBIT 200-4 LIST OF INSIGNIFICANT ACTIVITIES

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

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

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

PROCESS EMISSION UNIT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	EMISSION POINT #:
	DATE:

SOURCE INFORMATION

1) SOURCE NAME:
NACME Steel Processing

2) DATE FORM PREPARED:	3) SOURCE ID NO. (IF KNOWN):
9/30/05	***031600FWL***

GENERAL INFORMATION

4) NAME OF EMISSION UNIT:
Steel Pickling Line

5) NAME OF PROCESS:
Steel Pickling

6) DESCRIPTION OF PROCESS:
Pickling of Steel Coils using a diluted HCl solution

7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR ACTIVITY ACCOMPLISHED:
Pickled Steel with Non-VOM Rust Preventative Lubricant

8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT:
Stell Pickling Line

9) MANUFACTURER OF EMISSION UNIT (IF KNOWN):

10) MODEL NUMBER (IF KNOWN):	11) SERIAL NUMBER (IF KNOWN):
12) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):

13) DESCRIPTION OF MODIFICATION (IF APPLICABLE):

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

FOR APPLICANT'S USE
_____

14) DOES THE EMISSION UNIT HAVE MORE THAN ONE MODE OF OPERATION? ☐ YES ☒ NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE PROCESS EMISSION UNIT FORM 220-CAAPP MUST BE COMPLETED FOR EACH MODE):

15) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS EMISSION UNIT, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):

Emission Scrubber

16) WILL EMISSIONS DURING STARTUP EXCEED EITHER THE ALLOWABLE EMISSION RATE PURSUANT TO A SPECIFIC RULE, OR THE ALLOWABLE EMISSION LIMIT AS ESTABLISHED BY AN EXISTING OR PROPOSED PERMIT CONDITION? ☐ YES ☒ NO

IF YES, COMPLETE AND ATTACH FORM 203-CAAPP, "REQUEST TO OPERATE WITH EXCESS EMISSIONS DURING STARTUP OF EQUIPMENT".

17) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., ONLY ONE UNIT IS OPERATED AT A TIME):

Line Speed

OPERATING INFORMATION

18) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE FOLLOWING OPERATING INFORMATION, MATERIAL USAGE INFORMATION AND FUEL USAGE DATA WERE BASED AND LABEL AS EXHIBIT 220-1. REFER TO SPECIAL NOTES OF FORM 202-CAAPP.

19a) MAXIMUM OPERATING HOURS	HOURS/DAY:	DAYS/WEEK:	WEEKS/YEAR:	
7,488	*24*	*6*	*52*	
b) TYPICAL OPERATING HOURS	HOURS/DAY:	DAYS/WEEK:	WEEKS/YEAR:	
6,240	*24*	*5*	*52*	
20) ANNUAL THROUGHPUT	DEC-FEB(%):	MAR-MAY(%):	JUN-AUG(%):	SEP-NOV(%):
	25	*25*	*25*	*25*

MATERIAL USAGE INFORMATION

	MAXIMUM RATES		TYPICAL RATES	
21a) RAW MATERIALS	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
Steel Coils	*77,990*	*292,000*	*77,990*	*292,000*
HCl Solution	*1,150*	*4,303*	*1,150*	*4,303*
Water	*1,303*	*4,881*	*1,303*	*4,881*
Coating Oil	*1.2*	*4.5*	*1.2*	*4.5*

21b) PRODUCTS	MAXIMUM RATES LBS/HR	MAXIMUM RATES TONS/YEAR	TYPICAL RATES LBS/HR	TYPICAL RATES TONS/YEAR
Unscaled Steel Coils	*77,990*	*292,000*	*77,990*	*292,000*

21c) BY-PRODUCT MATERIALS	MAXIMUM RATES LBS/HR	MAXIMUM RATES TONS/YEAR	TYPICAL RATES LBS/HR	TYPICAL RATES TONS/YEAR
Scrap Steel	*Various*	*Various*	*Various*	*Various*
Spent Ferrous Chloride	*Various*	*Various*	*Various*	*Various*
Water	*Various*	*Various*	*Various*	*Various*

FUEL USAGE DATA – Not Applicable (Steam Heat)

22a) MAXIMUM FIRING RATE (MILLION BTU/HR):	b) TYPICAL FIRING RATE (MILLION BTU/HR):	c) DESIGN CAPACITY FIRING RATE (MILLION BTU/HR):

☐ NATURAL GAS ☐ FUEL OIL: GRADE NUMBER_____ ☐ COAL ☐ OTHER

IF MORE THAN ONE FUEL IS USED, ATTACH AN EXPLANATION AND LABEL AS EXHIBIT 220-2.

e) TYPICAL HEAT CONTENT OF FUEL (BTU/LB, BTU/GAL OR BTU/SCF):	f) TYPICAL SULFUR CONTENT (WT %., NA FOR NATURAL GAS):
g) TYPICAL ASH CONTENT (WT %., NA FOR NATURAL GAS):	h) ANNUAL FUEL USAGE (SPECIFY UNITS, E.G., SCF/YEAR, GAL/YEAR, TON/YEAR):

23) ARE COMBUSTION EMISSIONS DUCTED TO THE SAME STACK OR CONTROL AS PROCESS UNIT EMISSIONS? ☐ YES ☐ NO

IF NO, IDENTIFY THE EXHAUST POINT FOR COMBUSTION EMISSIONS:

APPLICABLE RULES

24) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.204(j)(4), 3.5 LBS/GAL):

REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
HCl	40 CFR 63, Subpart CCC	No HCl in a concentration in excess of 18 ppmv or mass emission rate that corresponds to a collection efficiency of less than 97

25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
HCl	35 IAC 201.301	Compliance Records
HCl	40 CFR 63. 1160	Operations and Maintenance Plan/Inspection Records
HCl	40 CFR 63.10	Relevant Records

26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
HCl	35 IAC 201.302	Annual Reporting/Compliance Notification
HCl	40 CFR 63.89(e)(3)	Testing Notification and Methods

27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
HCl	201.281	Emission Source/Device Monitoring
HCl	40 CFR 63.1160	Pressure Drop Across Scrubber (Once Per Shift)
HCl	40 CFR 63.1162	Scrubber Water Flow

28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)
HCl	35 IAC 201.282/40 CFR 63.1161 and 1162	Emission Testing, As Required
HCl	40 CFR 63.7 and 63.8(e)(4)	Emission Testing to Establish Compliance with Relevant Limit

NMLP 0287

29) DOES THE EMISSION UNIT QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE? ☐ YES ☒ NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 220-3, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

COMPLIANCE INFORMATION

30) IS THE EMISSION UNIT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE – ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

31) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Emission Testing – Control Device Exhaust per 63.1161 and maintenance of Coating Oil MSDS.

32) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Maintenance of scrubber water/air flow, acid bath temperature, steel throughput, emission source/control device maintenance records, and coating oil MSDS.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

33a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Scrubber Water Flow	*Gallons*	*Flow meter*	*Monitored Continuous/ Recorded Once Per Shift*
Steel Throughput	*Tons*	*Throughput Logs*	*Monthly*
Acid Bath Temp	*Degrees*	*Temperature Monitor*	*Continuous*

33b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Scrubber Water Flow	*Flow Log*	*Shift Operator*	*Production Manager*
Steel Throughput	*Throughput Log*	*Production Manager*	*Production Manager*
Acid Bath Temp	*Temperature Log*	*Pickle Line Operator*	*Production Manager*

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? ☒ YES ☐ NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND SUBMITTAL TO THE AGENCY UPON REQUEST? ☒ YES ☐ NO

IF NO, EXPLAIN:

34a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Scrubber water flow

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., VOM EMISSIONS TO ATMOSPHERE)?

Flow of water to scrubber

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., IN STACK MONITOR 3 FEET FROM EXIT):

Adjacent to scrubber

34d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? ☐ YES ☒ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

Scrubber flow meter

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? ☐ YES ☒ NO

IF NO, EXPLAIN:

Calibrated in accordance with manufacturer's specifications

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED EMISSION UNIT IS IN OPERATION? ☒ YES ☐ NO

IF NO, EXPLAIN:

35) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 220-4:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
April 2002	*Methods 104 and 26A*	*GE Mostardi Platt*	*Typical Conditions*	*0.217 lbs HCl/hr (6.87 ppm)*

36) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Annual Emission Reporting	*Annual Emission Report*	*Annually*
Testing Notifications	*Test Notification/Protocol*	*As Required*

(37)EMISSION INFORMATION

REGULATED AIR POLLUTANT		☐ [1]ACTUAL EMISSION RATE ☒ [1]UNCONTROLLED EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			[2]PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[3]OTHER TERMS	[4]DM	[5]RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						( )				
	TYPICAL:						( )				
LEAD	MAXIMUM:						( )				
	TYPICAL:						( )				
NITROGEN OXIDES (NOx)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER (PART)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						( )				
	TYPICAL:						( )				
SULFUR DIOXIDE (SO2)	MAXIMUM:						( )				
	TYPICAL:						( )				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						( )				
	TYPICAL:						( )				
OTHER, SPECIFY:	MAXIMUM:	*4.34*	*19*			*5*	*18 (ppm)*	*40 CFR 63.1157*	*10*	*0.0065 lbs HCl/Ton Steel*	*0.951 tpy*
HCl	TYPICAL:	*4.34*	*19*			*5*	( )				
EXAMPLE PARTICULATE MATTER	MAXIMUM:	*5.00*	*21.9*	*0.3 GR/DSCF*		*1*	*6.0 (LBS/HR)*	*212.321*	*26.28*	*5.5 LBS/HR*	*22*
	TYPICAL:	*4.00*	*14.4*	*0.24 GR/DSCF*		*4*	*5.5 (LBS/HR)*	*212.321*	*19.80*		

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

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

(38) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		☐ [1]ACTUAL EMISSION RATE ☒ [1]UNCONTROLLED EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	[2]CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[4]DM	[5]RATE OR STANDARD	APPLICABLE RULE
HCl	*7467-01-0*	MAXIMUM:	*4.34*	*19*		*5*	*18 ppmv*	*40 CFR 63.1157*
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE:		MAXIMUM:	*10.0*	*12*		*2*	*98% by wt control device*	*CFR 61*
Benzene	*71432*	TYPICAL:	*8.0*	*0.8*		*2*	*leak-tight trucks*	*61.302(b),(d)*

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

[1]PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.
[2]CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
[5]RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

NMLP 0292

EXHAUST POINT INFORMATION		
THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.		
39) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT: ***N/A – Exhausts through a scrubber***		
40) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.		
41) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):		
42) DISCHARGE HEIGHT ABOVE GRADE (FT):		
43) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):		
44) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.		
45) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
46) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):
47) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):		

48) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

NAME	FLOW DIAGRAM DESIGNATION
a)	
b)	
c)	
d)	
e)	

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.		
49a) LATITUDE:	b) LONGITUDE:	
50) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):

EXHIBIT 220-1 COATING OIL MSDS

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CORFILM 333

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

Revision Date: November 20, 2000

MATERIAL SAFETY DATA SHEET

HMIS RATING			*0 = Insignificant*
	HEALTH	*1*	*1 = Slight*
	FLAMMABILITY	*1*	*2 = Moderate*
	REACTIVITY	*0*	*3 = High*
	PERSONAL PROTECTION	*C*	*4 = Extreme*

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

SECTION I: PRODUCT INFORMATION

TRADE NAME: CORFILM 333
CHEMICAL NAME:
SYNONYMS:
CHEMICAL FAMILY: Rust preventive

SECTION II: HAZARDOUS INGREDIENTS

HAZARD COMPONENTS:	CAS #	HAZARD DATA
Barium sulfonate* <1.3%	61790-48-5	10 mg (Ba)/M^3 ACGIH TLV 15 mg (Ba)/M^3 OSHA PEL (Total Dust) 10 mg (Ba)/M^3 OSHA PEL (Respirable Fraction)
Solvent refined light Paraffinic distillate	64741-89-5 and/or 64741-97-5	5 mg/M^3 ACGIH LLV 5 mg/M^3 OSHA PEL
Hydrotreated light Paraffinic or napthenic distillate	64742-55-9 and/or 64742-53-6	

*Chemical reported under Sect. 313, SARA Title III

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CORFILM 333

SECTION III: FIRST AID PRECAUTIONARY INFORMATION

ALWAYS HAVE PLENTY OF WATER AVAILABLE FOR FIRST AID

SKIN: Immediately flush skin with plenty of water for at least 15 minutes. Wash with soap and water.

EYES: Immediately flush with plenty of water for at least 15 minutes; ensure water flushing of entire surface of eye and lid. ***Obtain medical attention at once.***

INHALATION: Remove to fresh air.

INGESTION: If more than a half cup of material is swallowed, give several glasses of water to drink, then induce vomiting. ***Obtain medical attention.*** Never give anything by mouth to an unconscious person. *NOTE: IARC has not found severely hydro treated oils to be carcinogenic.*

Remove contaminated clothing promptly. Launder clothing before re-use; discard shoes.

SECTION IV: OVEREXPOSURE EFFECTS

SKIN: May cause irritation.

EYES: May cause irritation.

INHALATION: Vaporization is not expected at ambient temperature. Breathing mist will cause coughing, irritation of nose and throat.

INGESTION: May cause irritation.

SECTION V: PERSONAL PROTECTION

RESPIRATORY PROTECTION: NIOSH-approved respirator for mists.

VENTILATION: Mechanical (general or local exhaust)

PROTECTIVE GLOVES: Impervious

EYE PROTECTION:	Chemical goggles or face shield. Do not wear contact lenses.
PROTECTIVE EQUIPMENT:	Apron or protective clothing.
HANDLING AND STORAGE:	Keep container tightly closed. Store in cool, dry location. Keep from freezing.

SECTION VI: PHYSICAL DATA AND CHEMICAL PROPERTIES

BOILING POINT (°F):	>459°F
FREEZING POINT (°F):	N/A
VOLATILITY/VOL (%):	Negligible
VAPOR PRESSURE (mm Hg):	0.1 at 70° F
VAPOR DENSITY (Air =1):	>10
SOLUBILITY IN H_2O:	Negligible
APPEARANCE/ODOR:	Clear, amber liquid; mild petroleum odor
SPECIFIC GRAVITY (H_20 =1):	0.902
EVAPORATION RATE:	Negligible
pH:	N/A

SECTION VII: FIRE AND EXPLOSION HAZARD DATA

FLASH POINT:	>300° F (C.O.C.)
LOWER FLAME LIMIT:	N/A
HIGHER FLAME LIMIT:	N/A
EXTINGUISHING MEDIA:	Dry chemical, carbon dioxide, foam, water fog; foam and water spray are effective, but may cause frothing.
FOR FIRE:	Wear self-contained breathing apparatus with full face piece, operated in pressure demand or other positive pressure mode to protect against the hazardous effects of combustion products and oxygen deficiencies. Use water spray to cool fire-exposed containers to prevent rupture. Avoid spreading burning liquid with water used for cooling.

UNUSUAL FIRE HAZARD: Burning liquid will float on water. Notify appropriate authorities if liquid enters sewers/waterways.

SECTION VIII: REACTIVITY DATA

CHEMICAL STABILITY: Stable

CONDITIONS TO AVOID: Storage temperature above 200° F

INCOMPATIBLE MATERIALS: Strong alkalis, strong oxidizing agents, strong acids, sources of ignition.

DECOMPOSITION PRODUCTS: Carbon dioxide, carbon monoxide, oxides of sulfur and nitrogen and barium.

HAZARDOUS POLYMERIZATION: Will not occur.

SECTION IX: SPILL AND DISPOSAL PROCEDURE

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

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

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

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CORFILM 333

SECTION X: TRANSPORTATION INFORMATION

HAZARD CLASS:	Not regulated
DOT SHIPPING NAME:	N/A
REPORTABLE QUANTITY (RQ):	N/A
UN NUMBER:	N/A
NA NUMBER:	N/A

SECTION XI: TSCA INFORMATION

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

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

Prepared by: J. D. Pemberton
Quality Assurance Manager

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

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

FUEL COMBUSTION EMISSION UNIT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	EMISSION POINT #:
	DATE:

SOURCE INFORMATION	
1) SOURCE NAME:	
2) DATE FORM PREPARED:	3) SOURCE ID NO. (IF KNOWN):

GENERAL INFORMATION	
4) NAME OF EMISSION UNIT: ***Boilers 1 and 2 (Boiler 2 for Steam Heat)***	
5) NAME OF PROCESS: ***Boiler***	
6) DESCRIPTION OF PROCESS: ***For Comfort and steam heat***	
7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR ACTIVITY ACCOMPLISHED: ***Heat and steam***	
8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT: ***Boilers 1 and 2***	
9) MANUFACTURER OF EMISSION UNIT (IF KNOWN):	
10) MODEL NUMBER (IF KNOWN):	11) SERIAL NUMBER (IF KNOWN):
12) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):
13) DESCRIPTION OF MODIFICATION (IF APPLICABLE): ***N/A***	

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

FOR APPLICANT'S USE
_____

14) DOES THE EMISSION UNIT HAVE MORE THAN ONE MODE OF OPERATION? ☐ YES ☒ NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE PROCESS EMISSION UNIT FORM 240-CAAPP MUST BE COMPLETED FOR EACH MODE):

15) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS EMISSION UNIT, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):

N/A

16) WILL EMISSIONS DURING STARTUP EXCEED EITHER THE ALLOWABLE EMISSION RATE PURSUANT TO A SPECIFIC RULE, OR THE ALLOWABLE EMISSION LIMIT AS ESTABLISHED BY AN EXISTING OR PROPOSED PERMIT CONDITION? ☐ YES ☒ NO

IF YES, COMPLETE AND ATTACH FORM 203-CAAPP, "REQUEST TO OPERATE WITH EXCESS EMISSIONS DURING STARTUP OF EQUIPMENT".

17) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., ONLY ONE UNIT IS OPERATED AT A TIME):

Firing Rate

OPERATING INFORMATION

18) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE FOLLOWING OPERATING INFORMATION, MATERIAL USAGE INFORMATION AND FUEL USAGE DATA WERE BASED AND LABEL AS EXHIBIT 240-1. REFER TO SPECIAL NOTES OF FORM 202-CAAPP.

19a) MAXIMUM OPERATING HOURS	HOURS/DAY:	DAYS/WEEK:	WEEKS/YEAR:
8,760	*24*	*7*	*52*
b) TYPICAL OPERATING HOURS	HOURS/DAY:	DAYS/WEEK:	WEEKS/YEAR:
7,488	*24*	*6*	*52*

20) ANNUAL THROUGHPUT	DEC-FEB(%):	MAR-MAY(%):	JUN-AUG(%):	SEP-NOV(%):
	25	*25*	*25*	*25*

FIRING RATE INFORMATION

21a) RATED OR DESIGN HEAT INPUT CAPACITY (MILLION BTU/HR):

6,7000,000 Btu/hr (Each Unit)

b) IS MORE THAN ONE FUEL FIRED AT A TIME? ☐ YES ☒ NO

IF YES, EXPLAIN:

21c) IF HEAT INPUT CAPACITY IS 100 MILLION BTU/HOUR OR GREATER, PROVIDE FURNACE VOLUME (CUBIC FEET)
NOTE: FURNACE VOLUME IS DEFINED AS THAT VOLUME BOUNDED BY THE FRONT FURNACE WALL WHERE THE BURNER IS LOCATED, THE FURNACE SIDE WATERWALL, AND EXTENDING TO THE LEVEL JUST BELOW OR IN FRONT OF THE FIRST ROW OF CONVECTION PASS TUBES.

N/A – Less than 100 mmBtu/hr

	NATURAL GAS	FUEL OIL	COAL	OTHER
d) SINGLE FUEL (MAXIMUM - MILLION BTU/HOUR)				
e) SINGLE FUEL (TYPICAL - MILLION BTU/HOUR)				
f) COMBINED FUEL (TYPICAL - MILLION BTU/HOUR) (IF APPLICABLE)				

NATURAL GAS FIRING

22a) CURRENT ORIGIN OF NATURAL GAS:
☒ PIPELINE (FIRM CONTRACT) ☐ BY-PRODUCT, SPECIFY ORIGIN:
☐ PIPELINE (INTERRUPTIBLE SUPPLY CONTRACT) ☐ OTHER, - SPECIFY:

b) TYPICAL HEAT CONTENT (BTU/SCF):

1,000

c) MAXIMUM CONSUMPTION	SCF/MONTH: ***9.8 mmscf***	SCF/YEAR: ***1,114 mmscf***
d) TYPICAL CONSUMPTION	SCF/MONTH: ***8.5 mmscf***	SCF/YEAR: ***100.3 mmscf***

OIL FIRING – N/A

23a) OIL TYPE (CHECK ONE):
☐ NO. 1 ☐ NO. 2 ☐ NO. 4 ☐ NO. 5 ☐ NO. 6
☐ OTHER, SPECIFY (INCLUDE GENERATOR OR SUPPLIER):

b) TYPICAL HEAT CONTENT:
☐ BTU/LB - OR - ☐ BTU/GAL

c) IS OIL USED ONLY AS A RESERVE FUEL? ☐ YES ☐ NO

d) TYPICAL SULFUR CONTENT AS FIRED (WT %):

e) TYPICAL ASH CONTENT AS FIRED (WT %):

f) MAXIMUM CONSUMPTION	GAL/MONTH:	GAL/YEAR:
g) TYPICAL CONSUMPTION	GAL/MONTH:	GAL/YEAR:

h) FIRING DIRECTION:
☐ HORIZONTAL ☐ TANGENTIAL ☐ OTHER, SPECIFY:

SOLID FUEL FIRING- N/A			
*24a) SOLID FUEL TYPE (CHECK ALL THAT APPLY):	☐ SUB-BITUMINOUS COAL	☐ LIGNITE COAL	☐ BITUMINOUS COAL
	☐ ANTHRACITE COAL	☐ OTHER, SPECIFY:	
b) TYPICAL HEAT CONTENT AS FIRED (BTU/LB):		c) TYPICAL MOISTURE CONTENT AS FIRED (WT %):	
d) TYPICAL SULFUR CONTENT AS FIRED (WT %):		e) TYPICAL ASH CONTENT AS FIRED (WT %):	
f) TYPICAL FINES CONTENT (% LESS THAN 1/8 INCH):		g) IS THE COAL CLEANED? ☐ YES ☐ NO	
h) HOW MUCH COAL REFUSE IS IN THE FUEL? (WT %):			
i) MAXIMUM CONSUMPTION	TON/MONTH:	TON/YEAR:	
j) TYPICAL CONSUMPTION	TON/MONTH:	TON/YEAR:	
k) FIRING TYPE (CHECK ONE):	☐ TRAVELING GRATE	☐ SPREADER STOKER % REINJECTION:	
	☐ CYCLONE	☐ PULVERIZED, TYPE (CIRCLE ONE): WET BOTTOM DRY BOTTOM	
	☐ HORIZONTALLY OPPOSED	☐ OTHER, SPECIFY:	

*NOTE: IF REQUIRED, SUBMIT COPIES OF THOSE PORTIONS OF COAL SUPPLY CONTRACTS WHICH SET FORTH THE SPECIFICATIONS OF THE FUEL AND THE DURATION OF THE CONTRACT. IF THE ACTUAL FUEL FIRED IS A BLEND OF COAL, SUBMIT APPROPRIATE PORTIONS OF ALL FUEL CONTRACTS AND STATE THE MANNER BY WHICH THE FUELS ARE BLENDED AND ACTUALLY FIRED. ATTACH AND LABEL AS EXHIBIT 240-2.

OTHER FUEL FIRING – N/A			
25a) OTHER FUEL FIRING	TYPE	SUPPLIER	
a)			
b)			
b) TYPICAL HEAT CONTENT (SPECIFY UNITS):		c) TYPICAL NITROGEN CONTENT AS FIRED (WT %):	
d) TYPICAL SULFUR CONTENT AS FIRED (WT %):		e) TYPICAL ASH CONTENT AS FIRED (WT %):	
f) MAXIMUM CONSUMPTION	(SPECIFY UNITS/MONTH):	(SPECIFY UNITS/YEAR):	
g) TYPICAL CONSUMPTION	(SPECIFY UNITS/MONTH):	(SPECIFY UNITS/YEAR):	

APPLICABLE RULES

26) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., PARTICULATE MATTER, IAC 212.206, <= 0.10 LBS/MMBTU):

REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
Regulated Pollutants	*35 IAC 201.141*	*Emissions so as to not violate provisions.*

27) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
Regulated Pollutants	*35 IAC 201.301*	*Maintain Records to demonstrate compliance*

28) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
Regulated Pollutants	*35 IAC 201.302*	*Annual Reporting*

29) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
N/A		

30) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)
Regulated Pollutants	*35 IAC 201.282*	*Testing , as requested by EPA*

NMLP 0304

31) DOES THE EMISSION UNIT QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE? ☐ YES ☒ NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 240-3, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

COMPLIANCE INFORMATION

32) IS THE EMISSION UNIT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE – ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

33) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Maintenance of natural gas usage records.

34) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Maintenance of natural gas usage records.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

35a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Gas usage	*Therms*	*Gas Bill*	*Monthly*

35b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Gas Usage	*Gas Bills*	*Facility Manager*	*Facility Manager*

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? ☒ YES ☐ NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND SUBMITTAL TO THE AGENCY UPON REQUEST? ☒ YES ☐ NO

IF NO, EXPLAIN:

36a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

N/A

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., OPACITY)?

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., IN STACK MONITOR):

36d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? ☐ YES ☐ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? ☐ YES ☐ NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED EMISSION UNIT IS IN OPERATION? ☐ YES ☐ NO

IF NO, EXPLAIN:

37) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 240-4:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
N/A				

38) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Annual Emission Reporting	*Annual Emission Report*	*Annually*

(39)EMISSION INFORMATION

☒ [1]ACTUAL EMISSION RATE
☐ [1]UNCONTROLLED EMISSION RATE

REGULATED AIR POLLUTANT		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[3]OTHER TERMS	[4]DM	ALLOWABLE BY RULE EMISSION RATE: [5]RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	[2]PERMITTED EMISSION RATE: RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:	1.12	5.0			3	( )			1.12 lbs/hr	5.0
	TYPICAL:	1.12	4.22			3	( )				
LEAD	MAXIMUM:						( )				
	TYPICAL:						( )				
NITROGEN OXIDES (NOx)	MAXIMUM:	1.34	5.86			3	( )			1.34	5.86
	TYPICAL:	1.34	5.02			3	( )				
PARTICULATE MATTER (PART)	MAXIMUM:	0.1	0.44			3	( )			0.1	0.44
	TYPICAL:	0.1	0.38			3	( )				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						( )				
	TYPICAL:						( )				
SULFUR DIOXIDE (SO2)	MAXIMUM:	0.00	0.04			3	( )			0.00	0.04
	TYPICAL:	0.00	0.04			3	( )				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:	0.08	0.32			3	( )			0.08	0.32
	TYPICAL:	0.08	0.28			3	( )				
OTHER, SPECIFY: _____	MAXIMUM:						( )				
	TYPICAL:						( )				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

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

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

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(40) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		☐ [1]ACTUAL EMISSION RATE ☐ [1]UNCONTROLLED EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	[2]CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[4]DM	[5]RATE OR STANDARD	APPLICABLE RULE
N/A		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE:		MAXIMUM:	*10.0*	*1.2*		*2*	*98% by wt control device*	*CFR 61*
Benzene	*71432*	TYPICAL:	*8.0*	*0.8*		*2*	*leak-tight trucks*	*61.302(b),(d)*

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 240-6.

