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STATE OF ILLINOIS
Pollution Control Board

ILLINOIS POLLUTION CONTROL BOARD

NACME Steel Processing, L.L.C.,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB 01-85
	)	
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,	)	
	)	
Respondent.	)	

NOTICE OF FILING

TO Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East, P.O. Box 19276
Springfield, IL 62794-9276

PLEASE TAKE NOTICE that we have on this day caused to be filed with the Office of the Clerk of the Illinois Pollution Control Board the **Petition for Hearing**, a copy of which is attached hereto and herewith served upon you.

Dated: November 22, 2000.

NACME Steel Processing, L.L.C., *Petitioner*

By: _____
One of Its Attorneys

Edward V. Walsh, III
SACHNOFF & WEAVER, LTD.
30 South Wacker Drive
Suite 2900
Chicago, Illinois 60606
(312) 207-3898

ILLINOIS POLLUTION CONTROL BOARD

NACME Steel Processing, L.L.C.,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB 01-85
	)	
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,	)	
	)	
Respondent.	)	

PETITION FOR HEARING

Petitioner NACME Steel Processing, L.L.C. ("NACME"), by its attorneys, Sachnoff & Weaver, Ltd., pursuant to Section 40 of the Illinois Environmental Protection Act (the "Act"), petitions the Board for review of the Illinois Environmental Protection Agency's (the "Agency") grant of a permit under Section 39 of the Act with contested conditions, and in support of its Petition states as follows:

1. Petitioner is the owner/operator of a steel pickling facility located at 429 West 127th Street, Chicago, Illinois (the "Facility"). In connection with Facility processes, NACME operates an Agency permitted "scrubber" for its hydrochloric acid ("HCL") air emissions.

2. On or about July 25, 2000, NACME, by its air emissions consultant, Mostardi-Platt Associates, Inc. ("MPA"), submitted an "Air Emission Services Operating Permit Revision Application" to the Agency. The purpose of the permit application was to request an increase in permitted HCL emission rates to more accurately reflect potential emission levels from Facility processes (a copy of the permit application is attached hereto as Exhibit A).

3. By letter dated August 29, 2000, the Agency requested further information concerning the permit application from NACME, including information demonstrating that NACME's Facility was not a "support facility" with respect to the ACME Steel Company

facility in Riverdale, Illinois. NACME understands based on Agency statements that the ACME facility is a Title V source of air emissions. In its request for further information, the Agency speculated, based on unknown information, that the NACME and Acme facilities may constitute a single source for purposes of Title V permitting under Section 39.5 of the Act (a copy of the Agency's August 29, 2000, letter is attached hereto as Exhibit B).

4. By letter dated September 19, 2000, NACME, through MPA, responded to the Agency's August 29, 2000, request for further information. Among other things, MPA provided information showing that NACME's Facility is not a "support facility" with regard to the Acme steel facility because (i) the NACME Facility does not assist to a significant extent in the production of steel coils at the Acme steel facility; (ii) the NACME and Acme facilities are not under the common control of the same person; and (iii) the NACME and Acme facilities are neither contiguous nor adjacent to one another. Specifically, MPA pointed out that Acme is merely a minority owner of NACME (one of three such owners) and that NACME is not under the common control of any one owner but, rather, has entirely separate management from ACME and the other owners (a copy of the September 19, 2000, letter is attached hereto as Exhibit C).

5. On or about October 25, 2000, the Agency issued to NACME a state operating permit with respect to NACME's HCL air emissions. The operating permit established various conditions with respect to HCL air emissions in separately numbered paragraphs, as well as in a "standard conditions for operating permits" attachment to the permit (a copy of the October 25, 2000, permit is attached hereto as Exhibit D).

6. However, the operating permit also included an unnumbered conclusion paragraph, as follows:

> Please note that the Illinois EPA has determined that NACME Steel Processing pickling plant constitutes a support facility to the Title V source, Acme Steel plant

(I.D. 031258AAI). Accordingly, NACME Steel Processing is required to submit a Title V application. Since NACME Steel Processing is part of a major source of Hazardous Air Pollutant (HAP) emission, the NACME Steel Processing is a subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63, Subpart CCC pursuant to applicability criteria of 63.1155(a). The NACME Steel Processing shall demonstrate compliance with 40 CFR 63, Subpart CCC no late than June 22, 2001.