[1]PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.
[2]CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
[5]RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION		
THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.		
41) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT: ***Boilers 1 and 2***		
42) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS. ***Stacks for each unit***		
43) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT): ***100***		
44) DISCHARGE HEIGHT ABOVE GRADE (FT): ***50***		
45) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):		
46) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA. ***1.5***		
47) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM): ***~2500***	b) TYPICAL (ACFM): ***~2500***
48) EXIT GAS TEMPERATURE	a) MAXIMUM (°F): ***~500***	b) TYPICAL (°F): ***~500***
49) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD): ***Vertical***		

50) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

	NAME	FLOW DIAGRAM DESIGNATION
a)	***Boiler 1 and 2***	***Boilers 1 and 2***
b)		
c)		
d)		
e)		

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.		
51a) LATITUDE:	b) LONGITUDE:	
52) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):

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

	Typical	Maximum	Units
Operating Hours	7,488	8,760	hours
Firing Rate	6.70	6.70	million Btu/hr

Heating Value
1000 Btu/scf

Example Calculation

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

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

TYPICAL SEASON EMISSIONS

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

MAXIMUM EMISSIONS

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

Annual Natural Gas Fuel Use: 50.17 million scf/yr. (typ.)
58.69 million scf/yr. (max.)

0.0067 million scf/hr

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

	Typical	Maximum	Units
Operating Hours	7,488	8,760	hours
Firing Rate	6.70	6.70	million Btu/hr

Heating Value
1000 Btu/scf

Example Calculation

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

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

TYPICAL SEASON EMISSIONS

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

MAXIMUM EMISSIONS

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

Annual Natural Gas Fuel Use: 50.17 million scf/yr. (typ.)
58.69 million scf/yr. (max.)

0.0067 million scf/hr

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

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

AIR POLLUTION CONTROL EQUIPMENT DATA AND INFORMATION

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

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

SOURCE INFORMATION

1) SOURCE NAME:
NACME Steel Processing

2) DATE FORM PREPARED:	3) SOURCE ID NO. (IF KNOWN):
9/30/05	***031600FWL***

GENERAL INFORMATION

4) NAME OF AIR POLLUTION CONTROL EQUIPMENT AND/OR CONTROL SYSTEM:
Pickle Line Scrubber

5) FLOW DIAGRAM DESIGNATION OF CONTROL EQUIPMENT AND/OR CONTROL SYSTEM:
Scrubber

6) MANUFACTURER OF CONTROL EQUIPMENT (IF KNOWN):
PRO-ECO

7) MODEL NUMBER (IF KNOWN):	8) SERIAL NUMBER (IF KNOWN):
9) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EQUIPMENT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):

10) BRIEFLY DESCRIBE MODIFICATION (IF APPLICABLE):
Operates at all time Steel Pickle Line is in operation.

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

FOR APPLICANT'S USE
_____

NMLP 0313

11) LIST ALL EMISSION UNITS AND OTHER CONTROL EQUIPMENT DUCTING EMISSIONS TO THIS CONTROL EQUIPMENT:

NAME	DESIGNATION OR CODE NUMBER
Steel Pickling Line	*Steel Pickling Line*
3, HCl Storage Tank Vents	*HCL Storage Tanks 1-3*

12) DOES THE CONTROL EQUIPMENT HAVE MORE THAN ONE MODE OF OPERATION? ☐ YES ☒ NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE AIR POLLUTION CONTROL EQUIPMENT FORM 260-CAAPP MUST BE COMPLETED FOR EACH MODE):

13) IDENTIFY ALL ATTACHMENTS TO THIS FORM RELATED TO THIS AIR POLLUTION CONTROL EQUIPMENT (E.G., TECHNICAL DRAWINGS):

None

OPERATING SCHEDULE

14) IDENTIFY ANY PERIOD WHEN THE CONTROL EQUIPMENT WILL NOT BE OPERATING DUE TO SCHEDULED MAINTENANCE AND/OR REPAIRS WHEN THE FEEDING EMISSION UNIT(S) TO THIS CONTROL EQUIPMENT IS/ARE IN OPERATION:

Not Applicable – Will be operated at all times Steel Pickle Line is in operation.

15a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEEDING EMISSION UNIT(S) WHEN THE CONTROL EQUIPMENT IS/ARE NOT USED:

Not Applicable – See #14

b) IS THIS CONTROL EQUIPMENT IN OPERATION AT ALL OTHER TIMES THAT THE FEEDING EMISSION UNIT(S) IS/ARE IN OPERATION? ☒ YES ☐ NO

IF NO, EXPLAIN AND PROVIDE THE DURATION OF THE CONTROL EQUIPMENT DOWNTIME:

APPLICABLE RULES

24) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.204(j)(4), 3.5 LBS/GAL):

REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
HCl	*40 CFR 63, Subpart CCC*	*No HCl in a concentration in excess of 18 ppmv or mass emission rate that corresponds to a collection efficiency of less than 97%*

25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
HCl	*35 IAC 201.301*	*Compliance Records*
HCl	*40 CFR 63. 1160*	*Operations and Maintenance Plan/Inspection Records*
HCl	*40 CFR 63.10*	*Relevant Records*

26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
HCl	*35 IAC 201.302*	*Annual Reporting/Compliance Notification*
HCl	*40 CFR 63.89(e)(3)*	*Testing Notification and Methods*

27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
HCl	*201.281*	*Emission Source/Device Monitoring*
HCl	*40 CFR 63.1160*	*Pressure Drop Across Scrubber (Once Per Shift)*
HCl	*40 CFR 63.1162*	*Scrubber Water Flow*

28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)
HCl	*35 IAC 201.282/40 CFR 63.1161 and 1162*	*Emission Testing, As Required*
HCl	*40 CFR 63.7 and 63.8(e)(4)*	*Emission Testing to Establish Compliance with Relevant Limit*

COMPLIANCE INFORMATION

21) IS THE CONTROL SYSTEM IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

22) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Maintenance of water flow to scrubber and emission testing.

23) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Maintenance of water flow and maintenance records.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

24a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Scrubber Water Flow	*Gallons*	*Flow meter*	*Monitored Continuous/ Recorded Once Per Shift*

24b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Scrubber Water Flow	*Flow Log*	*Shift Operator*	*Production Manager*

c) IS COMPLIANCE OF THE CONTROL EQUIPMENT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? ☒ YES ☐ NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? ☒ YES ☐ NO

IF NO, EXPLAIN:

25a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Continuous flow monitor

b) WHAT OPERATING PARAMETER(S) IS(ARE) BEING MONITORED (E.G., COMBUSTION CHAMBER TEMPERATURE)?

Gallons per minute

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., EXIT OF COMBUSTION CHAMBER):

Adjacent to Scrubber

25d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? ☐ YES ☒ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

Scrubber Flow Meter – Recorded by hand once per shift as required.

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? ☐ YES ☒ NO

IF NO, EXPLAIN:

Reviewed for accuracy per manufacturer's specifications.

f) IS EACH MONITOR OPERATED AT ALL TIMES THE CONTROL EQUIPMENT IS IN OPERATION? ☐ YES ☐ NO

IF NO, EXPLAIN:

26) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-1:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
April 2002	*Method 1-4, 26A*	*GE Mostardi Platt*	*Typical*	*0.217 lbs/hr (6.87 ppmv)*

27) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Testing notification	*Tst Notification*	*Prior to testing*
Annual Emission Reporting	*Annual Emission Report*	*Annually*

CAPTURE AND CONTROL

28) DESCRIBE THE CAPTURE SYSTEM USED TO CONTAIN, COLLECT AND TRANSPORT EMISSIONS TO THE CONTROL EQUIPMENT. INCLUDE ALL HOODS, DUCTS, FANS, ETC. ALSO INCLUDE THE METHOD OF CAPTURE USED AT EACH EMISSION POINT. (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-2):

Covered Pickling Tanks (two cover system)

29) ARE FEATURES OF THE CAPTURE SYSTEM ACCURATELY DEPICTED IN THE FLOW DIAGRAM CONTAINED IN THIS APPLICATION? ☒ YES ☐ NO

IF NO, A SKETCH SHOWING THE FEATURES OF THE CAPTURE SYSTEM SHOULD BE ATTACHED AND LABELED AS EXHIBIT 260-3:

30) PROVIDE THE ACTUAL (MINIMUM AND TYPICAL) CAPTURE SYSTEM EFFICIENCY, CONTROL EQUIPMENT DESTRUCTION/REMOVAL EFFICIENCY, AND THE OVERALL REDUCTION EFFICIENCY PROVIDED BY THE COMBINATION OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT FOR EACH REGULATED AIR POLLUTANT TO BE CONTROLLED. ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EFFICIENCIES WERE BASED AND LABEL AS EXHIBIT 260-4:

a) CONTROL PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%) (MIN)	CAPTURE SYSTEM EFFICIENCY (%) (TYP)	CONTROL EQUIPMENT EFFICIENCY (%) (MIN)	CONTROL EQUIPMENT EFFICIENCY (%) (TYP)	OVERALL REDUCTION EFFICIENCY (%) (MIN)	OVERALL REDUCTION EFFICIENCY (%) (TYP)
i	***HCl***	***100***	***100***	***97-99***	***97-99***	***97-99***	***97-99***
ii							
iii							

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

18 ppmv or mass emission rate that corresponds to a collection efficiency of less than 97%

b) METHOD USED TO DETERMINE EACH OF THE ABOVE EFFICIENCIES (E.G., STACK TEST, MATERIAL BALANCE, MANUFACTURER'S GUARANTEE, ETC.) AND THE DATE LAST TESTED, IF APPLICABLE:

	EFFICIENCY DETERMINATION METHOD	DATE LAST TESTED
CAPTURE:		
CONTROL:		
OVERALL:		***April 2002***

c) REQUIRED PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)	CONTROL EQUIPMENT EFFICIENCY (%)	OVERALL REDUCTION EFFICIENCY (%)	APPLICABLE RULE
i	***HCl***				***40 CFR63.1161***
ii					

iv EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

(31) EMISSION INFORMATION

REGULATED AIR POLLUTANT		[1] ACTUAL EMISSION RATE: LBS PER HOUR (LBS/HR)	[1] ACTUAL EMISSION RATE: TONS PER YEAR (TONS/YR)	[3] OTHER TERMS	[3] OTHER TERMS	[4] DM	ALLOWABLE BY RULE EMISSION RATE: [5] RATE (UNITS)	ALLOWABLE BY RULE EMISSION RATE: APPLICABLE RULES	ALLOWABLE BY RULE EMISSION RATE: TONS PER YEAR (TONS/YR)	[2] PERMITTED EMISSION RATE: RATE (UNITS)	[2] PERMITTED EMISSION RATE: TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						( )				
	TYPICAL:						( )				
LEAD	MAXIMUM:						( )				
	TYPICAL:						( )				
NITROGEN OXIDES (NOx)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER (PART)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						( )				
	TYPICAL:						( )				
SULFUR DIOXIDE (SO2)	MAXIMUM:						( )				
	TYPICAL:						( )				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						( )				
	TYPICAL:						( )				
OTHER, SPECIFY:	MAXIMUM:	*0.217*	*0.951*				*18 (ppmv)*	*63.1161*	*10*	*0.0065 lbs HCl/ton steel*	*0.951 tpy*
HCl	TYPICAL:	*0.217*	*0.951*				*18 (ppmv)*				
EXAMPLE PARTICULATE MATTER	MAXIMUM:	*5.00*	*21.9*	*0.3 GR/DSCF*		*1*	*6.0 (LBS/HR)*	*212.321*	*26.28*	*5.5 LBS/HR*	*22*
	TYPICAL:	*4.00*	*14.4*	*0.24 GR/DSCF*		*4*	*5.5 (LBS/HR)*	*212.321*	*19.80*		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-5.

[1] PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
[2] PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
[3] PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
[4] DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
[5] RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

(32) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		[1]ACTUAL EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	[2]CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[4]DM	[5]RATE OR STANDARD	APPLICABLE RULE
HCl	*7647-01-0*	MAXIMUM:	*0.217*	*0.951*		*1*	*18ppm*	*63.1161*
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE:		MAXIMUM:	*10.0*	*1.2*		*2*	*98% by wt control device*	*CFR 61*
Benzene	*71432*	TYPICAL:	*8.0*	*0.8*		*2*	*leak-tight trucks*	*61.302(b),(d)*

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-6.

[1]PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
[2]CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
[5]RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

NMLP 0321

EXHAUST POINT INFORMATION
33) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS. ***Stack***
34) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT): ***100***
35) DISCHARGE HEIGHT ABOVE GRADE (FT): ***50***
36) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):
37) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA. ***2***

38) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM): ***7,200***	b) TYPICAL (ACFM): ***7,065***
39) EXIT GAS TEMPERATURE	a) MAXIMUM (°F): ***126.2***	b) TYPICAL (°F): ***125.6***

40) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):
Vertical

41) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

	NAME	FLOW DIAGRAM DESIGNATION
a)	***Steel Pickling Line***	***Steel Pickling Line***
b)		
c)		
d)		
e)		
f)		
g)		

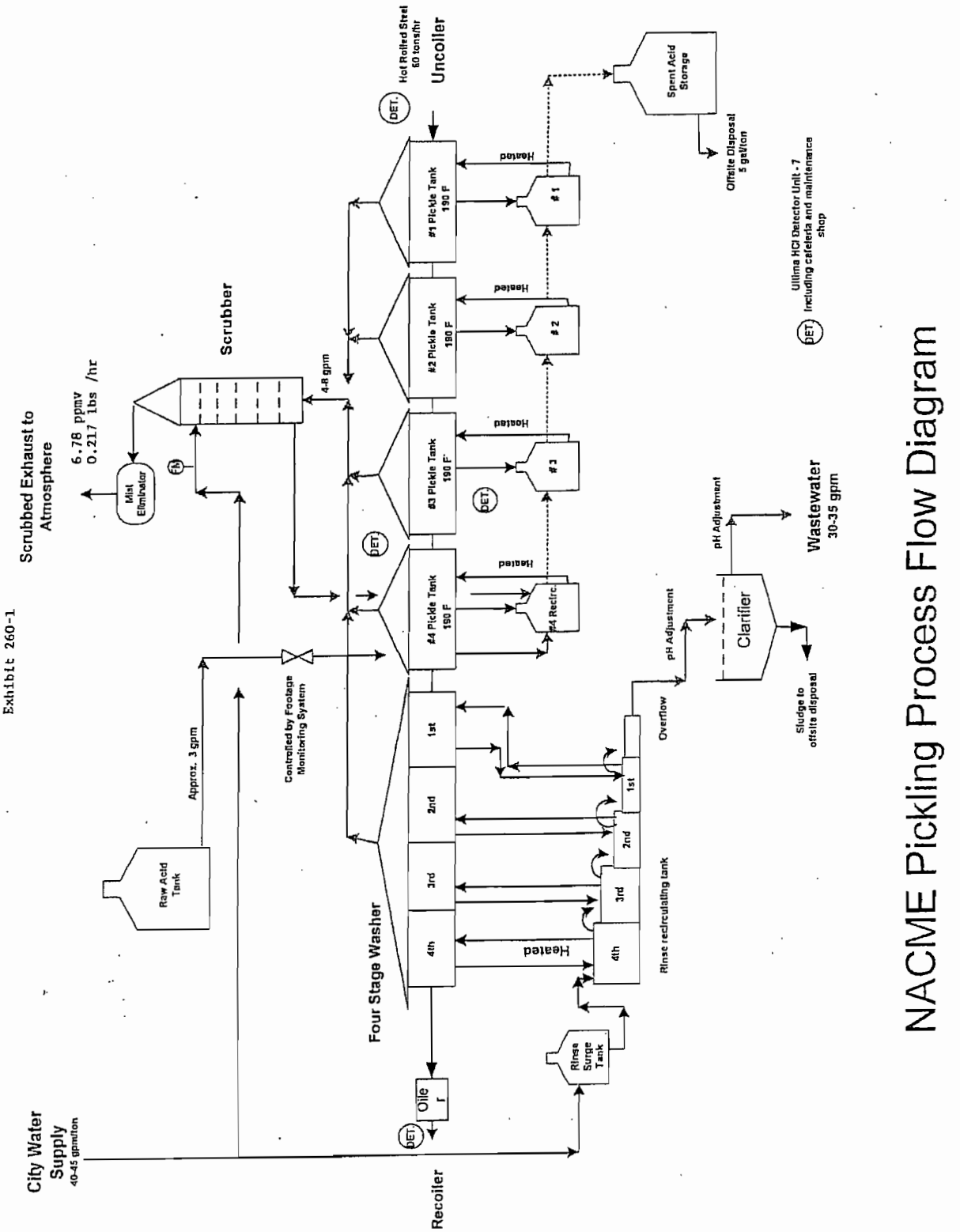
42) WHAT PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS ARE BEING DUCTED TO THIS EXHAUST POINT (%)?
100

43) IF THE PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS BEING DUCTED TO THE EXHAUST POINT IS NOT 100%, THEN EXPLAIN WHERE THE REMAINING EMISSIONS ARE BEING EXHAUSTED TO:

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

44a) LATITUDE:	b) LONGITUDE:	
45) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):

EXHIBIT 260-1



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NMLP 0323

EXHIBIT 260-2 PICKLE LINE EMISSION CALCULATIONS

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

Operating Conditions

Annual HCl Solution Usage/AST Throughput = 1,103,250 gallons X 9.91 lbs/gal =
8,606,400 lbs Solution Usage/yr (4303.2 tpy)
Scrubber Water Flow = 2.6 gallons per minute (Average)
Emission Test Process Rate = **200 tons/six hours = 33.3333 tons per hour**
Emission Testing Hourly Emissions Rate* = **0.217 lbs HCL/hr**
Emission Factor = 0.217 lbs HCl per hour/33.3333 tons steel = **0.0065 lbs HCl/Ton Steel**
Currrent Maximum Operating Hours = 3 shifts/day X 8 hrs/shift X 6 days/wk X 52 wks/yr = **7,488 hours/hr**
Current Typical Operating Hours = 3 shfits/day X 8 hrs/shift X 5 days/wk X 52 wks/yr = **6,240 hrs/yr**
Current Permitted Emission Factor (Scrubber Control)* = **0.0048 lbs HCL/1000 tons Steel Processed**
Emission Scrubber Control Efficiency = **97-99% (Estimated)**
Annual Steel Throughput = **292,000 tons/year (Based only on 2002 testing throughput rate)**

Actual and Potential Emission Calculations (With Federally Enforceable Limitations)

Steel Pickling Emissions = 0.00652 lbs HCl/ton steel X 292,000 tons Steel/year = 1,903 lbs HCl Emitted/Year
Estimated HCl AST Emissions = 0.44 tons HCl per yr**

Hourly Emission Rates

Pickling Line Emissions HCl lbs/hour = (1,902 lbs/year)/7,488 hours/year = **0.254 lbs HCl/hour**

Potential to Emit (Without Control/No Enforceable Limitations)

Uncontrolled Pickling Line Emission Rate = 0.217 lbs HCl/hr/(1-0.95) = ***4.34 lbs HCl/hr***
4.34 lbs HCl per hour/33.333 tons steel per hour = **0.13 lbs HCl/ton steel throughput**
0.13 lbs HCl/tons steel X 292,000 tons steel/yr = **38,018 lbs HCl/yr or 19.0 tpy HCl**

Hourly HCl Solution/Water Usage

HCL Solution = 8,606,400 lbs HCl Solution per year/7,488 hours per year = **1150 lbs HCl Solution/hr**
or 4,303.2 tpy
Water = 2.6 gpm X 60 min/hr = 156.4 gal/hr = **1,303 lbs/hr or 9,760,140 lbs/yr (4880.1 tpy)**

NESHAP Emission Limitations

Test Result HCl emission concenrtation = **6.87 ppmv**
40 CFR 63, Subpart CCC HCl Emission Limit = **18 ppmv**

* April 2002 Emission Test of scrubber stack exhaust (after Control). No Control Efficiency testing completed.

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

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

STORAGE TANK DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	EMISSION POINT #:
	DATE:

NOTE: THIS INFORMATION FORM MUST BE COMPLETED FOR ANY TANK USED IN THE STORAGE OF AN ORGANIC LIQUID OR ANY MATERIALS CONTAINING HAZARDOUS AIR POLLUTANTS. FOR TANKS USED FOR PURPOSES OTHER THAN STORAGE, SUCH AS MIXING TANKS, DAY TANKS, PROCESS TANKS, ETC., PLEASE COMPLETE FORM 220-CAAPP.

SOURCE INFORMATION

1) SOURCE NAME:
NACME Steel Processing

2) DATE FORM PREPARED:	3) SOURCE ID NO. (IF KNOWN):
9/30/05	***031600FWL***

GENERAL INFORMATION

4) TANK DESIGNATION:
HCL Storage Tanks 1, 2, and 3

5) FLOW DIAGRAM DESIGNATION OF TANK:
HCl Storage Tanks 1, 2, and 3

6) MANUFACTURER OF TANK (IF KNOWN):

7) SERIAL NUMBER (IF KNOWN):

8) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS TANK (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):

9) DESCRIPTION OF MODIFICATION (IF APPLICABLE):
N/A

10) DOES THE TANK HAVE MORE THAN ONE MODE OF OPERATION? (E.G., IS THERE MORE THAN ONE PRODUCT STORED IN THE TANK?) ☐ YES ☒ NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS APPLICATION (NOTE: A SEPARATE FORM 232-CAAPP MUST BE COMPLETED FOR EACH MODE):

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

FOR APPLICANT'S USE
_____

11) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS TANK, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):

Scrubber

12) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., PRODUCTION VARIATION, ETC.):

Scrubber Working and Standing Loss Emission Control and Enclosed Lines

TANK INFORMATION

13) TANK CAPACITY (SPECIFY BARRELS OR GALLONS):

14,000 gallons each

14) TANK DIAMETER OR WIDTH (FT):	15) TANK HEIGHT (FT):	16) TANK LENGTH (FT):
12	***18.5***	

17) TANK SHAPE (CHECK ONE): [X] CYLINDRICAL [ ] HORIZONTAL [ ] OTHER; SPECIFY: _____

18) OUTSIDE COLOR OF TANK (CHECK ONE): [ ] WHITE [X] SILVER [ ] OTHER; SPECIFY: _____

19) TANK CONDITION (CHECK ONE): [X] GOOD [ ] FAIR [ ] POOR

20) TANK LOCATION (CHECK ONE): [ ] UNDERGROUND [X] ABOVEGROUND

21) TANK TYPE (CHECK ONE): [X] FIXED ROOF [ ] PRESSURE [ ] EXTERNAL FLOATING ROOF [ ] INTERNAL FLOATING ROOF [ ] VARIABLE VAPOR SPACE; SPECIFY VOLUME EXPANSION CAPACITY (bbl): _____ [ ] OTHER; SPECIFY: _____

22) VENT VALVE INFORMATION: - ***Ducted to Scrubber***

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING (PSIG)	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, VAPOR CONTROL, ETC.)
COMBINATION			
PRESSURE			
VACUUM			
OPEN	***1***	***0***	***Ducted to Scrubber***

THE INFORMATION IN ITEMS 23 AND 24 BELOW NEED ONLY BE PROVIDED IF READILY AVAILABLE

23a) LATITUDE:	b) LONGITUDE:

24a) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):

MATERIAL STORED AND THROUGHPUT INFORMATION

25) CHEMICAL NAME OF MATERIAL STORED:
Hydrochloric Acid (36% Solution)

26) CAS NO. (IF KNOWN):	27) DENSITY (LB/CU.FT.):
7647-01-0	(LB/GALLON): *9.91*
28) VAPOR PRESSURE AT 70 DEGREES FAHRENHEIT (PSIA):	29) MOLECULAR WEIGHT (LB/LB-MOLE):
26 mmHg	*36.46*

30) VAPOR PRESSURE AT MAXIMUM STORAGE TEMPERATURE (PSIA):
Ambient-Same

31) METHOD USED TO DETERMINE VAPOR PRESSURE PURSUANT TO 35 ILL. ADM. CODE 215.108, 218.109-111, OR 219.109-111:

☐ ASTM D2879-86

☒ PUBLISHED LITERATURE, LIST:
MSDS

☐ OTHER; SPECIFY:

32) STORAGE TEMPERATURE

MINIMUM (DEGREES FAHRENHEIT):	MAXIMUM (DEGREES FAHRENHEIT):
Ambient	*Ambient*

33) THROUGHPUT

GAL/DAY:	GAL/YR:
200178	*1,303,250*
BBLS/DAY:	BBLS/YR:

34) MAXIMUM FILL RATE (GAL/HR):

35) IS A PERMANENT SUBMERGED LOADING PIPE USED? ☒ YES ☐ NO

36) IS A VAPOR BALANCE LINE USED? ☐ YES ☒ NO

37) IS ANY OTHER VAPOR LOSS CONTROL DEVICE USED (OTHER THAN VAPOR BALANCE)? ☐ YES ☒ NO

IF YES, COMPLETE "AIR POLLUTION CONTROL EQUIPMENT -- DATA AND INFORMATION, " (FORM 260-CAAPP), AS PART OF THIS APPLICATION.

38) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE PRECEDING INFORMATION, MATERIAL STORAGE INFORMATION AND THROUGHPUT DATA WERE BASED AND LABEL AS EXHIBIT 232-1.

APPLICABLE RULES

39) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATIONS(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS TANK (E.G., VOM, IAC 218.121(a), PRESSURE TANK):

REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
HCl	*40 CFR 63.1159 (Subpart CCC)*	*Closed-vent system for each vessel*

40) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS TANK:

REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
HCl	*35 IAC 201.301*	*Compliance Records*

41) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS TANK:

REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
HCl	*35 IAC 201.302*	*Annual Reporting/Compliance Notification*

42) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS TANK:

REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
HCl	*40 CFR 63.1163*	*Semi-Annual Inspection*

43) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS TANK:

REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)

44) DOES THE TANK QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE? ☐ YES ☒ NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 232-2, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

COMPLIANCE INFORMATION

45) IS THE TANK IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS?: ☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

46) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Maintenance of records - Material throughput, tank dimensions/Vent systems, etc.

47) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Maintenance of records - Material throughput, tank dimensions/Vent systems, etc.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

48a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
HCl Solution Usage	*Tank Throughput*	*Maintenance of Usage Records*	*Monthly*
Tank Dimensions	*Volume/Height/ Diameter*	*Maintenance of Records*	*Ongoing*

b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
HCl Solution Usage	*Delivery Logs*	*Maintenance Manager*	*Production Manager*

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? ☒ YES ☐ NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? ☒ YES ☐ NO

IF NO, EXPLAIN:

49a) DESCRIBE ANY EMISSION MONITORS USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Not Applicable

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., TEMPERATURE)?

Not Applicable

49c) DESCRIBE THE LOCATION OF EACH MONITOR:

Not Applicable

d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? ☐ YES ☐ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? ☐ YES ☐ NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED TANK IS IN OPERATION? ☐ YES ☐ NO

IF NO, EXPLAIN:

50) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 232-3:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS

51) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY

(52)EMISSION INFORMATION

☐ [1]ACTUAL EMISSION RATE

☒ [1]UNCONTROLLED EMISSION RATE

REGULATED AIR POLLUTANT		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[3]OTHER TERMS	[4]DM	ALLOWABLE BY RULE EMISSION RATE [5]RATE (UNITS)	APPLICABLE RULES	ALLOWABLE BY RULE EMISSION RATE TONS PER YEAR (TONS/YR)	[2]PERMITTED EMISSION RATE RATE (UNITS)	[2]PERMITTED EMISSION RATE TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						( )				
	TYPICAL:						( )				
LEAD	MAXIMUM:						( )				
	TYPICAL:						( )				
NITROGEN OXIDES (NOx)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER (PART)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						( )				
	TYPICAL:						( )				
SULFUR DIOXIDE (SO2)	MAXIMUM:						( )				
	TYPICAL:						( )				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						( )				
	TYPICAL:						( )				
OTHER, SPECIFY: HCl	MAXIMUM:	0.1	0.44				0.1 (lbs/hr)	40CFR63.115	0.44	0.1 lbs/hr	0.44
	TYPICAL:	0.1	0.44								
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 232-4.

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

NMLP 0331

(53) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

☒ [1]ACTUAL EMISSION RATE
☐ [1]UNCONTROLLED EMISSION RATE

HAP INFORMATION			POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[4]DM	ALLOWABLE BY RULE	
NAME OF HAP EMITTED	[2]CAS NUMBER						[5]RATE OR STANDARD	APPLICABLE RULE
HCl	*7647-01-0*	MAXIMUM:	*0.1*	*0.44*		*4*	***Rate Emissions to Scrubber***	*40CFR63.1151*
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE: Benzene	*71432*	MAXIMUM:	*10.0*	*1.2*		*2*	*98% by wt control device*	*CFR 61*
		TYPICAL:	*8.0*	*0.8*		*2*	*leak-light trucks*	*61.302(b),(d)*

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 232-5.

[1]PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.
[2]CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
[3]PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
[4]DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
[5]RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

FLOATING ROOF TANK EQUIPMENT INFORMATION (IF APPLICABLE)

54) FLOATING ROOF TYPE (CHECK ONE): ☐ INTERNAL ☐ EXTERNAL ☐ OTHER; SPECIFY:

N/A

55) PRIMARY SEAL TYPE (CHECK ONE): ☐ METALLIC SHOE SEAL ☐ LIQUID MOUNTED RESILIENT SEAL ☐ VAPOR MOUNTED RESILIENT SEAL ☐ OTHER; SPECIFY:

56) IS THE FLOATING ROOF EQUIPPED WITH A SECONDARY SEAL? ☐ YES ☐ NO

IF YES, HOW IS THE SECONDARY SEAL MOUNTED? (CHECK ONE): ☐ SHOE ☐ RIM ☐ OTHER; SPECIFY:

57) IS THE FLOATING ROOF EQUIPPED WITH A WEATHER SHIELD? ☐ YES ☐ NO

58) WHAT IS THE AVERAGE WIND SPEED AT THE TANK SITE (MILES/HR)?

59) WHAT IS THE CONDITION OF THE TANK SHELL INTERIOR? (CHECK ONE): ☐ LIGHT RUST ☐ DENSE RUST ☐ GUNITE LINED ☐ OTHER; EXPLAIN:

60) FOR COLUMN SUPPORTED TANKS, COMPLETE THE FOLLOWING:

NUMBER OF COLUMNS	DIAMETER OF EACH COLUMN (FT)

61) FOR INTERNAL FLOATING ROOF TANKS, COMPLETE THE FOLLOWING:

a) WHAT IS THE METHOD OF BONDING FOR THE DECK? ☐ BOLTING ☐ WELDING ☐ OTHER; SPECIFY:

b) WHAT IS THE TOTAL LENGTH OF ALL DECK SEAMS (FT)?

c) WHAT IS THE DIAMETER OF THE DECK (FT)?

62) FOR INTERNAL FLOATING ROOF TANKS, INDICATE THE NUMBER OF EACH TYPE OF FITTING: ***Not Applicable***

ACCESS HATCH

BOLT COVER, GASKETED:	UNBOLTED COVER, GASKETED:	UNBOLTED COVER, UNGASKETED:

AUTOMATIC GAUGE FLOAT WELL

BOLTED COVER, GASKETED:	UNBOLTED COVER, GASKETED:	UNBOLTED COVER, UNGASKETED:

COLUMN WELL

BUILT-UP COLUMN-SLIDING COVER, GASKETED:	BUILT-UP COLUMN-SLIDING COVER, UNGASKETED:	PIPE COLUMN-FLEXIBLE FABRIC SLEEVE SEAL:

PIPE COLUMN-SLIDING COVER, GASKETED:	PIPE COLUMN-SLIDING COVER, UNGASKETED:

LADDER WELL

SLIDING COVER, GASKETED:	SLIDING COVER, UNGASKETED:

SAMPLE PIPE OR WELL

SLOTTED PIPE-SLIDING COVER, GASKETED:	SLOTTED PIPE-SLIDING COVER, UNGASKETED:	SAMPLE WELL-SLIT FABRIC SEAL (10% OPEN AREA):

ROOF LEG OR HANGER WELL

ADJUSTABLE:	FIXED:

VACUUM BREAKER

WEIGHTED MECHANICAL ACTUATION, GASKETED:	WEIGHTED MECHANICAL ACTUATION, UNGASKETED:

STUB DRAIN

1 INCH DIAMETER:

OTHER (EXPLAIN)

a)
b)
c)

Exhibit 232-5
HCL AST Emission Calculations
NACME Steel Processing
429 West 127th Street
Chicago, Illinois

HCL Emissions - Storage Tanks

A concentrated solution (36% HCl) is kept in storage tanks prior to dilution with additional water in the Pickling Line.
Total HCl Solution Usage = 1,103,250 gallons/yr
AST Working/Standing Losss Emissions routed to scrubber for control.
Current Permitted Rate 0.44 tons HCl/yr and 0.1 lbs HCl/hr

Estimated AST HCl Emissions (after Control)

0.1 lbs HCl/hr
0.44 tons HCl/yr*

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

FOR APPLICANT'S USE
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HAZARDOUS AIR POLLUTANT (HAP) EMISSION SUMMARY

FOR AGENCY USE ONLY
ID NUMBER:
PERMIT #:
DATE:

SOURCE INFORMATION

1) SOURCE NAME:

NACME Steel Processing

2) DATE FORM PREPARED:	3) SOURCE ID NO. (IF KNOWN):
9/30/05	***031600FWL***

HAZARDOUS AIR POLLUTANT EMISSIONS

4) DOES ANY EMISSION UNIT AT THE SOURCE EMIT A HAZARDOUS AIR POLLUTANT? (IF NO, THEN THE REMAINDER OF THIS FORM NEED NOT BE COMPLETED) ☒ YES ☐ NO

5a) DOES THE SOURCE HAVE THE POTENTIAL TO EMIT, IN THE AGGREGATE,:

i) 10 TONS PER YEAR OR MORE OF ANY INDIVIDUAL HAZARDOUS AIR POLLUTANT; ☒ YES ☐ NO

ii) 25 TONS PER YEAR OR MORE OF ANY COMBINATION OF HAZARDOUS AIR POLLUTANTS; ☐ YES ☒ NO

iii) SUCH LESSER QUANTITY AS ESTABLISHED BY RULE WHICH CLASSIFIES THE SOURCE AS MAJOR FOR HAZARDOUS AIR POLLUTANTS; ☐ YES ☒ NO

iv) EMISSIONS OF HAZARDOUS AIR POLLUTANTS WHICH EQUAL OR EXCEED A POLLUTANT SPECIFIC CAAPP APPLICABILITY LEVEL AS ESTABLISHED BY USEPA RULE SUCH THAT THE SOURCE IS REQUIRED TO OBTAIN A CAAPP PERMIT SOLELY FOR THIS REASON (i.e., HAP EMISSIONS BELOW THE CAAPP APPLICABILITY THRESHOLDS SPECIFIED IN ITEMS (i), (ii) &(iii) ABOVE, BUT STILL REQUIRED TO OBTAIN A CAAPP PERMIT PURSUANT TO A REGULATORY REQUIREMENT, e.g., NESHAP)? ☐ YES ☒ NO

b) IF ANSWERED YES TO ANY OF THE ABOVE, IDENTIFY THE HAP(S) FOR WHICH THE SOURCE IS CONSIDERED MAJOR OR REQUIRED TO OBTAIN A CAAPP PERMIT:

Hydrochloric Acid (HCl) Emissions

HAZARDOUS AIR POLLUTANT EMISSIONS TABLE

6) COMPLETE THE FOLLOWING TABLE FOR ALL HAPs WHICH ARE REGULATED AIR POLLUTANTS. THIS TABLE MUST INCLUDE EMISSIONS OF HAPS AT ACTIVITIES PROPOSED TO BE INSIGNIFICANT PURSUANT TO 35 IL. ADM. CODE 201.211. NOTE THAT AN APPLICANT MAY PRESUME THAT AN EMISSION UNIT DOES NOT EMIT A HAP IF IT MEETS THE REQUIREMENTS OF 35 IL. ADM. CODE 201.209.

FOR APPLICANT'S USE
_____

(6) HAZARDOUS AIR POLLUTANT EMISSIONS

COMPLETE THE FOLLOWING TABLE FOR ALL HAPS WHICH ARE REGULATED AIR POLLUTANTS. THIS TABLE MUST INCLUDE EMISSIONS OF HAPS AT ACTIVITIES PROPOSED TO BE INSIGNIFICANT PURSUANT TO 35 IL. ADM. CODE 201.211. NOTE THAT AN APPLICANT MAY PRESUME THAT AN EMISSION UNIT DOES NOT EMIT A HAP IF IT MEETS THE REQUIREMENTS OF 35 IL. ADM. CODE 201.209.

NAME OF HAP EMITTED:	[1]CAS NUMBER	EMISSION UNIT DESIGNATION.	MAXIMUM EMISSIONS (TONS/YR)	TYPICAL EMISSIONS (TONS//YR)	POTENTIAL EMISSIONS (TONS/YR)	OTHER TERMS[2]	APPLICABLE RULE	APPLICABILITY LEVEL (UNITS)
HCl	*7647-01-0*	*Pickle Line*	*0.951*	*0.951*	*0.951*		*40 CFR 63, Subpart CCC*	*18 (ppmv)*
HCl	*7647-01-0*	*ASTs*	*0.44*	*0.44*	*0.44*		*40 CFR 63 Subpart CCC*	—

[1] CAS - CHEMICAL ABSTRACT SERVICE

[2] PROVIDE OTHER TERMS AS NECESSARY TO ESTABLISH APPLICABILITY OR COMPLIANCE WITH REQUIREMENTS.

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DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION
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FUGITIVE EMISSIONS DATA AND INFORMATION	***FOR AGENCY USE ONLY***
	ID NUMBER:
	EMISSION POINT #:
	DATE:

THIS FORM MAY BE COMPLETED FOR FUGITIVE EMISSION ACTIVITIES RATHER THAN COMPLETING AN EMISSION UNIT OR STAND ALONE FORM. FUGITIVE EMISSIONS ARE DEFINED AS THOSE EMISSIONS WHICH COULD NOT REASONABLY PASS THROUGH A STACK, CHIMNEY, VENT OR OTHER FUNCTIONALLY EQUIVALENT OPENING. NOTE THAT UNCAPTURED PROCESS EMISSION UNIT EMISSIONS ARE TYPICALLY NOT CONSIDERED FUGITIVE AND MUST BE ACCOUNTED FOR ON THE APPROPRIATE EMISSION UNIT OR STAND ALONE FORM. ANY EMISSIONS AT THE SOURCE NOT PREVIOUSLY ACCOUNTED FOR ON AN EMISSION UNIT OR STAND ALONE FORM MUST BE ACCOUNTED FOR ON THIS FORM.

SOME EXAMPLES OF EMISSIONS WHICH ARE TYPICALLY CONSIDERED FUGITIVE ARE;

- ROAD DUST EMISSIONS (PAVED ROADS, UNPAVED ROADS, AND LOTS)
- STORAGE PILE EMISSIONS (WIND EROSION, VEHICLE DUMP AND LOAD)
- LOADING/UNLOADING OPERATION EMISSION
- EMISSIONS FROM MATERIAL BEING TRANSPORTED IN A VEHICLE
- EMISSIONS OCCURRING FROM THE UNLOADING AND TRANSPORTING OF MATERIALS COLLECTED BY POLLUTION CONTROL EQUIPMENT
- EQUIPMENT LEAKS (E.G., LEAKS FROM PUMPS, COMPRESSORS, IN-LINE PROCESS VALVES, PRESSURE RELIEF DEVICES, OPEN-ENDED VALVES, SAMPLING CONNECTIONS, FLANGES, AGITATORS, COOLING TOWERS, ETC.)
- GENERAL CLEAN-UP VOM EMISSIONS

NOTE THAT TOTAL EMISSIONS FROM THE SOURCE (TS) ARE EQUAL TO SOURCE-WIDE TOTAL EMISSION UNIT EMISSIONS (PT) PLUS TOTAL FUGITIVE EMISSIONS (FT), E.G., TS = PT + FT.

SOURCE INFORMATION	
1) SOURCE NAME: ***NACME Steel Processing***	
2) DATE FORM PREPARED: ***October 3, 2005***	3) SOURCE ID NO. (IF KNOWN): ***031600FWL***

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

FOR APPLICANT'S USE
_____

GENERAL INFORMATION

4) PROVIDE THE FOLLOWING INFORMATION FOR THE FUGITIVE EMISSION POINTS AT THE SOURCE INCLUDED IN THIS APPLICATION. SIMILAR POINTS MAY BE GROUPED TOGETHER.

NOTE: ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, FROM WHICH THE ABOVE EMISSIONS, WERE BASED AND LABEL AS EXHIBIT 391-1. IF THE ABOVE SPACE WAS NOT ADEQUATE , LIST ALL OTHER FUGITIVE POINTS AND INCLUDE THE REQUIRED INFORMATION ON THIS ATTACHMENT.

FOR PAVED AND UNPAVED ROADS, INCLUDE ROAD MILES (E.G., 6 MILES OF UNPAVED ROADS); FOR STORAGE PILES, INDICATE THE MATERIAL BEING STORED (E.G., 20 LIMESTONE STORAGE PILES); FOR EQUIPMENT LEAK POINTS, GROUP SIMILAR POINTS TOGETHER (E.G., 15 ORGANIC LIQUID PUMPS); FOR TRANSFER POINTS, IDENTIFY THE ORIGIN AND DESTINATION OF TRANSFER AND THE MATERIAL BEING TRANSFERRED (E.G., 5 BELT TO BIN TRANSFERS OF CORN).

FUGITIVE POINT(S)	REGULATED AIR POLLUTANT(S)	UNCONTROLLED ANNUAL EMISSIONS (TONS/YR)	
		MAXIMUM	TYPICAL
Paved Road (1 miles)	*PM*	*0.1*	*0.02*

5) ATTACH A DIAGRAM OF THE SOURCE THAT INDICATES THE LOCATION OF ALL FUGITIVE EMISSION POINTS. A SKETCH DRAWING WITH THE PROPER NOTATIONS IS SUFFICIENT. ALTERNATIVELY, THE REQUIRED INFORMATION MAY BE PLACED ON A COPY OF AN EXISTING PLAN OR MAP SUBMITTED WITH THIS APPLICATION (E.G., PLOT PLAN/MAP). ALSO INDICATE ON THIS DIAGRAM THE LOCATION OF ANY AMBIENT AIR MONITORING STATIONS. LABEL THIS DIAGRAM 391-2. NOTE: EQUIPMENT LEAK FUGITIVE EMISSION POINTS NEED NOT BE SHOWN ON THIS DIAGRAM.

APPLICABLE RULES

6) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATIONS(S) WHICH ARE APPLICABLE TO FUGITIVE EMISSIONS AT THE SOURCE (E.G., ROAD SEGMENT F, PM-10, IAC 212.316(d), OPACITY < OR = 10% AT 4 FT):

FUGITIVE POINTS(S)	REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
Road Segment	*PM*	*IAC 212.316(d)*	*< 10% Opacity limit*

7) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE:

FUGITIVE POINTS(S)	REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
Paved Road	*PM*	*IAC 212.316(g)*	*Control Measure Application, as applicable*

IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS 391-3.

NMLP 0340

APPLICABLE RULES (CON'T)

8) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE:

FUGITIVE POINTS(S)	REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
Paved Road	*PM*	*IAC 212.316(g)*	*Report Submittal upon request*

9) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE:

FUGITIVE POINTS(S)	REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)

10) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE:

FUGITIVE POINTS(S)	REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)

IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS 391-3.

NMLP 0341

COMPLIANCE INFORMATION

11) IS EACH FUGITIVE POINT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE – ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

12) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Access roads and parking areas are paved.

13) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Maintain paved areas and periodically clean.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

14a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	FUGITIVE POINT	METHOD OF MEASUREMENT	FREQUENCY
PM	*Paved Road*	*Visual*	*Routinely*

b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Paved area cleanup	*Maintain records of cleaned*	*Maintenance Manager*	*Vice President - Supplies*

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? ☒ YES ☐ NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? ☒ YES ☐ NO

IF NO, EXPLAIN:

15a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Emission are insignificant from paved access road and parking area. Parking area and road is small in size.

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED?

Condition of pavement.

c) DESCRIBE THE LOCATION OF EACH MONITOR AND/OR MONITORING PROCEDURES:

Visual inspection only.

d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? ☐ YES ☒ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

Visual inspection

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? ☐ YES ☒ NO

IF NO, EXPLAIN:

N/A

f) IS EACH MONITOR OPERATED AT ALL TIMES THAT FUGITIVE EMISSIONS MAY OCCUR? ☐ YES ☒ NO

IF NO, EXPLAIN:

N/A

16) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 391-4:

FUGITIVE POINT(S)	TEST DATE	TEST METHOD	TESTING FIRM	OPERATING CONDITIONS	SUMMARY OF RESULTS

17) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

FUGITIVE POINT(S)	REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Paved Road	*Excessive fugitive emissions*	*N/A*	*N/A*

FUGITIVE DUST (complete if applicable)

18a) ARE OPACITY READINGS REQUIRED TO BE TAKEN? ☐ YES ☒ NO

IF YES, SPECIFY THE RELEVANT FUGITIVE POINT(S):

i) _____

ii) _____

iii) _____

b) SPECIFY THE FREQUENCY OF OPACITY READINGS:

c) IS USEPA METHOD 9 USED TO READ ALL VISIBLE EMISSIONS? ☐ YES ☒ NO

IF NO, EXPLAIN AND SPECIFY THE METHOD USED:

Paved Road – Insignificant fugitive PM emissions

19) IS AN OPERATING PROGRAM FOR FUGITIVE PARTICULATE MATTER AND/OR PM10 CONTROL REQUIRED PURSUANT TO 35 ILL. ADM. CODE 212.309? ☒ YES ☐ NO

IF YES, HAS SUCH A PROGRAM PREVIOUSLY BEEN SUBMITTED TO THE AGENCY? ☐ YES ☒ NO

IF SUCH A PROGRAM HAS NOT BEEN SUBMITTED, IT SHOULD BE ATTACHED TO THIS FORM UPON SUBMITTAL AND LABELED AS 391-5.

20) IS THE SOURCE IN COMPLIANCE WITH 35 ILL. ADM. CODE 212.301 WHICH STATES THAT NO EMISSIONS SHALL BE VISIBLE BEYOND THE PROPERTY LINE OF THE SOURCE? ☒ YES ☐ NO

IF NO, EXPLAIN:

FUGITIVE VOM FROM EQUIPMENT LEAKS (complete if applicable) – N/A No VOM Sources

21) INDICATE WHICH OF THE FOLLOWING METHODS WAS USED TO ESTIMATE FUGITIVE EMISSIONS OF VOM FROM EQUIPMENT LEAKS:

☐ AVERAGE EMISSION FACTOR ☐ LEAK/NO LEAK EMISSION FACTOR ☐ STRATIFIED EMISSION FACTOR ☐ LEAK RATE/SCREENING VALUE CORRELATION

☐ OTHER; (SPECIFY):

ATTACH A COPY OF THE FINAL REPORT FOR ANY OF THE ABOVE TESTS THAT HAVE BEEN PERFORMED. THIS REPORT SHOULD SUMMARIZE THE TEST PROCEDURES AND RESULTS. LABEL AS 391-6.

22) IS THERE AN ACTIVE INSPECTION AND MONITORING PROGRAM OF EQUIPMENT LEAKS? ☐ YES ☐ NO

IF YES, PROVIDE A DESCRIPTION OF SUCH PROGRAM OR ATTACH THE INSPECTION PROGRAM TO THIS FORM AND LABEL AS 391-7:

FUGITIVE VOM FROM CLEANUP OPERATIONS (complete if applicable) – N/A

23) COMPLETE THE FOLLOWING FOR EACH VOM CONTAINING MATERIAL USED FOR CLEANUP FOR WHICH THE EMISSIONS ARE FUGITIVE AND HAVE NOT BEEN ACCOUNTED FOR ELSEWHERE IN THIS APPLICATION:

	GENERIC NAME OF CLEANUP MATERIAL	DENSITY (LB/GAL)	VOM CONTENT (WEIGHT %)	ANNUAL USAGE (GAL/YEAR) MAX	ANNUAL USAGE (GAL/YEAR) TYPICAL
a)					
b)					
c)					

24) EXPLAIN THE MEANS BY WHICH THESE MATERIALS ARE USED AND WHAT EQUIPMENT OR ITEMS ARE BEING CLEANED:

25a) ARE ALL VOM USED IN CLEANUP OPERATIONS CONSIDERED TO BE EMITTED? ☐ YES ☐ NO

IF NO, EXPLAIN:

b) IF APPLICABLE, COMPLETE ITEMS i, ii, AND iii BELOW:

i) PROVIDE THE MAXIMUM AND TYPICAL AMOUNT OF VOM RECLAIMED AND/OR SHIPPED OFF-SITE AND HENCE, NOT EMITTED:

	(GALSYR)	(TONS/YR)
MAX		
TYP		

ii) EXPLAIN THE MEANS BY WHICH VOM IS COLLECTED FOR RECLAMATION AND/OR DISPOSAL:

iii) EXPLAIN THE MEANS BY WHICH THE AMOUNT OF VOM COLLECTED IS MEASURED OR DETERMINED:

FUGITIVE CONTROL

26) COMPLETE THE FOLLOWING, INCLUDING THE MINIMUM AND TYPICAL REDUCTION EFFICIENCY FOR EACH CONTROL MEASURE UTILIZED:

	CONTROL MEASURES	REGULATED AIR POLLUTANT	FUGITIVE POINT(S) CONTROLLED	REDUCTION EFF.(%) MIN	REDUCTION EFF.(%) TYP	FREQUENCY OF CONTROL APPLICATION
a)	*Clean Paved Roads*	*PM*				*Routine*
b)						
c)						
d)						
e)						

NOTE: IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS 391-8.

27) PROVIDE A DESCRIPTION OF EACH OF THE CONTROL MEASURES INDICATED IN ITEM 32. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS 391-9.

	CONTROL MEASURE(S)	DESCRIPTION
a)	*Visual Inspection of Road/Parking Area Condition*	*Inspect paved areas for condition, repair, as required.*
b)		

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
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COMPLIANCE PLAN/ SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT	***FOR AGENCY USE ONLY***
	ID NUMBER:
	PERMIT #:
	DATE:

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT THE APPLICANT SUBMIT A COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR ALL EMISSION UNITS AT THE CAAPP SOURCE, REGARDLESS OF THE COMPLIANCE STATUS OF EACH INDIVIDUAL EMISSION UNIT. THIS FORM REQUIRES THAT THE COMPLIANCE STATUS BE STATED FOR EACH EMISSION UNIT. APPLICATION FORM 294-CAAPP, "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE - ADDENDUM FOR NON COMPLYING EMISSION UNITS," MUST BE SUBMITTED FOR EACH EMISSION UNIT NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF SUBMITTAL.

SOURCE INFORMATION

1) SOURCE NAME:

NACME Steel Processing

2) DATE FORM PREPARED:	3) SOURCE ID NO. (IF KNOWN):
10/03/05	***031600FWL***

SOURCE COMPLIANCE INFORMATION

4) DESCRIBE THE COMPLIANCE STATUS OF THE SOURCE WITH ALL APPLICABLE REQUIREMENTS (E.G., "SOURCE IS IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS"):

Source is in compliance with applicable requirements.

5) IF IN COMPLIANCE, WILL THE SOURCE CONTINUE TO COMPLY WITH ALL APPLICABLE REQUIREMENTS?

☒ YES ☐ NO

IF NO, EXPLAIN:

6) WILL THE SOURCE MEET, ON A TIMELY BASIS, APPLICABLE REQUIREMENTS WHICH BECOME EFFECTIVE DURING THE PERMIT TERM?

☒ YES ☐ NO

IF NO, EXPLAIN

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

FOR APPLICANT'S USE
_____

EMISSION UNITS COMPLIANCE INFORMATION

7) EMISSION UNITS IN COMPLIANCE
THE FOLLOWING EMISSION UNITS ARE IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AND WILL CONTINUE TO COMPLY WITH SUCH REQUIREMENTS DURING THE PERMIT TERM. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-1:

DESIGNATION ID NUMBER	EMISSION UNIT
Steel Pickling Line 1	*Steel Pickling Line*
HCL ASTs 1 and 2	*HCl ASTs*

8) EMISSION UNITS SUBJECT TO FUTURE COMPLIANCE DATES
THE FOLLOWING EMISSION UNITS, WHICH ARE CURRENTLY IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS, WILL ACHIEVE ON A TIMELY BASIS, AND MAINTAIN COMPLIANCE WITH, FUTURE COMPLIANCE DATES AS THEY BECOME APPLICABLE DURING THE PERMIT TERM. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-2:

DESIGNATION ID NUMBER	EMISSION UNIT	FUTURE COMPLIANCE DATE (MONTH/DAY/YEAR)
N/A		

9a) EMISSION UNITS NOT IN COMPLIANCE - COMPLIANCE TO BE ACHIEVED PRIOR TO PERMIT ISSUANCE
THE FOLLOWING EMISSION UNITS ARE NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT APPLICATION. HOWEVER, THESE EMISSION UNITS WILL ACHIEVE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS PRIOR TO PERMIT ISSUANCE AND WILL CONTINUE TO COMPLY WITH SUCH REQUIREMENTS DURING THE PERMIT TERM. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-3:

DESIGNATION ID NUMBER	EMISSION UNIT	FUTURE COMPLIANCE DATE (MONTH/DAY/YEAR)
N/A		

b) THE FOLLOWING IS A NARRATIVE DESCRIPTION OF THE MEANS BY WHICH COMPLIANCE WILL BE ACHIEVED FOR EACH OF THE EMISSION UNITS LISTED IN 9a) ABOVE. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-4:

Not Applicable

10) EMISSION UNITS NOT IN COMPLIANCE - COMPLIANCE WILL NOT BE ACHIEVED PRIOR TO PERMIT ISSUANCE
THE FOLLOWING EMISSION UNITS WILL NOT BE IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT ISSUANCE. A FORM 294-CAAPP, "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE - ADDENDUM FOR NON COMPLYING EMISSION UNITS," MUST BE SUBMITTED FOR EMISSION UNITS NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT ISSUANCE. A FORM 294-CAAPP IS SUBMITTED FOR THE FOLLOWING EMISSION UNITS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-5:

DESIGNATION ID NUMBER	EMISSION UNIT	DATE COMPLIANCE SCHEDULED TO BE ACHIEVED (MONTH/DAY/YEAR)
N/A		

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

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

COMPLIANCE CERTIFICATION

FOR AGENCY USE ONLY
ID NUMBER:
PERMIT #:
DATE:

AN APPLICATION FOR A CAAPP PERMIT MUST CONTAIN A CERTIFICATION OF COMPLIANCE SIGNED BY A RESPONSIBLE OFFICIAL. THIS FORM MUST BE SUBMITTED WITH THE ORIGINAL CAAPP PERMIT APPLICATION AND UPDATED ON AN ANNUAL BASIS.

SOURCE INFORMATION

1) SOURCE NAME:
NACME Steel Processing

2) DATE FORM PREPARED:	3) SOURCE ID NO. (IF KNOWN):
10/3/05	***031600FWL***

4) CAAPP PERMIT NUMBER (IF KNOWN):
N/A – No CAAPP Permit

5) IS THIS THE FIRST SUBMITTAL OF THIS FORM? ☒ YES ☐ NO

IF NO, WHAT IS THE REPORTING PERIOD COVERED BY THIS FORM? / / TO: / /

SOURCE COMPLIANCE INFORMATION

6) DOES THE SIGNATORY OF THIS FORM HEREBY CERTIFY THAT THE SOURCE IS IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO

IF NO, EXPLAIN:

7) PROVIDE THE SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATION DURING THE PERMIT TERM, E.G., ONCE ANNUALLY IN JANUARY (NOTE THAT SUCH CERTIFICATION MUST BE SUBMITTED NO LESS FREQUENTLY THAN ANNUALLY):

N/A

8) INDICATE THE COMPLIANCE STATUS OF THE SOURCE WITH ANY APPLICABLE ENHANCED MONITORING AND COMPLIANCE CERTIFICATION REQUIREMENTS OF THE CLEAN AIR ACT, E.G., NO ENHANCED MONITORING REQUIRED AND IN COMPLIANCE WITH COMPLIANCE CERTIFICATION REQUIREMENTS:

No Enhanced Monitoring required and in compliance with compliance certification requirements.

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

FOR APPLICANT'S USE
_____

EMISSION UNITS COMPLIANCE INFORMATION

9a) THE FOLLOWING EMISSION UNITS ARE IN COMPLIANCE WITH APPLICABLE REQUIREMENTS SUCH AS EMISSION STANDARDS, EMISSION CONTROL REQUIREMENTS, EMISSION TESTING, COURT REQUIREMENTS, WORK PRACTICES, OR ENHANCED MONITORING, BASED ON THE COMPLIANCE METHODS SPECIFIED BELOW (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-1):

EMISSION UNIT	APPLICABLE RULE	COMPLIANCE DETERMINATION METHOD
Steel Pickling Line	*40 CFR 63, Subpart CCC*	*Emission Testing*
HCl AST	*40 CFR 63, Subpart CCC*	*Records maintenance*

9b) LIST THE EMISSION UNITS THAT WERE NOT IN CONTINUOUS COMPLIANCE SINCE THE LAST REPORTING PERIOD, AND THE REASON(S) FOR NONCOMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-2.):

EMISSION UNIT	REASON(S) FOR NONCOMPLIANCE
N/A	*0I-*

COMPLIANCE INFORMATION

10) SUMMARY OF METHODS USED TO DETERMINE COMPLIANCE:

a) DESCRIPTION OF TESTING METHODS USED TO DEMONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-3.):

EPA Emission Testing Methods 1-4, and 26A completed in April 2002.

10b) DESCRIPTION OF MONITORING PROCEDURES USED TO DEMONSTRATE COMPLIANCE, INCLUDING ANY ENHANCED MONITORING REQUIREMENTS OF THE ACT (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-4.):

N/A

c) DESCRIPTION OF RECORDKEEPING USED TO DEMONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-5.):

Emission Test Report, steel throughput, scrubber water flow, and tank records.

10d) DESCRIPTION OF REPORTING USED TO DEMONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-6.):

Annual Emission Reporting/Emission Test Report Submittal.

SIGNATURE BLOCK

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE RETURNED AS INCOMPLETE.

11) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE.

AUTHORIZED SIGNATURE:

BY: _____ ***Production Manager***

AUTHORIZED SIGNATURE — TITLE OF SIGNATORY

William Reichel

TYPED OR PRINTED NAME OF SIGNATORY — DATE

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 11
DECEMBER 6, 2005, CAAPP APPLICATION COMPLETENESS DETERMINATION OF SOURCE FEE DETERMINATION FOR NACME'S 2005 FESOP APPLICATION ("2005 CAAPP APPLICATION COMPLETION DETERMINATION")

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

217/785-5151 ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

CAAPP APPLICATION COMPLETENESS DETERMINATION
AND SOURCE FEE DETERMINATION

APPLICANT

NACME Steel Processing, LLC
Attn: William Reichel
429 West 127th Street
Chicago, Illinois 60628

Date of Determination:	December 6, 2005
Application/Permit No.:	05100052
I.D. Number:	031600FWL
Date Received:	October 25, 2005
Source Name:	NACME Steel Processing, LLC
Location of Source:	429 West 127th Street, Chicago, 60628

Dear Mr. Reichel:

This letter provides notification that your Clean Air Act Permit Program (CAAPP) application received on the date indicated above, has been determined by the Agency to be complete pursuant to Section 39.5(5) of the Illinois Environmental Protection Act (Act).

As provided in Section 39.5(18) of the Act, a CAAPP source shall pay a fee. Attached is the annual fee bill for this CAAPP source as determined from information included in your application, on form 292-CAAPP - FEE DETERMINATION FOR CAAPP PERMIT. Payment of the fee is due within 45 days of the billing date indicated on the billing statement.

Notwithstanding the completeness determination, the Agency may request additional information necessary to evaluate or take final action on the CAAPP application. 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,

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

DES:YMC:psj

Enclosure(s)

FOS2 Region 2
Application File
Compliance & Systems Management Section

ROCKFORD – 4302 North Main Street, Rockford, IL 61103 – (815) 987-7760 • DES PLAINES – 9511 W. Harrison St., Des Plaines, IL 60016 – (847) 294-4000
ELGIN – 595 South State, Elgin, IL 60123 – (847) 608-3131 • PEORIA – 5415 N. University St., Peoria, IL 61614 – (309) 693-5463
BUREAU OF LAND - PEORIA – 7620 N. University St., Peoria, IL 61614 – (309) 693-5462 • CHAMPAIGN – 2125 South First Street, Champaign, IL 61820 – (217) 278-5800
SPRINGFIELD – 4500 S. Sixth Street Rd., Springfield, IL 62706 – (217) 786-6892 • COLLINSVILLE – 2009 Mall Street, Collinsville, IL 62234 – (618) 346-5120
MARION – 2309 W. Main St., Suite 116, Marion, IL 62959 – (618) 993-7200

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

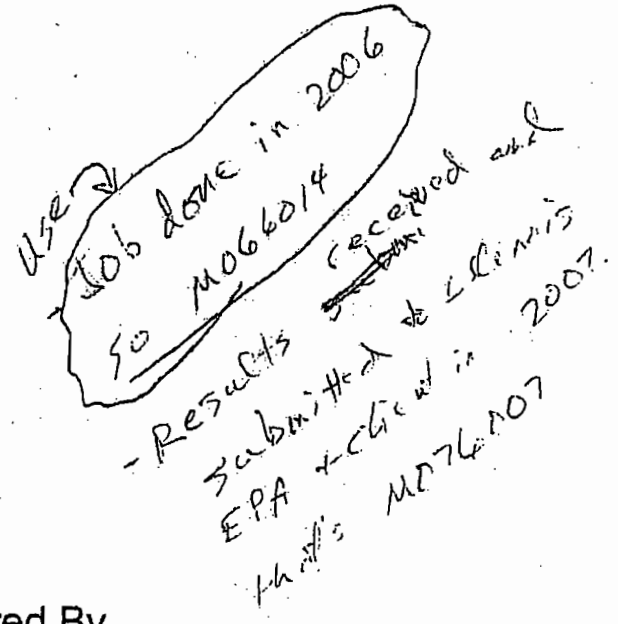
TAB 12
DECEMBER 21, 2006, HYDROGEN CHLORIDE EMISSIONS TEST REPORT ("DECEMBER 2006 STACK TEST REPORT")

Platt Environmental Services, Inc.

371 Balm Court
Wood Dale, IL 60191
630-521-9400
630-521-9494 fax

Hydrogen Chloride Emissions Test Report

Nacme Steel Processing, LLC
Steel Pickling Line HCl Scrubber Exhaust Stack
Chicago, Illinois
December 21, 2006



Prepared By

Platt Environmental Services, Inc.

Report No. PE2006234

TABLE OF CONTENTS

Introduction

PLATT ENVIRONMENTAL SERVICES, INC. (PESI) conducted a hydrogen chloride (HCl) emissions test program for Nacme Steel Processing, LLC on December 21, 2006. This report summarizes the results of the test program and test methods used.

The test location, test date and test parameters are summarized below.

Test Overview

Test Location	Test Date	Test Parameters
Steel Pickling Line HCl Scrubber Exhaust Stack	December 21, 2006	USEPA Methods 1, 2, 3, 26A, 40CFR60, Appendix A

The test program was conducted by PESI personnel. The identification of individuals associated with the test program, are summarized below.

Location	Address	Contact
Test Facility	Nacme Steel Processing, LLC 429 W. 127th Street Chicago, IL 60628	Bill Riechel 773-291-1301 (phone)
Testing Company Representative	Platt Environmental Services, Inc. 371 Balm Court Wood Dale, IL 60191	Chris Jensen 630-521-9400 (phone) cjensen@plattenv.com

The test crew consisted of Messrs. Larry Sorce, Dan Tuider, and Chris Jensen of PESI. The purpose of the test program was to demonstrate compliance with applicable emissions limits listed in Table 1.

Mr. Marcus Hatch from the Illinois Environmental Protection Agency observed the testing.

Executive Summary

Selected results of the test program are summarized below, in Table 1. A complete summary of emission test results, for each location, follows the narrative portion of this report, in the tables following.

Table 1

Test Results

Test Location	Test Parameter	Emission Rate	Emission Limit
		ppmvd	ppmvd
Steel Pickling Line HCl Scrubber Exhaust Stack	HCl	0.01	18.0

Test No. 1 failed the post-test leak check. A fourth test was performed and all emissions are based on Tests Nos. 2, 3, and 4.

Emissions are based on the HCl laboratory analysis of less then 0.02 milligrams for each of the three samples.

Test Methodology

Emissions testing was conducted following the methods specified in 40 CFR, Part 60, Appendix A. Schematics of the sampling trains used are included in the appendix. Copies of field data sheets and/or analyzer print-outs for each test run are included in appendix.

The following methodologies were used during the test program:

Method 1 (40 CFR, Part 60, Appendix A)

Test measurement points were selected in accordance with Method 1. The characteristics of each measurement location are summarized below, in Table 4.

Table 2

Sample Point Selection

Location	Upstream Diameters	Downstream Diameters	Test Parameter	Number of Sampling Points
HCl Scrubber Stack	3	3	Method 26A	24

Method 2 (40 CFR, Part 60, Appendix A)

Gas velocity was measured following Method 2, for purposes of calculating stack gas volumetric flow rate. An S-type pitot tube, differential pressure gauge, thermocouple and temperature readout were used to determine gas velocity at each sample point. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data is presented in the appendix.

Method 3 (40 CFR, Part 60, Appendix A)

Stack gas molecular weight was determined in accordance with Method 3. An Orsat analyzer was used to determine stack gas oxygen and carbon dioxide content and, by difference, nitrogen content. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data is presented in the appendix.

Method 26A (40 CFR, Part 60, Appendix A)

Stack gas hydrogen chloride (HCl) concentrations and emission rates were determined in accordance with Method 26A.

An Environmental Supply Company sampling train was used to sample stack gas, in the manner specified in the Method. TEI Analytical of Niles, Illinois conducted analyses of the samples collected. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data is presented in the appendix.

Test Result Summaries

Company: Nacme Steel Processing, LLC
Plant: Chicago Facility
Unit: HCl Scrubber Exhaust Stack

Source Condition	Maximum	Maximum	Maximum	
Date	12/21/06	12/21/06	12/21/06	
Start Time	13:11	15:01	16:49	
End Time	14:17	16:06	17:55	
	Run 2	Run 3	Run 4	Average
Stack Conditions				
Average Gas Temperature, F	99.9	97.6	97.6	98.4
Flue Gas Moisture, percent by volume	5.9%	5.6%	5.6%	5.7%
Average Flue Pressure, in Hg	29.43	29.43	29.43	29.43
Gas Sample Volume, dscf	36.793	37.586	38.904	37.761
Average Gas Velocity, ft/sec	15.812	16.013	16.664	16.163
Gas Volumetric Flow Rate, acfm	6,706	6,791	7,068	6,855
Gas Volumetric Flow Rate, dscfm	5,855	5,973	6,252	6,027
Average $\%CO_2$ by volume, dry basis	0.0	0.0	0.0	0.0
Average $\%O_2$ by volume, dry basis	20.9	20.9	20.9	20.9
Isokinetic Variance	97.1	97.2	96.8	97.0
Total tons of Steel per Hour	114.750	113.305	131.940	119.998
	HCl			
ppm	0.01	0.01	0.01	0.01
µg/dscm	19.20	18.79	18.15	18.71
lb/hr	0.0004	0.0004	0.0004	0.0004
lbs HCl/ton Steel	3.6693E-06	3.7106E-06	3.2018E-06	3.5272E-06

Process Data

Production data was recorded by Nacme Steel Processing, LLC personnel during each test run in order to correlate emission rates to production in accordance with permit conditions and applicable regulations. Production data is summarized below:

Process Data

Test Run	Test Duration	Production Rate	Units
2	66 minutes	114.750	Tons/hr
3	65 minutes	113.305	Tons/hr
4	66 minutes	131.940	Tons/hr

Conclusion and Certification

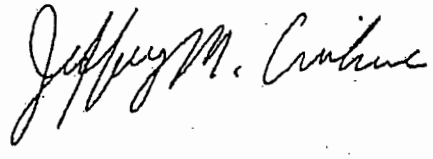
PLATT ENVIRONMENTAL SERVICES, INC. is pleased to have been of service to Nacme Steel Processing, LLC. If you have any questions regarding this test report, please to not hesitate to contact us at 630-521-9400{phone number}.

CERTIFICATION

As project manager, I hereby certify that this test report represents and true and accurate summary of emissions test results and the methodologies employed to obtain those results, and the test program was performed in accordance with that methods specified in this test report.

PLATT ENVIRONMENTAL SERVICES

Chris E. Jensen — Program Manager



Jeffrey M. Crivlare — Quality Assurance

APPENDIX

NPC - 1 Stack test 12/21/06

	1ST TEST	1st TEST	2nd TEST	3rd TEST
Start Time		11:07 AM	1:00 PM	3:05 PM	4:45 PM
End Time		12:10 AM	2:10 PM	4:15 PM	5:50 PM
Lbs of coils ran	Failed due to testing apparatus	39000	37840	37710
	Glass probe broke	38000	37770	37900
		38160	37930	37750
		38050	37570	51840
		38100	37710	45980
		38190	37790	52700
Total Tons per hour		114.75	113.305	131.94

NATIONAL PROCESSING COMPANY
PICKLE LINE
DAILY PRODUCTION/INSPECTION REPORT

DATE: 12/21/6

PAGE: 1

SHIFT: 7/3

LINE OPERATOR: DJ

EXIT OPERATOR: JOHN C.

NO.	BILL TO	SHIP TO	SALES ORDER #	TAG #	INGOING COIL WT.	TOP CODE	EDGE CODE	GAUGE ID	GAUGE OD	REC DIM	ACTUAL MEASURED SIZE ID	ACTUAL MEASURED SIZE OD	SHIP TAG #	OUT COIL WEIGHT	F P M	COIL RUN TIME	VISUAL INSPECTION COMMENTS	APPROX LINEAR FT
1	Steel W	Steel W	N10194	V64901	40284	1	1	115	117	60 750	60	60	Z30193	[illegible]	300	735	20% 133	1621
2	Gibral.	Gibral.	N10199	V62371	41880	0	1	117	119	60	60	60	Z30194	39450	300	820	133	350
3	11	11	11	V62370	41980	0	1	071	072	11	60	60	Z30195	29500	300	[illegible]	133	350
4	11	11	11	V62369	41030	0	1	071	073	11	60	60	Z30196	39360	300	905	133/	349
5	11	11	11	V62335	41820	0	1	073	076	11	60	60	Z30197	39460	275	940	133 337	349
6	11	11	11	V62336	41670	0	1	072	072	11	60	60	Z30198	39620	275	1025	133	354
7	ISGB	ISGB	N10212	V64985	38310	1	0	221	.222	48.750	49250	49250	Z30199	37990	200	1101	337, FIRST COIL OF STACK	1035
8	11	11	N10212	V64991	38670	1	0	220	222	48.750	49.125	49 125	Z30200	38020	200	1117	999/337,	104
9	11	11	N10212	V64990	38610	1	0	222	221	48.750	49 125	44 125	Z30201	38120	200	1135	337 354	1031

TOP CODE:	EDGE CODE:
0-DRY 1-OIL DL-DRY LUBE PL-PRE-LUBE	0-MILL EDGE 1-CUT EDGE 2-OR MORE SLIT

369,014 ← CHARGED WEIGHT TOTAL

354,130 ← PRODUCED WEIGHT TOTAL

SHIFT TOTALS:		IN	OUT
HOURS: 8	COILS:	20	20
CHARGED: 397	PRODUCED: 387		

Form #P1-1 1/99

National Processing Company - Chicago Division

NMLP 0031

NATIONAL PROCESSING COMPANY
PICKLE LINE
DAILY PRODUCTION/INSPECTION REPORT

DATE: Dec 21st

LINE OPERATOR: DJ

PAGE: 2

SHIFT: 7-3

EXIT OPERATOR: John C.

NO.	BILL TO	SHIP TO	SALES ORDER #	TAG #	INGOING COIL WT.	TOP CODE	EDGE CODE	GAUGE ID	GAUGE OD	REC DIA	ACTUAL MEASURED SIZE ID	ACTUAL MEASURED SIZE OD	SHIP TAG #	OUT COIL WEIGHT	F P M	COIL RUN TIME	VISUAL INSPECTION COMMENTS	APPROX LINEAR FT
10	ISGB	ISGB	N16212	V64994	38130	1	0	.221	.222	48.750	49.125	49.125	[illegible]	38140	200	11:35	354 337	1038
11	"	"	"	V64988	38980	1	0	.222	.222	"	49.125	49.125	[illegible]	38650	200	12:00	337	1036
12	"	"	"	V64987	38230	1	0	.223	.223	"	49.125	49.125	[illegible]	37970	300	12:10	LAST COIL OF STACK [illegible]	1632
13	"	"	"	V64992	[illegible]	1	0	.225	.222	"	49.125	49.125	Z302[illegible]	390[illegible]	300	[illegible]	337	[illegible]
14	"	"	"	V64986	38350	1	0	.221	.224	"	49.125	49.25	[illegible]	380[illegible]	200	1:15	337	1132
15	"	"	"	V64991	38[illegible]	1	0	.221	.221	"	49.125	49.125	Z3027	38160	200	1:25	337	1041
16	"	"	"	V64982	38[illegible]	1	0	.221	.221	"	49.125	49.125	Z30[illegible]	38050	200	1:35	282 337	1032
17	"	"	"	V64983	38[illegible]	1	0	.222	.221	"	49.25	49.250	Z30209	38100	200	1:45	337	1036
18	"	"	"	V64984	3578[illegible]	1	0	.222	.222	"	49.125	49.25	Z30[illegible]	38[illegible]	200	1:55	337	1038

TOP CODE:	EDGE CODE:
0-DRY 1-OIL DL-DRY LUBE PL-PRE-LUBE	0-MILL EDGE 1-CUT EDGE 2-OR MORE SLIT

348,290 ← CHARGED WEIGHT TOTAL

343 660 ← PRODUCED WEIGHT TOTAL

SHIFT TOTALS:		IN	OUT
HOURS:		COILS:	
CHARGED:		PRODUCED:	

NMLP 0032

NATIONAL PROCESSING COMPANY
PICKLE LINE
DAILY PRODUCTION/INSPECTION REPORT

DATE: 12-21-06

LINE OPERATOR: D-Miller

PAGE: 3

SHIFT: 7-3

EXIT OPERATOR: J. Catizone

NO.	BILL TO	SHIP TO	SALES ORDER #	TAG #	INCOMING COIL WT.	TOP CODE	EDGE CODE	GAUGE ID	GAUGE OD	REC DIM	ACTUAL MEASURED SIZE ID	ACTUAL MEASURED SIZE OD	SHIP TAG #	OUT COIL WEIGHT	F P M	COIL RUN TIME	VISUAL INSPECTION COMMENTS	APPROX LINEAR FT
19	TSG13	Eslitter	MO-211	U64980	38530	1	0	.221	.222	48.750	49.25	49 12	Z30211	38060	[illegible]	[illegible]	337	1041
20	"	"	"	U61976	38360	1	0	.221	.222	"	49.25	49.125	Z30212	37580	[illegible]	[illegible]	337	1027
21	"	"	"	U64966	38350	1	0			"								
22	"	"	"	U64965	38360	1	0			"								
23	"	"	"	U64963	38510	1	0			"								

TOP CODE:	EDGE CODE:
0-DRY 1-OIL DL-DRY LUBE PL-PRE-LUBE	0-MILL EDGE 1-CUT EDGE 2-OR MORE SLIT

76,790 ◄ CHARGED WEIGHT TOTAL

75,640 ◄ PRODUCED WEIGHT TOTAL

SHIFT TOTALS:		IN	OUT
HOURS:		COILS:	
CHARGED:		PRODUCED:	

Form #P3-1 1/99

National Processing Company - Chicago Division

NMLP 0033

NATIONAL PROCESSING COMPANY
PICKLE LINE
DAILY PRODUCTION/INSPECTION REPORT

DATE: 12.21.06 PAGE: 1

LINE OPERATOR: D. Hart SHIFT: 3-11

EXIT OPERATOR: J. Arceola

NO.	BILL TO	SHIP TO	SALES ORDER #	TAG #	INCOMING COIL WT.	TOP CODE	EDGE CODE	GAUGE ID	GAUGE OD	REC DIM	ACTUAL MEASURED SIZE ID	ACTUAL MEASURED SIZE OD	SHIP TAG #	OUT COIL WEIGHT	F P M	COIL RUN TIME	VISUAL INSPECTION COMMENTS	APPROX LINEAR FT
1	ISG-3	Slitter	011311	VG41966	38250	1	0	.222	.220	48.750	49.062	49.125	Z-30213	37840	200	2:50	337	1028
2	"	"	"	VG41965	38240	1	0	.222	.221	"	49.187	49.187	Z-30214	37770	200	3:05	337	1029
3	"	"	"	VG4196	38310	1	0	.221	.220	"	49.187	49.187	Z-30215	37930	200	3:15	337	1031
4	"	"	"	V64962	38310	1	0	.220	.220	"	49.250	49.187	Z-30216	37570	200	3:40	337 999-Brn. Surf. Inclus.	1030
5	"	"	"	V64973	38140	1	0	.221	.221	"	49.187	49.187	Z-30217	37710	200	3:50	337	1026
6	"	"	"	V64977	38220	1	0	.221	.220	"	49.187	49.187	Z-30218	37790	200	4:00	337	1031
7	"	"	"	V64967	38240	1	0	.222	.221	"	49.187	49.187	Z-30219	37800	200	4:15	337 END OF TEST 2	1029
8	"	"	"	V64971	38190	1	0	.221	.221	"	49.250	49.187	Z-30220	37710	200	4:25	337 START TEST 3	1028
9	"	"	"	V64970	38220	1	0	.222	.220	"	49.250	49.250	Z-30221	37900	200	4:55	337	1032

TOP CODE:	EDGE CODE:
0-DRY 1-OIL DL-DRY LUBE PL-PRE-LUBE	0-MILL EDGE 1-CUT EDGE 2-OR MORE SLIT

344,240. ← CHARGED WEIGHT TOTAL

340,020. ← PRODUCED WEIGHT TOTAL

SHIFT TOTALS:	IN	OUT
HOURS: 8	COILS: 23	24
CHARGED: 5.01	PRODUCED: 495	

Form #P3-1 1/99

National Processing Company - Chicago Division

N1411 (11/0

Electronic Filing - Received, Clerk's Office : 05/16/2014

219 397 5720 P.07/07

NATIONAL PROCESSING COMPANY
PICKLE LINE
DAILY PRODUCTION/INSPECTION REPORT

DATE: 12/21/06
LINE OPERATOR: Dave P.

PAGE: 2
SHIFT: 3/11
EXIT OPERATOR: [signature]

NO.	BILL TO	SHIP TO	SALES ORDER #	TAG #	INCOMING COIL WT.	TOP CODE	EDGE CODE	GAUGE ID	GAUGE OD	REC DIM	ACTUAL MEASURED SIZE ID	ACTUAL MEASURED SIZE OD	SHIP TAG #	OUT COIL WEIGHT	F P M	COIL RUN TIME	VISUAL INSPECTION COMMENTS	APPROX LINEAR FT
10	EsgB	Slitter	N10211	V64969	38220	1	0	.223	.221	48 750	49 187	49 187	Z30222	[illegible]	200	5 05	337	1098
11	BAR	BAR	N10207	V64257	53200	1	0	.240	.241	48 000	48 187	48 187	Z30223	52840	200	5 15	337 999-Painted #'s	1334
12	"	"	"	V64211	46350	1	0	.241	.243	"	48 625	48 562	Z30224	45980	200	5 25	999-Painted on #'s	1159
13	"	"	"	V64212	52720	1	0	.241	.242	"	48 500	48 500	Z30225	52700	200	5 40	354 999-Painted on #'s	1330
14	"	"	"	V64210	46250	1	0	.240	.241	"	48 562	48 500	Z30226	45970	200	5 50	337 999-Painted on #'s	1157
15	SteelW	SteelW	N10193	V64902	44844	1	0	.231	.236	48 750	49 187	49 125	Z30227	44130	200	6 05	(999/HLD-Not Edge Trimmed) END OF 337 139	1139
16	"	"	"	V64904	46943	1	0	.231	.235	"	49 250	49 187	Z30228	46130	200	6 15	337 (999/HLD-Not Edge Trimmed)	1192
17	"	"	N10196	V64882	47684	1	0	.309	.308	"	49 187	48 875	Z30229	46220	200	6 30	139 (999/HLD-Not Edge Trimmed)	895
18	"	"	"	V64883	47684	1	0	.311	.311	"	49 250	49 062	Z30230	46780	200	6 55	139 (999/HLD-Not Edge Trimmed)	901

TOP CODE	EDGE CODE
0-DRY 1-OIL DL-DRY LUBE PL-PRE-LUBE	0-MILL EDGE 1-CUT EDGE 2-OR MORE SLIT

423,695. ← CHARGED WEIGHT TOTAL

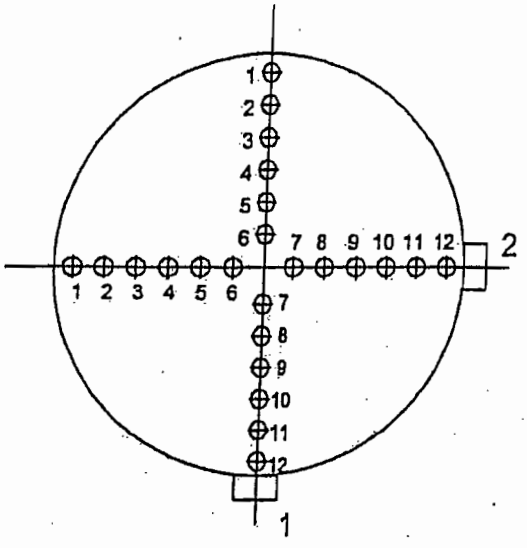
418,500. ← PRODUCED WEIGHT TOTAL

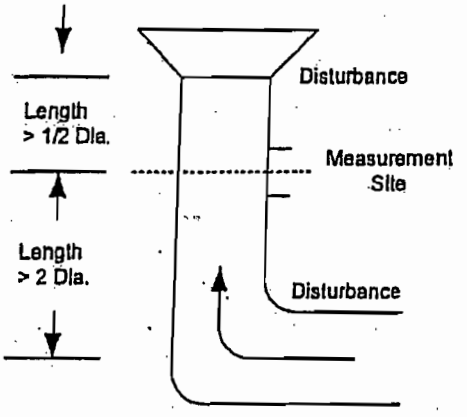
SHIFT TOTALS:		IN	OUT
	HOURS:	COILS:	
	CHARGED:	PRODUCED:	

JAN-03-2007 16:24 NMC/NPC EAST CHGO

NMLP 0035

EQUAL AREA TRAVERSE FOR ROUND DUCTS





Job: Nacme Steel Processing, LLC

Chicago, Illinois

Date: December 21, 2006

Unit: Steel Pickling Line

Test Location: Scrubber Stack

Stack Diameter: 36 Inches

Stack Area: 7.069 Square Feet

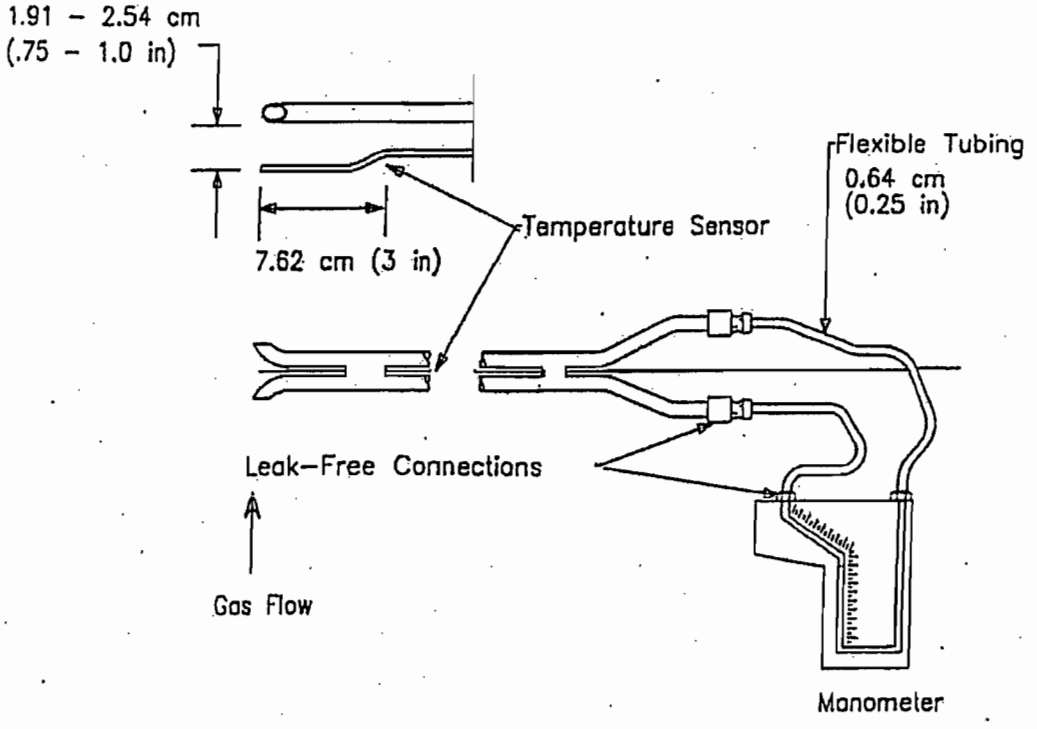
No. of Points per Port: 12

No. of Ports: 2

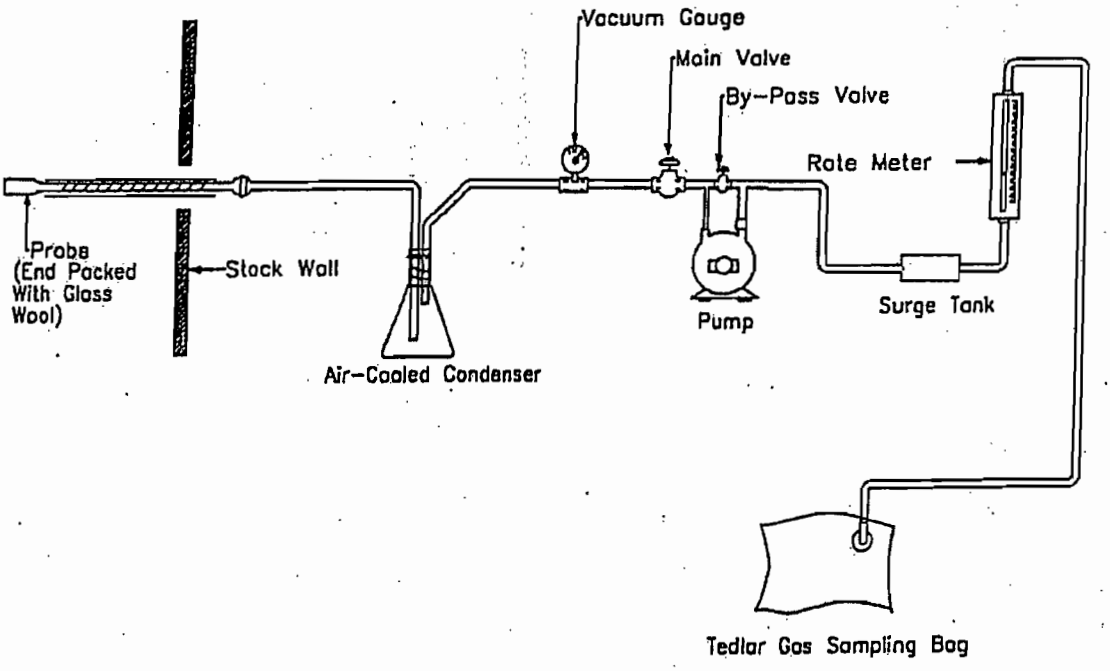
Port Length: 5 Inches

NMLP 0036

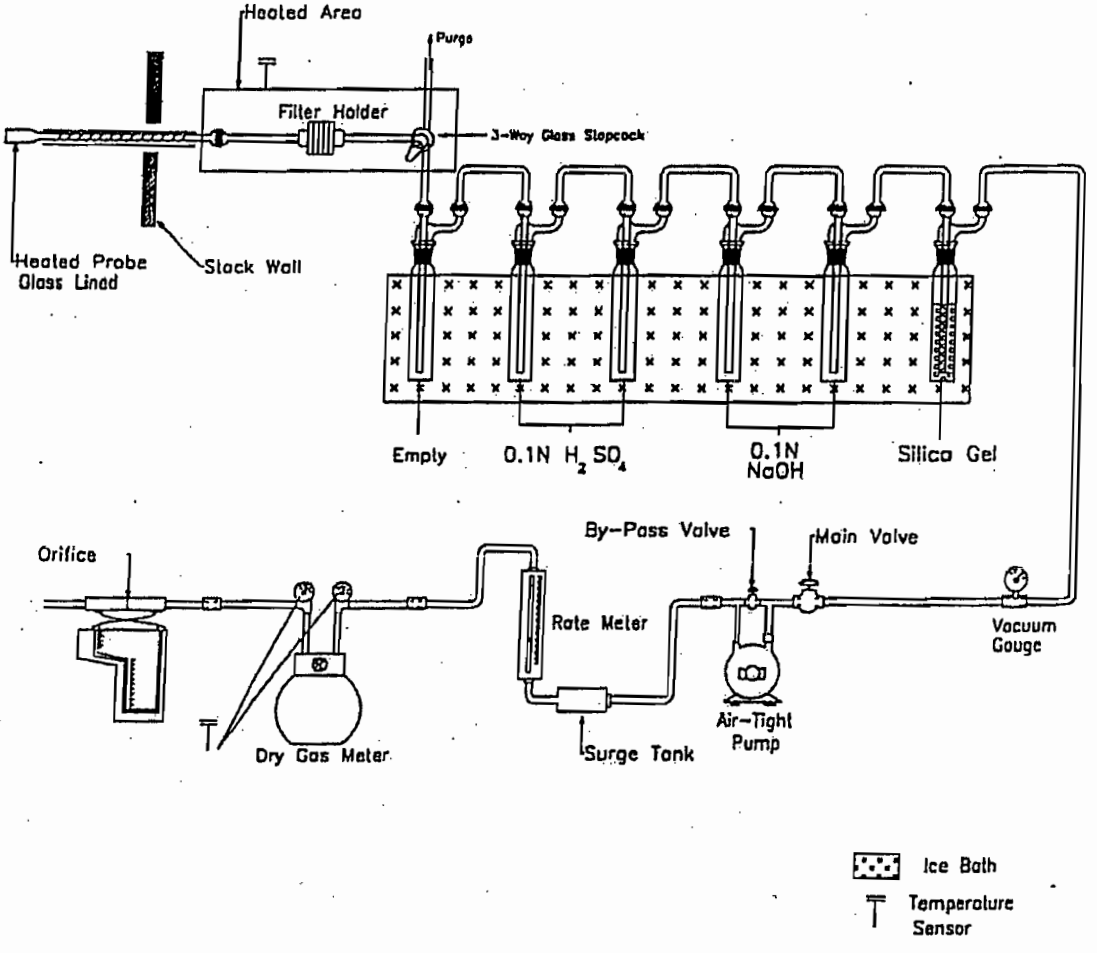
USEPA Method 2 - S-Type Pitot Tube Diagram



USEPA Method 3 - Integrated Oxygen/Carbon Dioxide Sample Train Diagram



USEPA Method 26A – Halogen Sample Train Diagram



PLATT ENVIRONMENTAL SERVICES, INC.

Calculations For Hydrogen Chloride By Method 26 or 26A

Concentration

$$\frac{\text{lbs HCl}}{\text{dscf}} = \frac{\mu\text{g HCl in sample}}{4.536\times10^{8}\times\text{dscf}}$$

where:

$4.536\times10^{8} = \mu g/lb$

dscf = Volume of gas sampled

$$\mu g/lb\ \text{HCl} = \mu g\ \text{Cl} \times \frac{36.453}{35.453}$$

Parts Per Million

$$\text{ppm HCl} = \frac{\text{lbs HCl}}{\text{dscf}} \div \frac{36.453}{385\times10^{6}}$$

where:

385 = Volume of 1 lb mole of gas at 68°F and 29.92 in. Hg

10^{6} = Conversion of ppm v/v

Emission Rate

lbs HCl/dscf × dscfm × 60 min/hr = lbs/hr HCl

PLATT ENVIRONMENTAL SERVICES, INC.

Particulates Calculation Formulas

1. $V_{w(std)} = V_{lc}\left(\frac{\rho_w}{M_w}\right)\left(\frac{RT_{std}}{P_{std}}\right) = K_2 V_{lc}$

2. $V_{m(std)} = V_m Y \left(\frac{T_{std}}{T_m}\right)\left(\frac{(P_{bar} + (\frac{\Delta H}{13.6}))}{P_{std}}\right) = K_1 V_m Y \frac{(P_{bar} + (\frac{\Delta H}{13.6}))}{T_m}$

3. $B_{ws} = \frac{V_{w(std)}}{(V_{m(std)} + V_{w(std)})}$

4. $M_d = 0.44(\%CO_2) + 0.32(\%O_2) + 0.28(\%N_2)$

5. $M_s = M_d(1 - B_{ws}) + 18.0(B_{ws})$

6. $C_n = \frac{m_n}{V_n \rho_n}$

7. $W_a = C_n V_{aw} \rho_n$

8. $C_{acf} = 15.43 K_i\left(\frac{m_n P_s}{V_{w(std)} + V_{m(std)}\ T_s}\right)$

9. $C_S = (15.43 \text{ grains/gram})\ (m_n / V_{m(std)})$

10. $v_s = K_p C_p \sqrt{\frac{\Delta P\ T_s}{P_s M_s}}$

11. $Q_{acfm} = v_s A(60_{sec/min})$

12. $Q_{sd} = (3600_{sec/hr})(1 - B_{ws})\ v_s \left(\frac{T_{std} P_s}{T_s P_{std}}\right) A$

13. E (emission rate, lbs/hr) $= Q_{std}(C_s / 7000 \text{ grains/lb})$

14. $IKV = \frac{T_s V_{m(std)} P_{std}}{T_{std} v_s \theta A_n P_s 60(1 - B_{ws})} = K_4 \frac{T_s V_{m(std)}}{P_s v_s A_n \theta (1 - B_{ws})}$

15. $\%EA = \left(\frac{\%O_2 - (0.5\ \%CO)}{0.264\ \%N_2 - (\%O_2 - 0.5\ \%CO)}\right) \times 100$

PLATT ENVIRONMENTAL SERVICES, INC.

Volumetric Flow Nomenclature

A = Cross-sectional area of stack or duct, ft^2

B_{ws} = Water vapor in gas stream, proportion by volume

C_p = Pitot tube coefficient, dimensionless

M_d = Dry molecular weight of gas, lb/lb-mole

M_s = Molecular weight of gas, wet basis, lb/lb-mole

M_w = Molecular weight of water, 18.0 lb/lb-mole

P_{bar} = Barometric pressure at testing site, in. Hg

P_g = Static pressure of gas, in. Hg (in. H_2O/13.6)

P_s = Absolute pressure of gas, in. Hg = $P_{bar} + P_g$

P_{std} = Standard absolute pressure, 29.92 in. Hg

Q_{acfm} = Actual volumetric gas flow rate, acfm

Q_{sd} = Dry volumetric gas flow rate corrected to standard conditions, dscf/hr

R = Ideal gas constant, 21.85 in. Hg-ft^3/°R-lb-mole

T_s = Absolute gas temperature, °R

T_{std} = Standard absolute temperature, 528°R

v_s = Gas velocity, ft/sec

$V_{w(std)}$ = Volume of water vapor in gas sample, corrected to standard conditions, scf

Y = Dry gas meter calibration factor

Δp = Velocity head of gas, in. H_2O

K_1 = 17.647 °R/in. Hg

%EA = Percent excess air

$\%CO_2$ = Percent carbon dioxide by volume, dry basis

$\%O_2$ = Percent oxygen by volume, dry basis

$\%N_2$ = Percent nitrogen by volume, dry basis

0.264 = Ratio of O_2 to N_2 in air, v/v

0.28 = Molecular weight of N_2 or CO, divided by 100

0.32 = Molecular weight of O_2 divided by 100

0.44 = Molecular weight of CO_2 divided by 100

13.6 = Specific gravity of mercury (Hg)

PLATT ENVIRONMENTAL SERVICES, INC.

Volumetric Air Flow Calculations

$$Vm\,(std) = 17.647 \times Vm \times \left[\frac{(P_{bar} + (\frac{DH}{13.6}))}{(460 + Tm)}\right] \times Y$$

$$Vw\,(std) = 0.0471 \times Vlc$$

$$Bws = \left[\frac{Vw\,(std)}{Vw\,(std) + Vm\,(std)}\right]$$

$$Md = (0.44 \times \%CO_2) + (0.32 \times \%O_2) + [0.28 \times (100 - \%CO_2 - \%O_2)]$$

$$Ms = Md \times (1 - Bws) + (18 \times Bws)$$

$$Vs = \sqrt{\frac{(Ts + 460)}{Ms \times Ps}} \times \sqrt{DP} \times Cp \times 85.49$$

$$Acfm = Vs \times Area\ (of\ stack\ or\ duct) \times 60$$

$$Scfm = Acfm \times 17.647 \times \left[\frac{Ps}{(460 + Ts)}\right]$$

$$Scfh = Scfm \times 60\,\frac{min}{hr}$$

acfm = actual cubic feet per minute
scfm = standard cubic feet per minute
scfh = standard cubic feet per hour

Cp = pitot tube correction factor
Ps = absolute flue gas pressure
Ms = molecular weight of gas (lb/lb mole)
Md = dry molecular weight of gas (lb/lb mole)
Bws = water vapor in gas stream proportion by volume

LABORATORY REPORT

TEI Analytical, Inc.
7177 N. Austin
Niles, IL 60714-4617
847-647-1345

PREPARED FOR:

Jim Platt
Platt Environmental Services Inc.
371 Balm Court
Wood Dale, IL 60191

Report #: 73870
Report Date: 1/8/2007
Sample Received:
12/28/06 13:37

PE2006234

TEI Number	Sample	Chlorine (M26A) mg	Date Performed
73870	001 NaOH	<0.02	1/4/2007
73871	002 NaOH	<0.02	1/4/2007
73872	003 NaOH	<0.02	1/4/2007
73873	005 NaOH Blank	<0.02	1/4/2007

TEI Number	Sample	HCl (M26A) mg	Date Performed
73866	001 H2SO4	<0.02	1/4/2007
73867	002 H2SO4	<0.02	1/4/2007
73868	003 H2SO4	<0.02	1/4/2007
73869	004 H2SO4 Blank	<0.02	1/4/2007

g. e. O'Neill

Gayle E. O'Neill, Ph.D.

Platt Environmental Services, Inc

Chain-of-Custody Form	
Project Number: PE2006234	Date Results Required:
Client: Nacme Steel	TAT Required:
Plant/Test Location: Chicago Plant / HCl Scrubber Stack	Project Supervisor: C. Jensen

Sample Number	Sample Date	Sample Point Identification	# of Conts	Sub Lab	Analysis Required	Volume, mls
001	12/12/06	Test #2	2		Method 26A	
002	12/21/06	Test #3	2		Method 26A	
003	12/21/06	Test #4	2		Method 26A	
004						
005						
006						
007						
008						
009						
010						
011						
012						
013						
014						
015						
016						
017						
018						
019						
020						

Delivered to Lab by: Date/Time:	Received by: Date/Time:	Processed by: Date/Time:

Laboratory Notes:

Customer: Nacme Steel Processing, LLC
Plant: Chicago Facility
Location: HCl Scrubber Exhaust Stack

Date: 12/21/06
Start Time: 11:08
End Time: 12:14

DRY GAS METER CONDITIONS

ΔH:	0.97	in. H_2O
Meter Temperature, Tm:	60.6	°F
Sqrt ΔP:	0.258	in. H_2O
Stack Temperature, Ts:	97.8	°F
Meter Volume, Vm:	35.500	ft^3
Meter Volume, Vmstd:	35.108	dscf
Meter Volume, Vwstd:	2.412	wscf
Isokinetic Variance:	98.4	%I

Sample Train Leak Checks

Pre	0	ft3 @	10	In Hg.
Post	fail	ft3 @		In Hg.

Pitot Leak Checks

Pre	yes	Performed Leak Check @ 3 in. H2O?
Post	yes	

STACK CONDITIONS

Barometric Pressure (Pb):	29.40	in. Hg.
Static Pressure:	0.40	in. H_2O
Flue Pressure (Ps):	29.43	in. Hg. abs.
Carbon Dioxide:	0.0	%
Oxygen:	20.9	%
Nitrogen:	79.1	%
Gas Weight dry, Md:	28.836	lb/lb mole
Gas Weight wet, Ms:	28.175	lb/lb mole
Excess Air:	—	%
	15.181	fps
Volumetric Flow:	6,439	acfm
Volumetric Flow:	5,630	dscfm
Volumetric Flow:	5,995	scfm

MOISTURE DETERMINATION

Initial Impinger Content:	3693.6	ml	Silica Initial Wt.	0	grams
Final Impinger Content:	3744.8	ml	Silica Final Wt.	0	grams
Difference:	51.2		Difference:	0	

Total Water Gain: 51.2 Moisture, Bws: 0.084 Supersaturation Value, Bws: 0.081*

Port-Point No.	Clock Time	Velocity Head Δp In. H2O	Orifice ΔH In. H2O	Actual Meter Vol. ft^3	Sqrt. Δp	Stack Temp °F	Meter Temp Inlet °F	Meter Temp Outlet °F	Pump Vacuum In. Hg	Collected Vol. ft^3	Point Vel ft/sec
1-1	11:08:00	0.07	0.99	71.072	0.265	99	55	55	3.0	1.488	15.583
2	11:10:30	0.07	0.99	72.560	0.265	98	57	55	3.0	1.490	15.583
3	11:13:00	0.07	0.99	74.050	0.265	97	59	56	3.0	1.490	15.583
4	11:15:30	0.07	0.99	75.540	0.265	97	61	56	3.0	1.490	15.583
5	11:18:00	0.07	0.99	77.030	0.265	97	62	56	3.0	1.490	15.583
6	11:20:30	0.06	0.89	78.510	0.245	97	63	56	3.0	1.420	14.427
7	11:23:00	0.06	0.89	79.930	0.245	97	64	57	3.0	1.420	14.427
8	11:25:30	0.06	0.89	81.350	0.245	98	64	57	3.0	1.430	14.427
9	11:28:00	0.06	0.89	82.780	0.245	98	65	57	3.0	1.420	14.427
10	11:30:30	0.07	0.99	84.200	0.265	99	65	57	3.0	1.480	15.583
11	11:33:00	0.08	1.19	85.68	0.283	99	66	58	3.0	1.640	16.659
12	11:35:30	0.09	1.34	87.32	0.300	100	68	58	3.0	1.779	17.689
	11:38:00			89.099							
2-1	11:44:00	0.07	0.99	89.099	0.265	96	62	58	3.0	1.491	15.583
2	11:46:30	0.07	0.99	90.590	0.265	96	63	58	3.0	1.490	15.583
3	11:49:00	0.08	1.19	92.080	0.283	96	65	58	3.0	1.640	16.659
4	11:51:30	0.07	0.99	93.720	0.265	96	65	59	3.0	1.480	15.583
5	11:54:00	0.06	0.89	95.210	0.245	98	65	59	3.0	1.420	14.427
6	11:56:30	0.06	0.89	96.630	0.245	97	65	59	3.0	1.420	14.427
7	11:59:00	0.06	0.89	98.050	0.245	98	65	59	3.0	1.420	14.427
8	12:01:30	0.06	0.89	99.470	0.245	99	66	59	3.0	1.420	14.427
9	12:04:00	0.06	0.89	100.89	0.245	99	66	59	3	1.420	14.427
10	12:06:30	0.06	0.89	102.31	0.245	99	66	59	3	1.420	14.427
11	12:09:00	0.06	0.89	103.73	0.245	99	66	59	3	1.420	14.427
12	12:11:30	0.06	0.89	105.15	0.245	99	66	59	3	1.422	14.427
	12:14:00			106.572							

Test Run 1

Customer: Nacme Steel Processing, LLC
Plant: Chicago Facility
Location: HCl Scrubber Exhaust Stack

Date: 12/21/06
Start Time: 13:11
End Time: 14:17

DRY GAS METER CONDITIONS

ΔH:	0.97	In. H_2O
Meter Temperature, Tm:	63.4	°F
Sqrt ΔP:	0.266	In. H_2O
Stack Temperature, Ts:	99.9	°F
Meter Volume, Vm:	37.399	cf
Meter Volume, Vmstd:	36.793	dscf
Meter Volume, Vwstd:	2.289	wscf
Isokinetic Variance:	97.1	%I

Sample Train Leak Checks

Pre	0	ft3 @	10	In Hg.
Post	0	ft3 @	5	In Hg.

Pilot Leak Checks

Pre	yes	Performed Leak Check @ 3 In. H2O?
Post	yes	

STACK CONDITIONS

Barometric Pressure (Pb):	29.40	In. Hg.
Static Pressure:	0.40	In. H_2O
Flue Pressure (Ps):	29.43	In. Hg. abs.
Carbon Dioxide:	0.0	%
Oxygen:	20.9	%
Nitrogen:	79.1	%
Gas Weight dry, Md:	28.836	lb/lb mole
Gas Weight wet, Ms:	28.201	lb/lb mole
Excess Air:	—	%
Gas Velocity, Vs:	15.812	fps
Volumetric Flow:	6,706	acfm
Volumetric Flow:	5,856	dscfm
Volumetric Flow:	6,220	scfm

MOISTURE DETERMINATION

Initial Impinger Content:	2850.4	ml	Silica Initial Wt.	830.8	grams
Final Impinger Content:	2890.6	ml	Silica Final Wt.	839.2	grams
Difference:	40.2		Difference:	8.4	

Total Water Gain: 48.6 Moisture, Bws: 0.059 Supersaturation Value, Bws: 0.065*

Port-Point No.	Clock Time	Velocity Head Δp In. H2O	Orifice ΔH In. H2O	Actual Meter Vol. ft^3	Sqrt. Δp	Stack Temp °F	Meter Temp Inlet °F	Meter Temp Outlet °F	Pump Vacuum In. Hg	Collected Vol. ft^3	Point Vel ft/sec
1-1*	13:11:00	0.07	1.04	7.436	0.265	98	58	58	3.0	1.542	15.606
2	13:13:30	0.07	1.04	8.980	0.265	99	60	59	3.0	1.530	15.606
3	13:16:00	0.07	1.04	10.510	0.265	100	62	59	3.0	1.540	15.606
4	13:18:30	0.07	1.04	12.050	0.265	101	63	59	3.0	1.530	15.606
5	13:21:00	0.07	1.04	13.580	0.265	101	64	59	3.0	1.540	15.606
6	13:23:30	0.07	1.04	15.120	0.265	101	65	59	3.0	1.530	15.606
7	13:26:00	0.07	1.04	16.650	0.265	102	66	59	3.0	1.540	15.606
8	13:28:30	0.08	1.19	18.190	0.283	103	67	59	3.0	1.640	16.683
9	13:31:00	0.08	1.19	19.830	0.283	103	68	60	3.0	1.640	16.683
10	13:33:30	0.09	1.34	21.470	0.300	103	69	60	3.0	1.760	17.695
11	13:36:00	0.09	1.34	23.230	0.300	103	69	60	3.0	1.720	17.695
12	13:38:30	0.09	1.34	24.950	0.300	103	69	60	3.0	1.781	17.695
	13:41:00			26.731							
2-1	13:47:00	0.06	0.06	26.731	0.245	98	65	60	3.0	1.429	14.448
2	13:49:30	0.06	0.06	28.160	0.245	97	66	60	3.0	1.420	14.448
3	13:52:00	0.06	0.06	29.580	0.245	97	66	61	3.0	1.430	14.448
4	13:54:30	0.07	1.04	31.010	0.265	97	67	61	3.0	1.530	15.606
5	13:57:00	0.07	1.04	32.540	0.265	97	68	61	3.0	1.530	15.606
6	13:59:30	0.07	1.04	34.070	0.265	97	68	61	3.0	1.530	15.606
7	14:02:00	0.07	1.04	35.600	0.265	98	69	61	3.0	1.540	15.606
8	14:04:30	0.07	1.04	37.140	0.265	99	69	61	3.0	1.530	15.606
9	14:07:00	0.07	1.04	38.670	0.265	99	70	61	3.0	1.540	15.606
10	14:09:30	0.07	1.04	40.21	0.265	100	70	61	3	1.530	15.606
11	14:12:00	0.07	1.04	41.74	0.265	101	70	62	3	1.540	15.606
12	14:14:30	0.07	1.04	43.28	0.265	101	70	62	3	1.557	15.606
	14:17:00			44.837							

Test Run 2

NMLP 0047

Customer: Nacme Steel Processing, LLC
Plant: Chicago Facility
Location: HCl Scrubber Exhaust Stack

Date: 12/21/06
Start Time: 15:01
End Time: 16:06

DRY GAS METER CONDITIONS

ΔH:	1.11	In. H_2O
Meter Temperature, Tm:	64.8	°F
Sqrt ΔP:	0.272	In. H_2O
Stack Temperature, Ts:	97.6	°F
Meter Volume, Vm:	38.297	cf
Meter Volume, Vmstd:	37.586	dscf
Meter Volume, Vwstd:	2.214	wscf
Isokinetic Variance:	97.2	%I

Sample Train Leak Checks

Pre	0	ft3	@	10	In Hg.
Post	0	ft3	@	5	In Hg.

Pitot Leak Checks

Pre	yes	Performed Leak Check @ 3 In. H2O?
Post	yes	

STACK CONDITIONS

Barometric Pressure (Pb):	29.40	In. Hg.
Static Pressure:	0.40	In. H_2O
Flue Pressure (Ps):	29.43	In. Hg. abs.
Carbon Dioxide:	0.0	%
Oxygen:	20.9	%
Nitrogen:	79.1	%
Gas Weight dry, Md:	28.836	lb/lb mole
Gas Weight wet, Ms:	28.233	lb/lb mole
Excess Air:	—	%
Gas Velocity, Vs:	16.013	fps
Volumetric Flow:	6,791	acfm
Volumetric Flow:	5,979	dscfm
Volumetric Flow:	8,325	scfm

MOISTURE DETERMINATION

Initial Impinger Content:	2891.8	ml	Silica Initial Wt.	825.6	grams
Final Impinger Content:	2930.8	ml	Silica Final Wt	833.6	grams
Difference:	39		Difference:	8	

Total Water Gain: 47 Moisture, Bws: 0.056 Supersaturation Value, Bws: 0.081*

Port-Point No.	Clock Time	Velocity Head Δp In. H2O	Orifice ΔH In. H2O	Actual Meter Vol. ft³	Sqrt. Δp	Stack Temp °F	Meter Temp Inlet °F	Meter Temp Outlet °F	Pump Vacuum In. Hg	Collected Vol. ft³	Point Vel ft/sec
1-1	15:01:00	0.07	1.05	45.563	0.265	96	61	61	3.0	1.557	15.585
2	15:03:30	0.07	1.05	47.120	0.265	96	62	61	3.0	1.550	15.585
3	15:06:00	0.07	1.05	48.670	0.265	96	64	61	3.0	1.550	15.585
4	15:08:30	0.07	1.05	50.220	0.265	97	66	61	3.0	1.540	15.565
5	15:11:00	0.07	1.05	51.760	0.265	98	66	61	3.0	1.550	15.585
6	15:13:30	0.07	1.05	53.310	0.265	98	67	61	3.0	1.560	15.585
7	15:16:00	0.07	1.05	54.870	0.265	98	66	61	3.0	1.540	15.585
8	15:18:30	0.07	1.05	56.410	0.265	98	66	61	3.0	1.560	15.585
9	15:21:00	0.08	1.2	57.970	0.283	99	69	61	3.0	1.650	16.639
10	15:23:30	0.08	1.2	59.620	0.283	99	69	61	3.0	1.650	16.639
11	15:26:00	0.08	1.2	61.270	0.283	99	69	61	3.0	1.670	16.639
12	15:28:30	0.08	1.2	62.940	0.283	99	70	62	3.0	1.664	16.639
	15:31:00			64.604							
2-1	15:38:00	0.08	1.2	64.604	0.283	95	67	62	3.0	1.676	16.639
2	15:38:30	0.08	1.2	66.280	0.283	95	68	62	3.0	1.640	16.639
3	15:41:00	0.08	1.2	67.920	0.283	97	68	62	3.0	1.680	16.639
4	15:43:30	0.08	1.2	69.580	0.283	97	69	62	3.0	1.650	16.639
5	15:46:00	0.07	1.05	71.230	0.265	98	70	62	3.0	1.550	15.585
6	15:48:30	0.07	1.05	72.780	0.265	98	70	62	3.0	1.550	15.585
7	15:51:00	0.07	1.05	74.330	0.265	98	70	62	3.0	1.550	15.585
8	15:53:30	0.07	1.05	75.880	0.265	98	70	62	3.0	1.550	15.585
9	15:56:00	0.07	1.05	77.430	0.265	99	70	62	3.0	1.550	15.585
10	15:58:30	0.07	1.05	78.98	0.265	98	70	63	3.0	1.550	15.585
11	16:01:00	0.08	1.2	80.63	0.283	99	70	63	3.0	1.650	16.639
12	16:03:30	0.08	1.2	82.18	0.283	98	70	63	3.0	1.680	16.639
	16:06:00			83.86							

Test Run 3

Customer: Nacme Steel Processing, LLC
Plant: Chicago Facility
Location: HCl Scrubber Exhaust Stack

Date: 12/21/06
Start Time: 16:49
End Time: 17:55

DRY GAS METER CONDITIONS

ΔH:	1.20	In. H_2O
Meter Temperature, Tm:	63.8	°F
Sqrt ΔP:	0.283	In. H_2O
Stack Temperature, Ts:	97.6	°F
Meter Volume, Vm:	39.558	cf
Meter Volume, Vmstd:	38.904	dscf
Meter Volume, Vwstd:	2.317	wscf
Isokinetic Variance:	90.6	%I

Sample Train Leak Checks

Pre	0	ft3 @	10	In Hg.
Post	0.005	ft3 @	5	In Hg.

Pitot Leak Checks

Pre	yes	Performed Leak Check @ 3 in. H2O?
Post	yes	

STACK CONDITIONS

Barometric Pressure (Pb):	29.40	in. Hg.
Static Pressure:	0.40	In. H_2O
Flue Pressure (Ps):	29.43	In. Hg. abs.
Carbon Dioxide:	0	%
Oxygen:	20.9	%
Nitrogen:	79.1	%
Gas Weight dry, Md:	28.836	lb/lb mole
Gas Weight wet, Ms:	28.227	lb/lb mole
Excess Air:	—	%
Gas Velocity, Vs:	18.664	fps
Volumetric Flow:	7,068	acfm
Volumetric Flow:	6,212	dscfm
Volumetric Flow:	6,582	scfm

MOISTURE DETERMINATION

Initial Impinger Content:	2867.2	ml	Silica Initial Wt.	839.2	grams
Final Impinger Content:	2908	ml	Silica Final Wt.	847.6	grams
Difference:	40.8		Difference:	8.4	

Total Water Gain: 49.2 Moisture, Bws: 0.056 Supersaturation Value, Bws: 0.061*

Port-Point No.	Clock Time	Velocity Head Δp In. H2O	Orifice ΔH In. H2O	Actual Meter Vol. ft³	Sqrt. Δp	Stack Temp °F	Meter Temp Inlet °F	Meter Temp Outlet °F	Pump Vacuum In. Hg	Collected Vol. ft³	Point Vel ft/sec
1-1	16:49:00	0.07	1.04	84.07	0.265	95	60	60	3.0	1.543	15.567
2	16:51:30	0.07	1.04	85.61	0.265	95	62	60	3.0	1.530	15.567
3	16:54:00	0.07	1.04	87.14	0.265	95	64	60	3.0	1.540	15.567
4	16:56:30	0.07	1.04	88.68	0.265	96	65	60	3.0	1.540	15.567
5	16:59:00	0.07	1.04	90.22	0.265	97	66	60	3.0	1.530	15.567
6	17:01:30	0.07	1.04	91.75	0.265	98	66	60	3.0	1.540	15.567
7	17:04:00	0.07	1.04	93.29	0.265	98	67	60	3	1.530	15.567
8	17:06:30	0.08	1.19	94.82	0.283	99	67	60	3	1.650	16.641
9	17:09:00	0.08	1.19	96.47	0.283	99	67	60	3	1.640	16.641
10	17:11:30	0.09	1.34	98.11	0.300	100	68	61	3	1.740	17.651
11	17:14:00	0.09	1.34	99.85	0.300	100	68	61	3	1.740	17.651
12	17:16:30	0.09	1.34	101.59	0.300	100	68	61	3	1.760	17.651
	17:19:00			103.35							
2-1	17:25:00	0.08	1.19	103.35	0.283	95	65	61	3	1.680	16.641
2	17:27:30	0.08	1.19	105.01	0.283	97	66	61	3	1.680	16.641
3	17:30:00	0.09	1.34	106.64	0.300	97	67	61	3	1.740	17.651
4	17:32:30	0.09	1.34	108.38	0.300	96	66	61	3	1.740	17.651
5	17:35:00	0.09	1.34	110.12	0.300	97	68	61	3	1.750	17.651
6	17:37:30	0.08	1.19	111.87	0.283	97	68	61	3	1.640	16.641
7	17:40:00	0.08	1.19	113.51	0.283	98	69	61	3	1.640	16.641
8	17:42:30	0.08	1.19	115.15	0.283	98	69	61	3	1.640	16.641
9	17:45:00	0.08	1.19	116.79	0.283	99	70	61	3	1.640	16.641
10	17:47:30	0.08	1.19	118.43	0.283	99	70	61	3	1.660	16.641
11	17:50:00	0.09	1.34	120.09	0.300	99	70	61	3	1.730	17.651
12	17:52:30	0.09	1.34	121.82	0.300	99	70	62	3	1.805	17.651
	17:55:00			123.625							

Test Run 4

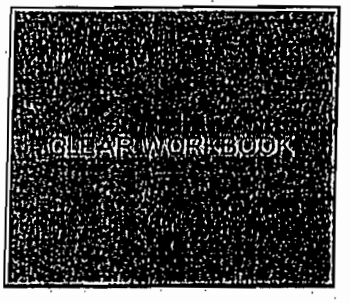
Customer: Nacme Steel Processing, LLC
Plant: Chicago Facility
Location: HCl Scrubber Exhaust Stack

Number of Analytes: 1

		Run 1	Run 2	Run 3	Run 4
Identify Analyte:	HCl				
Molecular Weight:	36.461				
mg (net) collected:			0.02	0.02	0.02

Customer: Nacme Steel Processing, LLC
Plant: Chicago Facility
Test Location: HCl Scrubber Exhaust Stack

Test Engineer:	DT	
Temp ID:	CM13	
Meter ID:	CM13	
Pitot ID:	038A	
Pitot Tube Coefficient:	0.840	
Probe Length:	4.0	ft
Probe Liner Material:	Glass	
Nozzle Diameter:	0.374	in.
Meter Calibration Factor:	0.990	
Sample Plane:	Horizontal	
Port Length:	5.00	in.
Port Size (diameter):	4.00	in.
Port Type:	Flange	
Duct Shape:	Circular	
Diameter	3	ft
Duct Area:	7.069	Sq. Ft.
Number of Ports Sampled:	2	
Number of Points per Port:	12	
Minutes per Point:	2.5	
otal Number of Traverse Points:	24	
Test Length:	60	min.
Train Type:	Anderson Box	
Source Condition:	Maximum	
# of Runs	4	



PLATT ENVIRONMENTAL SERVICES, INC.

Procedures for Calibration

Nozzles

The nozzles are measured according to Method 5, Section 5.1.

Dry Gas Meters

The test meters are calibrated according to Method 5, Section 5.3 and "Procedures for Calibrating and Using Dry Gas Volume Meters as Calibration Standards" by P.R. Westlin and R.T. Shigehara, March 10, 1978.

Analytical Balance

The accuracy of the analytical balance is checked with Class S, Stainless Steel Type 303 weights manufactured by F. Hopken and Son, Jersey City, New Jersey.

Temperature Sensing Devices

The potentiometer and thermocouples are calibrated utilizing a NBS traceable millivolt source.

Pitot Tubes

The pitot tubes utilized during this test program are manufactured according to specifications described and illustrated in the *Code of Federal Regulations*, Title 40, Part 60, Appendix A, Methods 1 and 2. The pitot tubes comply with the alignment specifications in Method 2, Section 4; and the pitot tube assemblies are in compliance with specifications in the same section.

METER BOX CALIBRATION

Dry Gas Meter No.	CM13	Date:	December 8, 2006
Standard Meter No.	9605804	Calibrated By:	J. Robertson
Standard Meter (Yr)	1.0054	Barometric Pressure :	29 65

Run Number		Orifice Setting in H20 Chg (H)	Standard Meter Gas Volume Vr	Dry Meter Gas Volume Vd	Standard Meter Temp. F tr	Dry Gas Meter Inlet Temp. F tdi	Dry Gas Meter Outlet Temp. F tdo	Dry Gas Meter Avg. Temp. F td	Time Min.	Time Sec.	Y	Chg (H@)
Final			960.756	794.053	68	74	72					
Inital			955.375	788.566	68	75	72					
Difference	1	0.20	5.381	5.487	68	75	72	73	19	32	0.990	1.472
Final			966.622	800.020	67	76	73					
Inital			960.963	794.236	68	74	72					
Difference	2	0.50	5.659	5.784	68	75	73	74	13	30	0.989	1.585
Final			971.911	805.432	68	78	73					
Inital			966.848	800.241	68	75	73					
Difference	3	0.70	5.063	5.191	68	77	73	75	10	10	0.986	1.572
Final			977.315	810.933	68	79	74					
Inital			972.226	805.728	68	77	73					
Difference	4	0.90	5.089	5.205	68	78	74	76	9	14	0.990	1.647
Final			983.741	817.473	68	81	74					
Inital			977.493	811.102	68	77	74					
Difference	5	1.20	6.248	6.371	68	79	74	77	9	42	0.994	1.606
Final			955.241	788.414	67	81	72					
Inital			949.459	782.508	67	81	71					
Difference	6	2.00	5.782	5.906	67	81	72	76	7	8	0.991	1.684
									Average		0.990	1.594

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

EPA Control Module Number: CM13 Name: J. Robertson

Ambient Temperature: 67.6 °F Date: December 8, 2006

Omega Engineering Calibrator Model No. CL23A Serial # T-249465

Date Of Calibration Verification: September 22, 2006

Primary Standards Directly Traceable to National Institute of Standards and Technology (NIST)

Reference[a] Source Temperature, (°F)	Test Thermometer Temperature, (°F)	Temperature Difference, %
0	5	1.1
250	255	0.7
600	604	0.4
1200	1206	0.4

$$\frac{(\text{Ref. Temp., °F} + 460) - (\text{Test Therm. Temp., °F} + 460)}{\text{Ref. Temp., °F} + 460} * 100 <= 1.5\ \%$$

METER BOX CALIBRATION

Dry Gas Meter No.	CM13	Date:	December 28, 2006
Standard Meter No.	9605804	Calibrated By:	S. Dyra
Standard Meter (Yr)	1.0054	Barometric Pressure :	29.41

Run Number		Orifice Setting in H20 Chg (H)	Standard Meter Gas Volume Vr	Dry Meter Gas Volume Vd	Standard Meter Temp. F tr	Dry Gas Meter Inlet Temp. F tdi	Dry Gas Meter Outlet Temp. F tdo	Dry Gas Meter Avg. Temp. F td	Time Min.	Time Sec.	Y	Chg (H@)
Final			252.256	246.210	68	74	72					
Inital			247.170	241.100	68	72	70					
Difference	1	0.20	5.086	5.110	68	73	71	72	18	38	1.002	1.515
Final			257.854	251.825	68	77	73					
Inital			252.559	246.491	68	74	72					
Difference	2	0.50	5.295	5.334	68	76	73	74	12	32	1.003	1.575
Final			263.319	257.339	68	79	74					
Inital			258.209	252.181	68	76	73					
Difference	3	0.70	5.110	5.158	68	78	74	76	10	23	1.003	1.621
Final			268.850	262.922	68	80	75					
Inital			263.714	257.726	68	77	74					
Difference	4	0.90	5.136	5.196	68	79	75	77	9	3	1.002	1.564
Final			274.516	268.665	68	82	76					
Inital			269.475	263.555	68	79	75					
Difference	5	1.20	5.041	5.110	68	81	76	78	7	48	1.002	1.604
Final			246.829	240.739	67	76	69					
Initnl			241.638	235.573	67	74	69					
Difference	6	2.00	5.191	5.166	67	75	69	72	6	15	1.009	1.630
										Average	1.004	1.585

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

EPA Control Module Number: CM13 Name: S. Dyra

Ambient Temperature: 66.3 °F Date: December 28, 2006

Omega Engineering Calibrator Model No. CL23A Serial # T-249465

Date Of Calibration Verification: September 22, 2006

Primary Standards Directly Traceable to National Institute of Standards and Technology (NIST)

Reference Source Temperature, (°F)	Test Thermometer Temperature, (°F)	Temperature Difference, %
0	4	0.9
250	254	0.6
600	603	0.3
1200	1205	0.3

$$\frac{(\text{Ref. Temp., °F} + 460) - (\text{Test Therm. Temp., °F} + 460)}{\text{Ref. Temp., °F} + 460} * 100 <= 1.5\ \%$$

Platt Environmental Services, Inc.

371 Balm Court
Wood Dale, IL 60191
630-521-9400
630-521-9494 fax

Nozzle Calibration Sheet
Set No. 2 Glass

Nominal Diameter	0.120	0.175	0.200	0.250	0.275	0.300	0.310	0.375	0.425	0.500	Other
Nozzle Diameter			0.198	0.251	0.269		0.312	0.374	0.431	0.500	
Nozzle Identification Number											

TYPE S PITOT TUBE INSPECTION DATA FORM

Pitot tube assembly level? Y yes _____ no

Pitot tube openings damaged? _____ yes (explain below) N no

α_1 = 3 °(<10°), α_2 = 0 °(<10°) z = A sin γ = 0.000 (in.); (<0.125 in.)

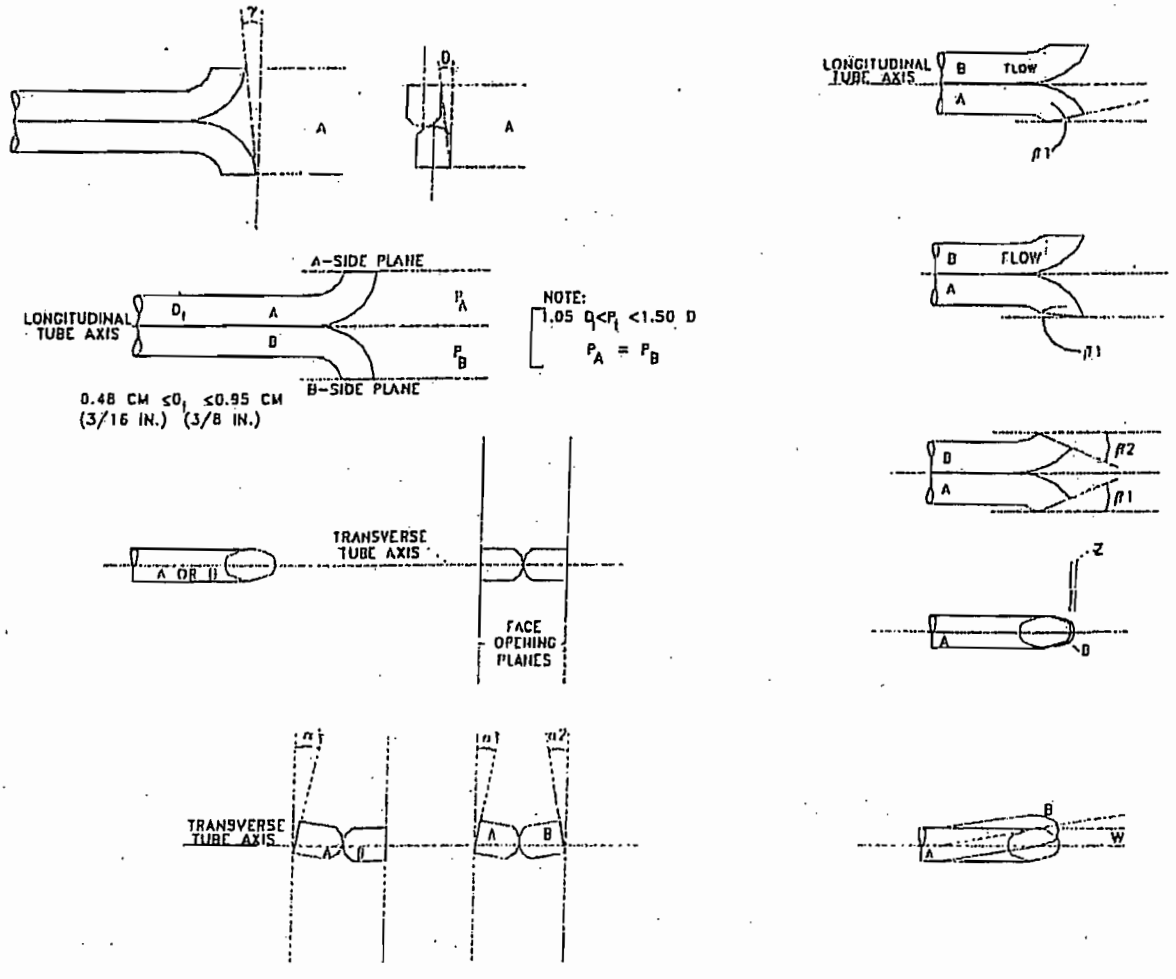
β_1 = 1 °(<5°), β_2 = 1 °(<5°) w = A sin θ = 0.019 (in.); (<0.03125 in.)

γ = 0 °, θ = 1 °, A = 1.077 (in.) P_A = 0.54 (in.), P_B = 0.54 (in.), D_t = _____ (in.)

Comments: _____

Calibration required? _____ yes N no

Pitot Tube No.: 38 Date: 12/18/2006 Name: AAS



TYPE S PITOT TUBE INSPECTION DATA FORM

Pitot tube assembly level? Y yes _____ no

Pitot tube openings damaged? _____ yes (explain below) N no

α_1 = 3 °(<10°), α_2 = 0 °(<10°) z = A sin γ = 0.000 (in.); (<0.125 in.)

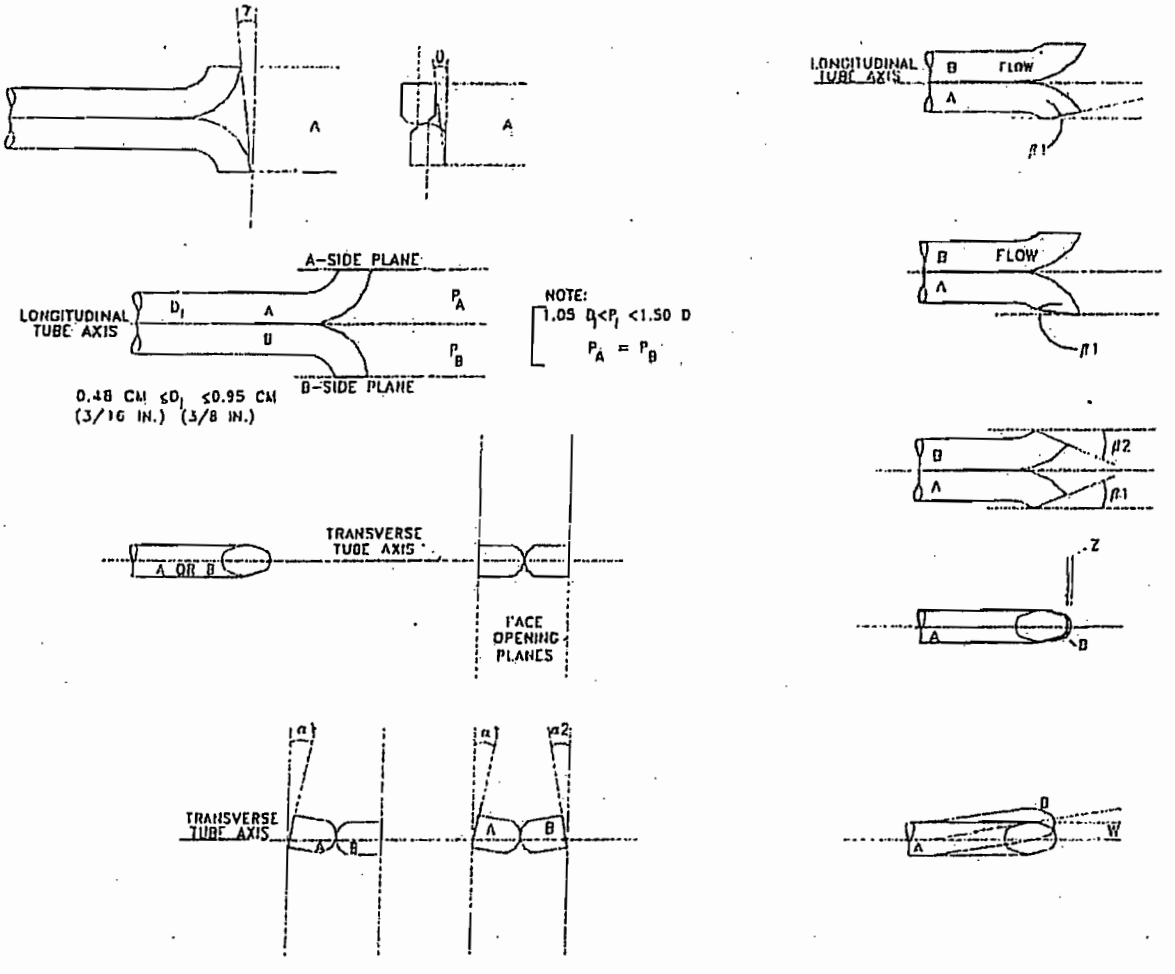
β_1 = 1 °(<5°), β_2 = 1 °(<5°) w = A sin θ = 0.019 (in.); (<0.03125 in.)

γ = 0 °, θ = 1 °, A = 1.077 (in.) P_A = 0.54 (in.), P_B = 0.54 (in.), D_t = _____ (in.)

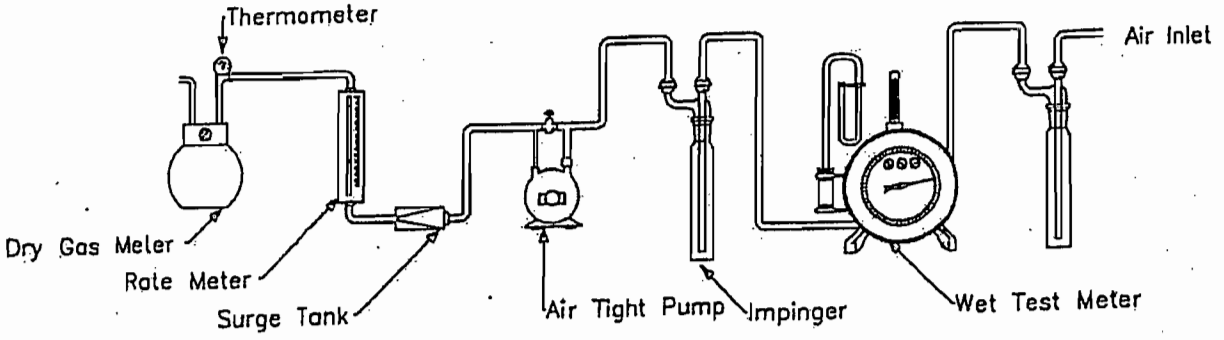
Comments: _____

Calibration required? _____ yes N no

Pitot Tube No.: 38 Date: 12/28/2006 Name: AAS



Dry Gas Meter Calibration Sample Train Diagram



Isokinetic Sampling Cover Sheet

Plant Information

Run Number: 1 Date: 12/21/06 Project Number: PE2006254

Test Location: HCL SCRUBBER EXHAUST STACK Client Name: NACME Plant Name: CHICAGO

Duct Shape: (Circular) or Rectangular Length: ____ Width: ____ or Diameter: 36"

Source Condition: ____ Test Method: 26A Flue Area: 7.069

Port Type: NIPPLE Port Length: 5" Port Size: 4"

Meter and Probe Data

Operator: DAN TUIDER Meter ID: CM13 Meter Y Value: .990

Pitot ID: 038A Pitot Coefficient: .840 Probe Length: 4'

Probe Liner: GLASS Nozzle Diameter: .375 Train Type: ANDERSON

Filter Number/Weight: — Thimble Number/Weight: —

Pre-Test Nozzle Leak Check: NO GOOD @ 10 "Hg Post-Test Nozzle Leak Check: NO GOOD @ "Hg

Pre-Test Pitot Leak Check: ✓ @ 6.1 "H_2O Post-Test Pitot Leak Check: ✓ @ 5.7 "H_2O

Traverse Data

Ports Sampled: 2 Points/Port: 12 Min./Point: 2.5

Total Points: 24 Total Test Time: 60 Sample Plane: (Horizontal) or Vertical

Stack Parameters

Barometric Pressure: 29.4 Static Pressure: 0.4

CO_2 %: 0.0 O_2 %: 20.9 Determined by: Method 3 or (Method 3A)

Initial Imp. Volume or Weight: 3693.6 Final Imp. Volume or Weight: 3744.8 Imp. Volume or Weight Gain: 51.2

Initial Silica Weight: — Final Silica Weight: — Silica Weight Gain: ____

Balance used for impingers and/or silica weights (Model and S/N): ____

Comments:

Isokinetic Sampling Field Data Sheet

Project Number:
Client: NACME STEEL
Plant: CHICAGO
Date: 12/21/06
Test Location: HCL SCRUBBER EXHAUST stack
Test Method: M26A
Test Number: 1
Operator: DAN TUIDER
Page Number: 1 of 1

Port-Point #.	Time	(ΔP)	Orifice Setting (ΔH)	Meter Volume (V_m) ft^3, Actual	Square Root, ΔP	Meter Rate, Cubic Feet/ Min.	Theoretical Meter Volume, (V_m) ft^3, per point	Theoretical Meter Volume, (V_m) ft^3, total	Stack Temp, °F	Meter Temp Inlet, °F	Meter Temp Outlet, °F	Pump Vacuum, "Hg	Probe Temp. °F	Filter Temp. °F	Impinger Outlet Well Temp °F
1-1	1106	.07	.99	71.072	.26	.595	1.487		99	55	55	3	247	256	46
-2	1110:30	.07	.99	72.56	.26	.595	1.487	72.559	98	57	55	3	246	254	46
-3	1113	.07	.99	74.05	.26	.595	1.487	74.046	97	59	56	3	248	255	46
-4	1115:30	.07	.99	75.54	.26	.595	1.487	75.533	97	61	56	3	247	256	47
-5	1118	.07	.99	77.03	.26	.595	1.487	77.020	97	62	56	3	247	255	47
-6	1120:30	.06	.89	78.51	.24	.568	1.421	78.507	97	63	56	3	248	255	46
-7	1123	.06	.89	79.93	.24	.568	1.421	79.928	97	64	57	3	249	255	47
-8	1125:30	.06	.89	81.35	.24	.568	1.421	81.349	98	64	57	3	250	257	47
-9	1128	.06	.89	82.78	.24	.568	1.421	82.770	98	65	57	3	249	256	47
-10	1130:30	.08	.99	84.20	.26	.595	1.487	84.191	99	65	57	3	250	255	47
-11	1133	.08	1.19	85.68	.28	.656	1.640	85.678	99	66	58	3	249	255	48
-12	1135:30	.09	1.34	87.32	.30	.696	1.740	87.318	100	66	58	3	250	255	48
	1138			89.099				89.058							
2-1	1144	.07	.99	89.099	.26	.595	1.487		96	62	58	3	247	255	47
-2	1146:30	.07	.99	90.59	.26	.595	1.487	90.586	96	63	58	3	248	256	47
-3	1149	.08	1.19	92.08	.28	.656	1.640	92.073	96	65	58	3	249	254	47
-4	1151:30	.07	.99	93.72	.26	.595	1.487	93.713	96	65	59	3	251	255	46
-5	1154	.06	.89	95.21	.24	.568	1.421	95.200	96	65	59	3	250	255	46
-6	1156:30	.06	.89	96.63	.24	.568	1.421	96.621	97	65	59	3	251	255	46
-7	1159	.06	.89	98.05	.24	.568	1.421	98.042	98	65	59	3	248	256	47
-8	1201:30	.06	.89	99.47	.24	.568	1.421	99.463	99	66	59	3	249	256	47
-9	1204	.06	.89	100.89	.24	.568	1.421	100.884	99	66	59	3	250	255	47
-10	1206:30	.06	.89	102.31	.24	.568	1.421	102.305	99	66	59	3	248	256	47
-11	1209	.06	.89	103.73	.24	.568	1.421	103.726	99	66	59	3	248	256	48
-12	1211:30	.06	.89	105.15	.24	.568	1.421	105.147	99	66	59	3	251	255	48
	1214			106.572				106.568							
				35.5											

Isokinetic Sampling Cover Sheet

Plant Information

Run Number: 2 | Date: 12/21/06 | Project Number: _____

Test Location: HCL SCRUBBER EXHAUST STACK | Client Name: NUCOR STEEL | Plant Name: CHICAGO, IL

Duct Shape: (Circular) or Rectangular | Length: _____ Width: _____ or | Diameter: 36"

Source Condition: _____ | Test Method: M26A | Flue Area: 7.069

Port Type: NIPPLE | Port Length: 5" | Port Size: 4"

Meter and Probe Data

Operator: DANTUIDER | Meter ID: CM13 | Meter Y Value: .990

Pitot ID: 038A | Pitot Coefficient: .846 | Probe Length: 4

Probe Liner: GLASS | Nozzle Diameter: .374 | Train Type: ANDERSON

Filter Number/Weight: _____ | Thimble Number/Weight: _____

Pre-Test Nozzle Leak Check: 0.000 @ 10 "Hg | Post-Test Nozzle Leak Check: 0.000 @ 5 "Hg

Pre-Test Pitot Leak Check: ✓ (+) 5.4 "H_2O | Post-Test Pitot Leak Check: ✓ (-) 5.5 "H_2O

Traverse Data

Ports Sampled: 2 | Points/Port: 12 | Min./Point: 2.5

Total Points: 24 | Total Test Time: 60 | Sample Plane: (Horizontal) or Vertical

Stack Parameters

Barometric Pressure: 29.4 | Static Pressure: .4

CO_2 %: _____ | O_2 %: _____ | Determined by: Method 3 or Method 3A

Initial Imp. Volume or Weight: 400 | Final Imp. Volume or Weight: _____ | Imp. Volume or Weight Gain: _____

Initial Silica Weight: _____ | Final Silica Weight: _____ | Silica Weight Gain: _____

Balance used for impingers and/or silica weights (Model and S/N): _____

Comments:

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Isokinetic Sampling Field Data Sheet

Project Number: _____ Date: 12/21/06 Test Number: 2

Client: NACME STEEL Test Location: HCL SCRUBBER EXHAUST STACK Operator: DAN TUIDER

Plant: CHICAGO, IL Test Method: M26A Page Number: 1 of 1

Port-Point #.	Time	(ΔP)	Orifice Setting (ΔH)	Meter Volume (V_m) ft^3, Actual	Square Root, ΔP	Meter Rate, Cubic Feet/ Min.	Theoretical Meter Volume, (V_m) ft^3, per point	Theoretical Meter Volume, (V_m) ft^3, total	Stack Temp, °F	Meter Temp Inlet, °F	Meter Temp Outlet, °F	Pump Vacuum, " Hg	Probe Temp. °F	Filter Temp. °F	Impinger Outlet Well Temp °F
1-1	1311	.07	1.04	7.438	.26	.614	1.535		98	58	58	3	249	255	44
-2	1313:30	.07	1.04	8.98	.26	.614	1.535	8.973	99	60	59	3	250	254	42
-3	1316	.07	1.04	10.51	.26	.614	1.535	10.508	100	62	59	3	248	255	42
-4	1318:30	.07	1.04	12.05	.26	.614	1.535	12.043	101	63	59	3	249	255	42
-5	1321	.07	1.04	13.58	.26	.614	1.535	13.578	101	64	59	3	250	254	43
-6	1323:30	.07	1.04	15.12	.26	.614	1.535	15.113	101	65	59	3	249	254	43
-7	1326	.07	1.04	16.65	.26	.614	1.535	16.648	102	66	59	3	248	257	44
-8	1328:30	.08	1.19	18.19	.28	.656	1.640	18.183	103	67	59	3	249	255	45
-9	1331	.08	1.19	19.83	.28	.656	1.640	19.823	103	68	60	3	250	255	45
-10	1333:30	.09	1.34	21.47	.30	.696	1.740	21.463	103	69	60	3	249	255	46
-11	1336	.09	1.34	23.23	.30	.696	1.740	23.203	103	69	60	3	249	255	47
-12	1338:30	.09	1.34	24.95	.30	.696	1.740	24.943	103	69	60	3	248	256	47
	1341			26.731				26.683							
2-1	1347	.06	.89	26.731	.24	.568	1.421		98	65	60	3	249	255	47
-2	1349:30	.06	.89	28.16	.24	.568	1.421	28.152	97	66	60	3	250	255	46
-3	1352	.06	.89	29.58	.24	.568	1.421	29.573	97	66	61	3	248	255	46
-4	1354:30	.07	1.04	31.01	.26	.614	1.535	30.994	97	67	61	3	247	254	46
-5	1357	.07	1.04	32.54	.26	.614	1.535	32.529	97	68	61	3	248	255	46
-6	1359:30	.07	1.04	34.07	.26	.614	1.535	34.064	97	68	61	3	249	255	47
-7	1402	.07	1.04	35.60	.26	.614	1.535	35.599	98	69	61	3	250	255	47
-8	1404:30	.07	1.04	37.14	.26	.614	1.535	37.134	99	69	61	3	250	256	48
-9	1407	.07	1.04	38.67	.26	.614	1.535	38.669	99	70	61	3	249	255	48
-10	1409:30	.07	1.04	40.21	.26	.614	1.535	40.204	100	70	61	3	250	256	48
-11	1412	.07	1.04	41.74	.26	.614	1.535	41.739	101	70	62	3	249	256	48
-12	1414:30	.07	1.04	43.28	.26	.614	1.535	43.274	101	70	62	3	250	256	49
	1417			44.837				44.809							

Isokinetic Sampling Cover Sheet

Plant Information

Run Number: 3 Date: 12/21/06 Project Number: _____

Test Location: HCL SCRUBBER EXHAUST STACK Client Name: NACME STEEL Plant Name: CHICAGO, IL

Duct Shape: (Circular) or Rectangular Length: _____ Width: _____ or Diameter: 36"

Source Condition: _____ Test Method: M 26A Flue Area: 7.069

Port Type: NIPPLE Port Length: 5" Port Size: _____

Meter and Probe Data

Operator: DAN TUTOER Meter ID: CM13 Meter Y Value: .990

Pitot ID: 038A Pitot Coefficient: .840 Probe Length: 4'

Probe Liner: _____ Nozzle Diameter: .374 Train Type: ANDERSON

Filter Number/Weight: _____ Thimble Number/Weight: _____

Pre-Test Nozzle Leak Check: 0.000 @ 10 "Hg Post-Test Nozzle Leak Check: 0.000 @ 5 "Hg

Pre-Test Pitot Leak Check: ✓ @ 5.5 "H_2O Post-Test Pitot Leak Check: ✓ @ 5.1 "H_2O

Traverse Data

Ports Sampled: 2 Points/Port: 12 Min./Point: 2.5

Total Points: 24 Total Test Time: 60 Sample Plane: Horizontal or Vertical

Stack Parameters

Barometric Pressure: 29.4 Static Pressure: -.4

CO_2 %: 0.0 O_2 %: 21.9 Determined by: Method 3 or Method 3A

Initial Imp. Volume or Weight: 400 Final Imp. Volume or Weight: _____ Imp. Volume or Weight Gain: _____

Initial Silica Weight: _____ Final Silica Weight: _____ Silica Weight Gain: _____

Balance used for Impingers and/or silica weights (Model and S/N): _____

Comments:

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Isokinetic Sampling Field Data Sheet

Project Number: _____ Date: 12/21/06 Test Number: 3

Client: NACME STEEL Test Location: HCL SCRUBBER EXHAUST STACK Operator: DAN TUIDER

Plant: CHICAGO, IL Test Method: M26A Page Number: 1 of 1

Port-Point #.	Time	(ΔP)	Orifice Setting (ΔH)	Meter Volume (V_m) ft^3, Actual	Square Root, ΔP	Meter Rate, Cubic Feet/ Min.	Theoretical Meter Volume, (V_m) ft^3, per point	Theoretical Meter Volume, (V_m) ft^3, total	Stack Temp, °F	Meter Temp Inlet, °F	Meter Temp Outlet, °F	Pump Vacuum, " Hg	Probe Temp. °F	Filter Temp. °F	Impinger Outlet Well Temp °F
1-1	1501	.07	1.05	45.563	.26	.620	1.549		96	61	61	3	248	255	48
-2	1503:30	.07	1.05	47.12	.26	.620	1.549	47.112	96	62	61	3	249	256	48
-3	1506	07	1.05	48.67	.26	.620	1.549	48.661	96	64	61	3	250	257	48
-4	1508:30	.07	1.05	50.22	.26	.620	1.549	50.210	97	66	61	3	250	256	48
-5	1511	.07	1.05	51.76	.26	.620	1.549	51.759	98	66	61	3	249	255	48
-6	1513:30	.07	1.05	53.31	.26	.620	1.549	53.308	98	67	61	3	248	256	49
-7	1516	.07	1.05	54.87	.26	.620	1.549	54.857	98	68	61	3	249	255	48
-8	1518:30	.07	1.05	56.41	.26	.620	1.549	56.406	98	68	61	3	250	256	48
-9	1521	.08	1.20	57.97	.28	.662	1.656	57.955	99	69	61	3	251	256	49
-10	1523:30	.08	1.20	59.62	.28	.662	1.656	59.611	99	69	61	3	250	254	49
-11	1526	.08	1.20	61.27	.28	.662	1.656	61.267	99	69	61	3	250	255	49
-12	1528:30	.08	1.20	62.94	.28	.662	1.656	62.923	99	70	62	3	251	256	49
	1531			64.604				64.579							
2-1	1536	.08	1.20	64.604	.28	.662	1.656		95	67	62	3	249	256	50
-2	1538:30	.08	1.20	66.28	.28	.662	1.656	66.260	95	68	62	3	250	255	50
-3	1541	.08	1.20	67.92	.28	.662	1.656	67.916	97	68	62	3	250	255	50
-4	1543:30	.08	1.20	69.58	.28	.662	1.656	69.572	97	69	62	3	251	255	50
-5	1546	.07	1.05	71.23	.26	.620	1.549	71.228	98	70	62	3	253	255	49
-6	1548:30	.07	1.05	72.78	.26	.620	1.549	72.777	98	70	62	3	252	256	49
-7	1551	.07	1.05	74.33	.26	.620	1.549	74.326	98	70	62	3	250	254	50
-8	1553:30	.07	1.05	75.88	.26	.620	1.549	75.875	98	70	62	3	249	255	50
-9	1556	.07	1.05	77.43	.26	.620	1.549	77.424	99	70	62	3	248	256	49
-10	1558:30	.07	1.05	78.98	.26	.620	1.549	78.973	98	70	63	3	250	257	49
-11	1601	.08	1.20	80.53	.28	.662	1.656	80.522	99	70	63	3	251	256	49
-12	1603:30	.08	1.20	82.18	.28	.662	1.656	82.178	98	70	63	3	252	256	49
	1606			83.860				83.834							

Isokinetic Sampling Cover Sheet

Plant Information

Run Number: 4 Date: 12/21/06 Project Number: _____
Test Location: HCL SCRUBBER EXHAUST STACK Client Name: NACME STEEL Plant Name: CHICAGO, IL
Duct Shape: Circular or Rectangular Length: _____ Width: _____ or Diameter: 36"
Source Condition: _____ Test Method: M26A Flue Area: 7.069
Port Type: NIPPLE Port Length: 5" Port Size: 4"

Meter and Probe Data

Operator: DAN TUTOR Meter ID: CM13 Meter Y Value: _____
Pitot ID: 038A Pitot Coefficient: .840 Probe Length: 4'
Probe Liner: GLASS Nozzle Diameter: .374 Train Type: ANDERSON
Filter Number/Weight: _____ Thimble Number/Weight: _____
Pre-Test Nozzle Leak Check: 0.000 @ 60 "Hg Post-Test Nozzle Leak Check: 0.005 @ 5 "Hg
Pre-Test Pitot Leak Check: ✓ @ 5.1 "H_2O Post-Test Pitot Leak Check: ✓ @ 6.0 "H_2O

Traverse Data

Ports Sampled: 2 Points/Port: 12 Min./Point: 2.5
Total Points: 24 Total Test Time: 60 Sample Plane: Horizontal or Vertical

Stack Parameters

Barometric Pressure: 29.4 Static Pressure: .4
CO_2 %: 0.0 O_2 %: 20.9 Determined by: Method 3 or Method 3A
Initial Imp. Volume or Weight: 400 Final Imp. Volume or Weight: _____ Imp. Volume or Weight Gain: _____
Initial Silica Weight: _____ Final Silica Weight: _____ Silica Weight Gain: _____
Balance used for impingers and/or silica weights (Model and S/N): _____

Comments:

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Isokinetic Sampling Field Data Sheet

Project Number:		Date:	12/21/06	Test Number:	4
Client:	NUCOR STEEL	Test Location:	HCL SCRUBBER EXHAUST STACK	Operator:	DAN TOIDER
Plant:	CHICAGO, IL	Test Method:	M26A	Page Number:	1 of 1

Port-Point #.	Time	(ΔP)	Orifice Setting (ΔH)	Meter Volume (V_m) ft³, Actual	Square Root, ΔP	Meter Rate, Cubic Feet/ Min.	Theoretical Meter Volume, (V_m) ft³, per point	Theoretical Meter Volume, (V_m) ft³, total	Stack Temp, °F	Meter Temp Inlet, °F	Meter Temp Outlet, °F	Pump Vacuum, " Hg	Probe Temp. °F	Filter Temp. °F	Impinger Outlet Well Temp °F
1-1	1649	.07	1.04	84.067	.26	.614	1.536		95	60	60	3	250	257	46
-2	1651:30	.07	1.04	85.61	.26	.614	1.536	85.603	95	62	60	3	251	256	45
-3	1654	.07	1.04	87.14	.26	.614	1.536	87.139	95	64	60	3	249	256	45
-4	1656:30	.07	1.04	88.68	.26	.614	1.536	88.675	96	65	60	3	250	254	45
-5	1659	.07	1.04	90.22	.26	.614	1.536	90.211	97	66	60	3	248	256	45
-6	1701:30	.07	1.04	91.75	.26	.614	1.536	91.747	98	66	60	3	249	257	46
-7	1704	.07	1.04	93.29	.26	.614	1.536	93.283	98	67	60	3	250	256	46
-8	1706:30	.08	1.19	94.82	.28	.657	1.642	94.819	99	67	60	3	251	256	47
-9	1709	.08	1.19	96.47	.28	.657	1.642	96.461	99	67	60	3	250	255	48
-10	1711:30	.09	1.34	98.11	.30	.697	1.742	98.103	100	68	61	3	251	256	48
-11	1714	.09	1.34	99.85	.30	.697	1.742	99.845	100	68	61	3	250	256	48
-12	1716:30	.09	1.34	101.59	.30	.697	1.742	101.587	100	68	61	3	249	255	48
	1719			103.350				103.332							
2-1	1725	.08	1.19	103.350	.28	.657	1.642		95	65	61	3	250	256	48
-2	1727:30	.08	1.19	105.01	.28	.657	1.642	104.992	97	66	61	3	251	255	48
-3	1730	.09	1.34	106.64	.30	.697	1.742	106.634	97	67	61	3	249	255	47
-4	1732:30	.09	1.34	108.38	.30	.697	1.742	108.376	96	68	61	3	248	255	47
-5	1735	.09	1.34	110.12	.30	.697	1.742	110.118	97	68	61	3	249	255	48
-6	1737:30	.08	1.19	111.87	.28	.657	1.642	111.186	97	68	61	3	250	256	49
-7	1740	.08	1.19	113.51	.28	.657	1.642	113.502	98	69	61	3	251	256	49
-8	1742:30	.08	1.19	115.15	.28	.657	1.642	115.144	98	69	61	3	249	255	49
-9	1745	.08	1.19	116.79	.28	.657	1.642	116.786	99	70	61	3	250	255	49
-10	1747:30	.08	1.19	118.43	.28	.657	1.642	118.428	99	70	61	3	251	256	50
-11	1750	.09	1.34	120.09	.30	.697	1.742	120.070	99	70	61	3	250	255	50
-12	1752:30	.09	1.34	121.82	.30	.697	1.742	121.812	99	70	62	3	249	257	50
	1755			123.625				123.554							

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 13
MARCH 23, 2007 NACME'S CHANGE REQUEST FOR FESOP APPLICATION ("2007 FESOP APPLICATION")

March 23, 2007

Mr. Valeriy Brodsky
Division of Air Pollution Control
Permit Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

Re: Change Request for FESOP Application
NACME Steel Processing, LLC I.D. No.: 031600FWL

Dear Mr. Brodsky:

Per our discussion, the purpose of this correspondence is to request a revision to the proposed raw material usage limitation for the Federally Enforceable State Operating Permit application (FESOP) for the NACME Steel Processing, LLC facility located at 429 West 127th Street in Chicago, Illinois (the facility).

Currently, the construction permit-revised, issued April 11, 2002, allows the facility a throughput process rate of 85.6 tons of steel per hour. The stack test conducted in 2002 was conducted at a throughput process rate of 33.3 tons of steel per hour. If nothing else was done at this point, the facility has been informed that the pending FESOP will be written for a throughput process rate of 33.3 tons of steel per hour based upon the 2002 stack testing program results.

Therefore, on December 21, 2006, another stack test, was performed at the facility for the purpose of demonstrating compliance with applicable emission at high process rates to obtain a proposed increase in the allowable steel process rate on the current FESOP from proposed 33.3 tons per hour to meet or exceed that of the Construction Permit—Revised, rate of 85.6 tons per hour.

United States Environmental Protection Agency test Method 26A was used to determine stack gas HCl concentrations on the ports after the stack scrubber. The results of this stack test were submitted to the Illinois Environmental Protection Agency (IEPA), Compliance and Enforcement Section in duplicate on January 25, 2007. This stack test was not done at the request of the IEPA for compliance issues.

The results of the December 2006 stack test demonstrated that the facility could process an average throughput rate of 119.9983 tons of steel per hour (see enclosed summary of NACME Stack Test Results) while maintaining compliance with the National Emission

Standards for Hazardous Air Pollutants (NESHAPS) for steel pickling operations outlined in 40 Code of Federal Regulations part 63 , subpart CCC, § 63.1157 (40 CFR 63) and all other operating parameters including:

- Maximum HCl concentration in the pickling tanks of 16%
- Maximum pickling solution temperature of 190° F
- HCl makeup rate of no more than 236 gallons/hour

The gaseous emissions of the stack exhaust were measured to be below 0.01 parts per million by volume (ppmv) of HCl at the outlet of the stack scrubber; well below the permissible level of 18 ppmv, pursuant to 40 CFR 63.

Based on the December 2006 stack test results included in the submitted documents to the IEPA, the facility would like to request that the pending FESOP application be amended to allow the facility to process steel on the pickling line at a process throughput rate of 119 tons of steel per hour.

Enclosed please find the completed 197 CAAPP and 292 CAAPP forms and a check in the amount of $2,000.00 made payable to the Illinois Environmental Protection Agency as part of the 197 CAAPP application fee determination.

If you have any questions, or need additional information, please contact our environmental consultant, Mr. David Osadjan at 630-993-2145.

Sincerely,

NACME STEEL PROCESSING, LLC

John DuBrock
Director of Operations

Enclosures:
197 CAAPP
292 CAAPP
Fee Remittance for 197 CAAPP
NACME Stack Test Results

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

FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION

FOR AGENCY USE ONLY	
ID NUMBER	
PERMIT #	
COMPLETE ☐ INCOMPLETE ☐	DATE COMPLETE:
CHECK #	ACCOUNT NAME:

THIS FORM IS TO BE USED BY ALL SOURCES TO SUPPLY FEE INFORMATION THAT MUST ACCOMPANY ALL CONSTRUCTION PERMIT APPLICATIONS. THIS APPLICATION MUST INCLUDE PAYMENT IN FULL TO BE DEEMED COMPLETE. MAKE CHECK OR MONEY ORDER PAYABLE TO THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY. SEND TO THE ADDRESS ABOVE. DO NOT SEND CASH. REFER TO INSTRUCTIONS (197-INST) FOR ASSISTANCE.

SOURCE INFORMATION

1) SOURCE NAME: NACME ***Steel Processing, LLC***

2) PROJECT NAME: ***Change request for construction permit- revised and FESOP based on stack test results.***

3) SOURCE ID NO. (IF APPLICABLE) ***031600FWL***

FEE DETERMINATION

4) FILL IN THE FOLLOWING THREE BOXES AS DETERMINED IN SECTIONS 1 THROUGH 4 BELOW:

$ 0	+	$ 2,000.00	=	$ 2,000.00
SECTION 1 SUBTOTAL		SECTION 2, 3 OR 4 SUBTOTAL		GRAND TOTAL

SECTION 1. STATUS OF SOURCE/PURPOSE OF SUBMITTAL

5) YOUR APPLICATION WILL FALL UNDER ONLY ONE OF THE FOLLOWING SIX CATEGORIES DESCRIBED BELOW. CHECK THE BOX THAT APPLIES, ENTER THE CORRESPONDING FEE IN THE BOX TO THE RIGHT AND COPY THIS FEE INTO THE SECTION 1 SUBTOTAL BOX ABOVE. PROCEED TO APPLICABLE SECTIONS.

FOR THE PURPOSES OF THIS FORM:

- ***MAJOR SOURCE*** IS A SOURCE THAT IS REQUIRED TO OBTAIN A CAAPP PERMIT
- ***SYNTHETIC MINOR SOURCE*** IS A SOURCE THAT HAS TAKEN LIMITS ON POTENTIAL TO EMIT IN A PERMIT TO AVOID CAAPP PERMIT REQUIREMENTS (E.G., FESOP)
- ***NON-MAJOR SOURCE*** IS A SOURCE THAT IS NOT A MAJOR OR SYNTHETIC MINOR SOURCE

☒	EXISTING SOURCE WITHOUT STATUS CHANGE OR WITH STATUS CHANGE FROM SYNTHETIC MINOR TO MAJOR SOURCE OR VICE VERSA. ENTER $0 AND PROCEED TO SECTION 2.	$ *0* SECTION 1 SUBTOTAL
☐	EXISTING NON-MAJOR SOURCE THAT WILL BECOME SYNTHETIC MINOR OR MAJOR SOURCE. ENTER $5,000 AND PROCEED TO SECTION 4.	
☐	EXISTING MAJOR OR MINOR SOURCE THAT WILL BECOME NON-MAJOR SOURCE. ENTER $4,000 AND PROCEED TO SECTION 3.	
☐	NEW MAJOR OR SYNTHETIC MINOR SOURCE. ENTER $5,000 AND PROCEED TO SECTION 4.	
☐	NEW NON-MAJOR SOURCE. ENTER $500 AND PROCEED TO SECTION 3.	
☐	AGENCY ERROR. IF THIS IS A TIMELY REQUEST TO CORRECT AN ISSUED PERMIT THAT INVOLVES ONLY AN AGENCY ERROR AND IF THE REQUEST IS RECEIVED WITHIN THE DEADLINE FOR A PERMIT APPEAL TO THE POLLUTION CONTROL BOARD, THEN ENTER $0. SKIP SECTIONS 2, 3 AND 4. PROCEED DIRECTLY TO SECTION 5	

SECTION 2. SPECIAL CASE FILING FEE

6) FILING FEE. IF THE APPLICATION ONLY ADDRESSES ONE OR MORE OR THE FOLLOWING, CHECK THE APPROPRIATE BOXES, ENTER $500 IN THE SECOND BOX UNDER FEE DETERMINATION ABOVE, SKIP SECTIONS 3 AND 4 AND PROCEED DIRECTLY TO SECTION 5. OTHERWISE, PROCEED TO SECTION 3 OR 4, AS APPROPRIATE.

- ☐ ADDITION OR REPLACEMENT OF CONTROL DEVICES ON PERMITTED UNITS
- ☐ PILOT PROJECTS/TRIAL BURNS BY A PERMITTED UNIT
- ☐ APPLICATIONS ONLY INVOLVING INSIGNIFICANT ACTIVITIES UNDER 35 IAC 201.210 (MAJOR SOURCES ONLY)
- ☐ LAND REMEDIATION PROJECTS
- ☐ REVISIONS RELATED TO METHODOLOGY OR TIMING FOR EMISSION TESTING
- ☐ MINOR ADMINISTRATIVE-TYPE CHANGE TO A PERMIT

THIS AGENCY IS AUTHORIZED TO REQUIRE AND YOU MUST DISCLOSE THIS INFORMATION UNDER 415 ILCS 5/39. FAILURE TO DO SO COULD RESULT IN THE APPLICATION BEING DENIED AND PENALTIES UNDER 415 ILCS ET SEQ. IT IS NOT NECESSARY TO USE THIS FORM IN PROVIDING THIS INFORMATION. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

SECTION 3: FEES FOR CURRENT OR PROJECTED NON-MAJOR SOURCES	
7) IF THIS APPLICATION CONSISTS OF A SINGLE NEW EMISSION UNIT OR MORE THAN TWO MODIFIED EMISSION UNITS, ENTER $500.	7) 0.00
8) IF THIS APPLICATION CONSISTS OF MORE THAN ONE NEW EMISSION UNIT OR MORE THAN TWO MODIFIED UNITS, ENTER $1,000.	8) 0.00
9) IF THIS APPLICATION CONSISTS OF A NEW SOURCE OR EMISSION UNIT SUBJECT TO SECTION 39.2 OF THE ACT (I.E., LOCAL SITING REVIEW); A COMMERCIAL INCINERATOR OR A MUNICIPAL WASTE, HAZARDOUS WASTE, OR WASTE TIRE INCINERATOR; A COMMERCIAL POWER GENERATOR; OR AN EMISSION UNIT DESIGNATED AS A COMPLEX SOURCE BY AGENCY RULEMAKING; ENTER $15,000.	9) 0.00
10) IF A PUBLIC HEARING IS HELD (SEE INSTRUCTIONS), ENTER $10,000.	10) 0.00
11) SECTION 3 SUBTOTAL (ADD LINES 7 THROUGH 10) TO BE ENTERED ON PAGE 1.	11) 0.00

SECTION 4: FEES FOR CURRENT OR PROJECTED MAJOR OR SYNTHETIC MINOR SOURCES			
Application Contains Modified Emission Units Only	12) FOR THE FIRST MODIFIED EMISSION UNIT, ENTER $2,000.	12) 2,000.00	
	13) NUMBER OF ADDITIONAL MODIFIED EMISSION UNITS = _____ X $1,000.	13)	
	14) LINE 12 PLUS LINE 13, OR $5,000, WHICHEVER IS LESS.		14) 2,000.00
Application Contains New And/Or Modified Emission Units	15) FOR THE FIRST NEW EMISSION UNIT, ENTER $4,000.	15)	
	16) NUMBER OF ADDITIONAL NEW AND/OR MODIFIED EMISSION UNITS = _____ X $1,000.	16)	
	17) LINE 15 PLUS LINE 16, OR $10,000, WHICHEVER IS LESS.		17) 0.00
Application Contains Netting Exercise	18) NUMBER OF INDIVIDUAL POLLUTANTS THAT RELY ON A NETTING EXERCISE OR CONTEMPORANEOUS EMISSIONS DECREASE TO AVOID APPLICATION OF PSD OR NONATTAINMENT NSR = _____ X $3,000.		18) 0.00
Additional Supplemental Fees	19) IF THE NEW SOURCE OR EMISSION UNIT IS SUBJECT TO SECTION 39.2 OF THE ACT (I.E., SITING); A COMMERCIAL INCINERATOR OR OTHER MUNICIPAL WASTE, HAZARDOUS WASTE OR WASTE TIRE INCINERATOR; A COMMERCIAL POWER GENERATOR; OR ONE OR MORE OTHER EMISSION UNITS DESIGNATED AS A COMPLEX SOURCE BY AGENCY RULEMAKING, ENTER $25,000.		19) 0.00
	20) IF THE SOURCE IS A NEW MAJOR SOURCE SUBJECT TO PSD, ENTER $12,000		20) 0.00
	21) IF THE PROJECT IS A MAJOR MODIFICATION SUBJECT TO PSD, ENTER $6,000.		21) 0.00
	22) IF THIS IS A NEW MAJOR SOURCE SUBJECT TO NONATTAINMENT (NAA) NSR, ENTER $20,000.		22) 0.00
	23) IF THIS IS A MAJOR MODIFICATION SUBJECT TO NAA NSR, ENTER $12,000.		23) 0.00
	24) IF APPLICATION INVOLVES A DETERMINATION OF CLEAN UNIT STATUS AND THEREFORE IS NOT SUBJECT TO BACT OR LAER, ENTER $5,000 PER UNIT FOR WHICH A DETERMINATION IS REQUESTED OR OTHERWISE REQUIRED. _____ X $5,000.		24) 0.00
	25) IF APPLICATION INVOLVES A DETERMINATION OF MACT FOR A POLLUTANT AND THE PRODUCT IS NOT SUBJECT TO BACT OR LAER FOR THE RELATED POLLUTANT UNDER PSD OR NSR (E.G., VOM FOR ORGANIC HAP), ENTER $5,000 PER UNIT FOR WHICH A DETERMINATION IS REQUESTED OR OTHERWISE REQUIRED. _____ X $5,000.		25) 0.00
	26) IF A PUBLIC HEARING IS HELD (SEE INSTRUCTIONS), ENTER $10,000.		26) 0.00
27) SECTION 4 SUBTOTAL (ADD LINES 14 AND LINES 17 THROUGH 26) TO BE ENTERED ON PAGE 1.			27) 2,000.00

SECTION 5: CERTIFICATION

NOTE: APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED INCOMPLETE.

28) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE INFORMATION CONTAINED IN THIS FEE APPLICATION IS TRUE, ACCURATE AND COMPLETE.

BY: _____ (SIGNATURE)

Director of Operations (TITLE OF SIGNATORY)

John DuBrock (TYPED OR PRINTED OF SIGNATORY)

/ / (DATE)

APPLICATION PAGE _____-2

197-FEE

NMLP 0417

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

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

FEE DETERMINATION FOR CAAPP PERMIT

FOR AGENCY USE ONLY
ID NUMBER:
PERMIT #:
DATE:

THE DATA PROVIDED ON THIS FORM WILL BE USED TO DETERMINE THE PERMIT FEE. THE EMISSION LEVELS STATED ON THIS FORM CAN ONLY BE USED FOR THE PURPOSE OF PERMIT FEE DETERMINATION IF THE APPLICANT IS WILLING TO ACCEPT THESE LEVELS AS PERMIT SPECIAL CONDITIONS. EMISSIONS DATA PROVIDED ON THIS FORM MUST BE IDENTICAL TO DATA IN THE "PERMITTED EMISSION RATE" COLUMNS PROVIDED ON THE DATA AND INFORMATION FORM FOR INDIVIDUAL EMISSION UNITS OR CONTROL EQUIPMENT. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS 292-1.

SOURCE INFORMATION

1) SOURCE NAME: ***NACME Steel Processing, LLC***

2) DATE FORM PREPARED: ***March 16, 2007***

3) SOURCE ID NO. (IF KNOWN): ***031600FWL***

FEE DATA

4) WILL THE SOURCE PAY THE MAXIMUM FEE OF $250,000.00 PER YEAR? ☐ YES ☒ NO

IF YES, THE REMAINDER OF THIS FORM DOES NOT NEED TO BE COMPLETED.

5) EMISSION UNIT*	NITROGEN OXIDES (NO_X) (TONS/YR)	PARTICULATE MATTER (PART) (TONS/YR)	SULFUR DIOXIDE (SO_2) (TONS/YR)	VOLATILE ORGANIC MATERIAL (VOM) (TONS/YR)	OTHER** SPECIFY ***HAP*** ***Hydrogen Chloride*** (TONS/YR)
01-Steel Pickling Line					***1.8***
Boiler 1	***2.93***	***0.22***	***0.02***	***0.16***	
Boiler 2	***2.93***	***0.22***	***0.02***	***0.16***	
HCL ASTs					***0.44***

*EMISSION UNIT - PROVIDE THE NAME AND FLOW DIAGRAM DESIGNATION OF THE EMISSION UNIT AS IT APPEARS ON THE DATA AND

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

FOR APPLICANT'S USE
_____

INFORMATION FORM.

**OTHER - ANY HAZARDOUS AIR POLLUTANT (HAP) NOT INCLUDED ELSEWHERE, E.G., CHLORINE, HCl, ETC.

5) (CONTINUED) EMISSION UNIT*	NITROGEN OXIDES (NO_X) (TONS/YR)	PARTICULATE MATTER (PART) (TONS/YR)	SULFUR DIOXIDE (SO_2) (TONS/YR)	VOLATILE ORGANIC MATERIAL (VOM) (TONS/YR)	OTHER** SPECIFY _____ (TONS/YR)

*EMISSION UNIT - PROVIDE THE NAME AND FLOW DIAGRAM DESIGNATION OF THE EMISSION UNIT AS IT APPEARS ON THE DATA AND INFORMATION FORM.

**OTHER - ANY HAZARDOUS AIR POLLUTANT (HAP) NOT INCLUDED ELSEWHERE, E.G., CHLORINE, HCl, ETC.

6) SUBTOTAL	*5.86*	*0.44*	*0.04*	*0.32*	*2.24*
7) FUGITIVE	*0*	*0*	*0*	*0*	*0*
8) TOTAL	*5.86*	*0.44*	*0.04*	*0.32*	*2.24*

9) GRAND TOTAL - ADD BOXES *A* THROUGH *E* (TONS/YR):	*8.9*
10) CALCULATED PERMIT FEE - IF GRAND TOTAL IN ITEM 9 ABOVE IS > 100 TONS/YR THEN MULTIPLY GRAND TOTAL BY $18.00 AND ENTER, OTHERWISE ENTER $1,800.00:	*$1,800*
11) MINIMUM PERMIT FEE IS $1,800.00 PER YEAR - MAXIMUM PERMIT FEE IS $250,000.00 PER YEAR. IF THE CALCULATED PERMIT FEE IN ITEM 10 ABOVE IS BETWEEN THESE TWO FEE AMOUNTS THEN ENTER HERE, OTHERWISE ENTER THE MINIMUM OR MAXIMUM PERMIT FEE, WHICHEVER IS APPLICABLE. THIS IS THE ACTUAL ANNUAL PERMIT FEE:	*$1,800*

NACME Steel Processing, LLC
ID #: 031600FWL

Hydrogen Chloride Emissions Stack Test Results
NPC - 1 Stack test 12/21/06

	1ST TEST	1st TEST	2nd TEST	3rd TEST	
Start Time	11:07 AM	1:00 PM	3:05 PM	4:45 PM	
End Time	12:10 AM	2:10 PM	4:15 PM	5:50 PM	Average
Lbs of coils ran	Failed due to testing apparatus	39000	37840	37710	
	Glass probe broke	38000	37770	37900	
		38160	37930	37750	
		38050	37570	51840	
		38100	37710	45980	
		38190	37790	52700	
Total Tons per hour		114.75	113.305	131.94	119.9983333

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

TAB 14
CONSTRUCTION PERMIT-NSPS SOURCE NO. 12020035 ("2012 CONSTRUCTION PERMIT")

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

PAT QUINN, GOVERNOR JOHN J. KIM, INTERIM DIRECTOR

217/785-1705

CONSTRUCTION PERMIT -- NSPS SOURCE

PERMITTEE

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

Application No.: 12020035 I.D. No.: 031600FWL
Applicant's Designation: Date Received: February 23, 2012
Subject: Steel Pickling 1
Date Issued: April 26, 2012
Location: 429 West 127th Street, Chicago, Cook County 60628

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission unit(s) and/or air pollution control equipment consisting of modification of the existing steel coil pickling line comprised of four (4) pickling tanks and coil washer exhausted to turbo-tunnel enclosure and three (3) 14,000 gallon hydrochloric acid storage tanks all controlled by a scrubber and one (1) coil oil coater to allow increase of steel processing rate as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This permit is issued based on the emission of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the above-listed equipment 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 modification of existing steel coil pickling line not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the 40 CFR 52.21 Prevention o Significant Deterioration of Air Quality. 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) and Particulate Matter less than 10 microns (PM_{10}) from above-listed equipment below the levels that would trigger the applicability of these rules.

c. Operation of the equipment listed above is allowed under this construction permit until final action is taken on the Federally Enforceable State Operating Permit (FESOP) application for this source.

2a. The coil coater associated with the existing steel coil pickling line is subject to the New Source Performance Standards (NSPS) for Metal Coil Surface Coating, 40 CFR 60 Subparts A and TT. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.460(a) and (b), the provisions of 40 CFR 60 Subpart TT apply to the following affected facilities in a metal coil surface coating operation: each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously that commences construction, modification, or reconstruction after January 5, 1981.

b. Pursuant to 40 CFR 60.462(a)(1), on and after the date on which 40 CFR 60.8 requires a performance test to be completed, each owner or operator subject to 40 CFR 60 Subpart TT shall not cause to be discharged into the atmosphere more than 0.28 kilogram VOC per liter (kg VOC/ l) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s).

3a. 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. 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. Pursuant to 35 Ill. Adm. Code 212.316(f), unless an emission unit has been assigned a particulate matter, PM_{10}, or fugitive particulate matter emissions limitation elsewhere in this 35 Ill. Adm. Code 212.316 or in 35 Ill. Adm. Code 212 Subparts R or S, no person shall cause or allow fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent.

e. 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).

f. Pursuant to 35 Ill. Adm. Code 212.324(b), except as otherwise provided in 35 Ill. Adm. Code 212.324, no person shall cause or allow the emission into the atmosphere, of PM_{10}, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period.

4a. Pursuant to 35 Ill. Adm. Code 218.204(d), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Coil Coating. Except as otherwise provided in 35 Ill. Adm. Code 218.204(a), (c), (g), (h), (j), (l), (n), (p), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. The emission limitations are as follows:

	kg/l	lb/gal
Coil Coating	0.20	(1.7)

b. Pursuant to 35 Ill. Adm. Code 218.301, 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 unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall only apply to photochemically reactive material.

5a. This permit is issued based on the steel coil pickling line at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants, 40 CFR 63 Subpart CCC. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.

b. This permit is issued based on coil coater associated with the existing steel coil pickling line at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Coil, 40 CFR Part 63, Subpart SSSS. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.

6a. 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 this rule 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 this rule 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.

b. Pursuant to 35 Ill. Adm. Code 212.324(d), the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, 35 Ill. Adm. Code 212.324(d) is not a defense finding of a violation of the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c).

7a. This permit is issued based on the solvent cleaning operations at this source not being subject to the requirements of 35 Ill. Adm. Code 218.187(b). Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012: Except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations that use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;

b. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.

8. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

9. Pursuant to 35 Ill. Adm. Code 212.324(f), for any process emission unit subject to 35 Ill. Adm. Code 212.324(a), the owner or operator shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 Ill. Adm. Code 212.324 shall be met at all times. 35 Ill. Adm. Code 212.324 shall not affect the applicability of 35 Ill. Adm. Code 201.149. Proper maintenance shall include the following minimum requirements:

   i. Visual inspections of air pollution control equipment;

   ii. Maintenance of an adequate inventory of spare parts; and

   iii. Expeditious repairs, unless the emission unit is shutdown.

10a. 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 Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the scrubber and turbo-tunnel enclosure such that scrubber and turbo-tunnel enclosure are kept in proper working condition and not cause a violation the Environmental Protection Act or regulations promulgated therein.

   c. The scrubber and turbo-tunnel enclosure shall be in operation at all times when the associated emission units are in operation and emitting air contaminants.

   d. The scrubber shall be equipped with a monitoring device that continuously indicates and records the make-up water flow and pressure drop across the scrubber. The Permittee shall calibrate, maintain, and operate the scrubber monitoring device according to the manufacturer's specifications.

11a. This permit is issued based on negligible emissions of hydrogen chloride (HCl) from the steel coil pickling line and three hydrochloric acid storage tanks. For this purpose, HCl emission shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year. These limits

are based on the maximum production rate, the most recent stack test data and the following operational limits:

i. Steel Coil Throughput: 120 tons/hr, 89,000 tons/mo, 1,050,000 tons/yr;

ii. Hydrochloric Acid Usage: 2,510 lbs/hr, 930 tons/mo, 11,000 tons/yr;

iii. Maximum HCl concentration in pickling tanks: 16%;

iv. Maximum pickling tanks temperature: 190°F;

v. Scrubber make-up water flow no less than 1.88 gal/min; and

vi. Pressure drop across the scrubber no more than 9.15" w.c.

b. The VOM usage and VOM emission from the oil coater shall not exceed the following limits:

VOM Usage		VOM Emissions	
Tons/Month	Tons/Year	Tons/Month	Tons/Year
1.27	12.70	1.27	12.70

These limits are based on the maximum material usage, the maximum VOM and HAP content of the materials, and the maximum emissions determined by a material balance. The VOM and HAP emissions shall be determined from the following equation:

$$E = \sum(V_i \times C_i)$$

Where:
E = VOM or HAP emissions (ton);

V_i = individual coating usage (ton); and

C_i = VOM or HAP content of the each individual coating (wt. fraction).

c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from pickling line shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.31 tons/month and 13.14 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements of Section 112(g) of the Clean Air Act, the NESHAP for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants, 40 CFR 63 Subpart CCC, and the NESHAP for Surface Coating of Metal Coil, 40 CFR Part 63, Subpart SSSS.

d. 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).

12a. Pursuant to 40 CFR 60.8(a), within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Illinois EPA or USEPA under section 114 of the Clean Air Act, the owner or operator of such facility shall conduct performance test(s) and furnish the Illinois EPA or USEPA a written report of the results of such performance test(s).

b. Pursuant to 40 CFR 60.8(b), performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in each applicable subpart of 40 CFR Part 60 unless the Illinois EPA or USEPA:

i. Specifies or approves, in specific cases, the use of a reference method with minor changes in methodology;

ii. Approves the use of an equivalent method;

iii. Approves the use of an alternative method the results of which he has determined to be adequate for indicating whether a specific source is in compliance;

iv. Waives the requirement for performance tests because the owner or operator of a source has demonstrated by other means to the Illinois EPA's or USEPA's satisfaction that the affected facility is in compliance with the standard; or

v. Approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors. Nothing in this paragraph shall be construed to abrogate the Illinois EPA's or USEPA's authority to require testing under section 114 of the Clean Air Act.

c. Pursuant to 40 CFR 60.8(c), performance tests shall be conducted under such conditions as the Illinois EPA or USEPA shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Illinois EPA or USEPA such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.

d. Pursuant to 40 CFR 60.8(e), the owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

i. Sampling ports adequate for test methods applicable to such facility. This includes:

A. Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test 1 methods and procedures; and

B. Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.

ii. Safe sampling platform(s).

iii. Safe access to sampling platform(s).

iv. Utilities for sampling and testing equipment.

13a. Pursuant to 40 CFR 60.463(b), the owner or operator of an affected facility shall conduct an initial performance test as required under 40 CFR 60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in 40 CFR 60.463.

b. Pursuant to 40 CFR 60.463(c)(1), the owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/l of coating solids applied. An owner or operator shall use the following procedures for each affected facility that does not use a capture system and control device to comply with the emission limit specified under 40 CFR 60.462(a)(1). The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Illinois EPA or USEPA may require the owner or operator who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Illinois EPA or USEPA.

i. Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month for each affected facility, except as provided under 40 CFR 60.463(c)(1)(iv). The weighted average of the total mass of VOC's used per unit volume of coating solids applied each calendar month is determined by the following procedures.

A. Calculate the mass of VOC's used (Mo + Md) during each calendar month for each affected facility by using Equation 1 in 40 CFR 60.463(c)(1)(i)(A).

$$M_o + M_d = \sum_{i=1}^{n} L_{ci} D_{ci} W_{oi} + \sum_{j=1}^{m} L_{dj} D_{dj} \qquad \text{Equation 1}$$

($SL_{dj}D_{dj}$ will be 0 if no VOC solvent is added to the coatings, as received)
Where:

n is the number of different coatings used during the calendar month, and

m is the number of different VOC solvents added to coatings used during the calendar month.

B. Calculate the total volume of coating solids used (L_s) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^{n} V_{si} L_{ci} \qquad \text{Equation 2}$$

Where:

n is the number of different coatings used during the calendar month.

C. Calculate the volume-weighted average mass of VOC's used per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s} \qquad \text{Equation 3}$$

ii. Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during the calendar month for each affected facility by the following equation:

$$N = G \qquad \text{Equation 4}$$

iii. Where the volume-weighted average mass of VOC's discharged to the atmosphere per unit volume of coating solids applied (N) is equal to or less than 0.28 kg/ l, the affected facility is in compliance.

iv. If each individual coating used by an affected facility has a VOC content, as received, that is equal to or less than 0.28 kg/l of coating solids, the affected facility is in compliance provided

no VOC's are added to the coatings during distribution or application.

14a. Pursuant to 40 CFR 60.466(a)(1), the reference methods in appendix A to 40 CFR Part 60, except as provided under 40 CFR 60.8(b), shall be used to determine compliance with 40 CFR 60.462 as follows: Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24;

b. Pursuant to 40 CFR 60.466(b), for Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.

15a. 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 Conditions 16 and 17 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

16. 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 particulate matter emissions, 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.

17. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.

18. Pursuant to 40 CFR 60.464(a), where compliance with the numerical limit specified in 40 CFR 60.462(a)(1) or (2) is achieved through the use of low VOC-content coatings without the use of emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, the owner or operator shall compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in 40 CFR 60.463.

19a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.

20. Pursuant to 40 CFR 60.465(e), each owner or operator subject to the provisions of 40 CFR 60 Subpart TT shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the

incinerator combustion temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed.

21. 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.

22a. 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.

b. Pursuant to 35 Ill. Adm. Code 212.324(g)(1), written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with 35 Ill. Adm. Code 212.324(f).

c. Pursuant to 35 Ill. Adm. Code 212.324(g)(2), the owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such

malfunction and shall state what corrective actions were taken and what repairs were made.

d. Pursuant to 35 Ill. Adm. Code 212.324(g)(3), a written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.

e. Pursuant to 35 Ill. Adm. Code 212.324(g)(5), the records required under 35 Ill. Adm. Code 212.324 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.

23a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(B), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall on and after January 1, 2012, collect and record the following information each month for each cleaning operation, other than cleaning operations identified in 35 Ill. Adm. Code 218.187 (a)(2):

i. The name and identification of each VOM-containing cleaning solution as applied in each cleaning operation;

ii. The VOM content of each cleaning solution as applied in each cleaning operation;

iii. The weight of VOM per volume and the volume of each as-used cleaning solution;

iv. The total monthly VOM emissions from cleaning operations at the source;

b. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by this 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.

c. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:

i. The name and identification number of each coating as applied on each coating line;

ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;

24a. 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 scrubber and turbo-tunnel enclosure:

A. Records for periodic inspection of the scrubber and turbo-tunnel enclosure with date, individual performing the inspection, and nature of inspection; and

B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

ii. Daily HCl concentration in pickling tanks (wt.%);

ii. Daily pickling tank temperature (°F);

iii. Daily scrubber make-up water flow (gal/min);

iv. Daily pressure drop across the scrubber (in of w.c.);

v. Steel process rate (tons/mo, tons/yr);

vi. Hydrochloric acid usage (gal/mo, gal/yr);

vii. Coating and cleanup solvent usage (tons/month and tons/year);

viii. The VOM and HAP content of each coating and cleanup solvent (% by weight);

ix. Monthly and annual emissions of PM, VOM and HAP from the steel coil pickling line with supporting calculations (tons/month, tons/year).

b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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 the Illinois EPA or USEPA request for records during the course of a source inspection.

25a. Pursuant to 40 CFR 60.7(a), any owner or operator subject to the provisions of 40 CFR Part 60 shall furnish the Illinois EPA or USEPA written notification or, if acceptable to both the Illinois EPA and

USEPA and the owner or operator of a source, electronic notification, as follows:

i. A notification of the date construction (or reconstruction as defined under 40 CFR 60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.

ii. A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.

iii. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Illinois EPA or USEPA may request additional relevant information subsequent to this notice.

b. Pursuant to 40 CFR 60.465(a), where compliance with the numerical limit specified in 40 CFR 60.462(a) (1), (2), or (4) is achieved through the use of low VOC-content coatings without emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, each owner or operator subject to the provisions of 40 CFR 60 Subpart TT shall include in the initial compliance report required by 40 CFR 60.8 the weighted average of the VOC content of coatings used during a period of one calendar month for each affected facility. Where compliance with 40 CFR 60.462(a)(4) is achieved through the intermittent use of a control device, reports shall include separate values of the weighted average VOC content of coatings used with and without the control device in operation.

c. Pursuant to 40 CFR 60.465(c), following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Illinois EPA or USEPA every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40 CFR 60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Illinois EPA or USEPA semiannually.

26a. 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.

b. Pursuant to 35 Ill. Adm. Code 212.324(g)(4), copies of all records required by 35 Ill. Adm. Code 212.324 shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.

27a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall comply with the following: Notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2), ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.

b. Pursuant to 35 Ill. Adm. Code 218.211(c), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following:

i. By a date consistent with 35 Ill. Adm. Code 218.106, or upon initial start-up of a new coating line, or upon changing the method of compliance from an existing subject coating line from 35 Ill. Adm. Code 218.205, 35 Ill. Adm. Code 218.207, 35 Ill. Adm. Code 218.215, or 35 Ill. Adm. Code 218.216 to 35 Ill. Adm. Code 218.204; the owner or operator of a subject coating line shall certify to the Illinois EPA that the coating line will be in compliance with 35 Ill. Adm. Code 218.204 on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date. The certification shall include:

A. The name and identification number of each coating as applied on each coating line;

B. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;

ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:

A. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurance of the violation.

B. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) or (e), as applicable.

28a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or deviation and efforts to reduce emissions and future occurrences.

b. Two (2) copies of required reports and notifications shall be sent to:

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

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

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

If you have any questions on this permit, please contact Valeriy Brodsky at 217/785-1705.

Edwin C. Bakowski

RWB

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

Date Signed: 4/26/2012

ECB:VJB:jws

cc: Region 1

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 susperseded 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 to copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

   d. to obtain and remove samples of any discharge or emissions of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

   The issuance of this permit:

   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 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.

DIRECTORY
ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR

For assistance in preparing a permit application contact the Permit Section.

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
1021 N. Grand Ave E.
P.O. Box 19506
Springfield, Illinois 62794-9506

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

Illinois EPA
Region 1
Bureau of air, FOS
9511 West Harrison
Des Plaines, Illinois 60016
847/294-4000

Illinois EPA
Region 2
5415 North University
Peoria, Illinois 61614
309/693-5463

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