7. The Agency is inaccurate in its assertion that NACME is required to submit a Title V application for its Facility and the findings and conditions contained in the above quoted portion of the permit are wrong and misplaced.

8. As pointed out to the Agency during the permit application process, NACME's Facility does not constitute a "support facility" to a Title V source as defined under Illinois law (415 ILCS 5/39.5) because, among other things, (a) NACME does not convey, store or otherwise assist to a significant extent in the production of a principal product at another stationary source, namely Acme Steel Company; and (b) NACME is not located on a contiguous or adjacent property to a Title V source that is under the common control of the same person.

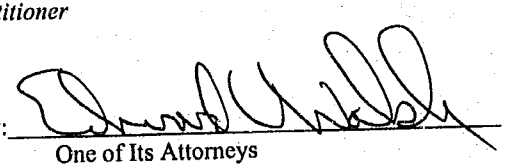
9. The Agency's unwarranted imposition of the above findings and conclusions in NACME's operating permit will result in onerous permit application and regulatory compliance duties unless the mistaken findings and conclusions are stricken from the permit.

For the above reasons, Petitioner requests a hearing venued in the City of Chicago concerning the contested conditions inaccurately included in NACME's state operating permit and for appropriate relief including, but not limited to, removal of the unsupported conditions from NACME's permit.

Dated: November 22, 2000.

Respectfully submitted,

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

By: 
One of Its Attorneys

Edward V. Walsh, III
SACHNOFF & WEAVER, LTD.
30 South Wacker Drive
Suite 2900
Chicago, Illinois 60606
(312) 207-1000

July 25, 2000

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 62702-9276

Dear Mr. Sutton:

Enclosed please find two copies of an Illinois Environmental Protection Agency (IEPA) Operating Permit revision request for the NACME Steel Processing facility (ID No. 031600FWL) location at 429 West 127th Street in Chicago, Illinois (the facility).

The purpose of the request is to increase permitted emission rates from the existing hydrochloric acid (HCl) pickling process to more accurately reflect potential emission levels from this process. Current permitted emission rates as outlined in the facility's existing IEPA Operating Permit (Application No. 96020074) are 0.02 pounds of HCl per hour (lbs HCl/hr) and 0.09 tons HCl per year (tons HCl/yr). NACME, a minor HCL emission source, respectfully requests the rates be revised to 0.52 lbs HCl/hr and 2.28 tons HCl/yr.

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 & Plant Manager

TB/kmt

Enclosures

AIR EMISSION SERVICES OPERATING PERMIT REVISION APPLICATION

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

July 25, 2000

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*	I.D. NO. _____ PERMIT NO. _____ DATE _____

1a. NAME OF OWNER: *NACME Steel Processing*		2a. NAME OF OPERATOR: *NACME Steel Processing*	
1b. STREET ADDRESS OF OWNER: *429 West 127th Street*		2b. STREET ADDRESS OF OPERATOR: *429 West 127th Street*	
1c. CITY OF OWNER: *Chicago*		2c. CITY OF OPERATOR: *Chicago*	
1d. STATE OF OWNER: *Illinois*	1e. ZIP CODE: *60628*	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.

AUTHORIZED SIGNATURE(S):(D)

BY _____ SIGNATURE	DATE	BY _____ SIGNATURE	DATE
Thomas Beach TYPED OR PRINTED NAME OF SIGNER		TYPED OR PRINTED NAME OF SIGNER	
Vice President, Plant Manager TITLE 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 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: *NACME Steel Processing*	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): *NACME Steel Processing*
3. STREET ADDRESS OF EMISSION SOURCE: *428 West 127th Street*	4. CITY OF EMISSION SOURCE: *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):		
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.	*180,000*	LB/HR	c.	*240,000*	LB/HR
21a.	*HCL*	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.	*180,000*	LB/HR	c.	*240,000*	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 ☐ ALTERNATE USE OF _____ BEDS IN A SINGLE UNIT ☐ SOURCE SHUT DOWN ☐ OTHER: DESCRIBE	
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 CHAMDER: °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 _____ GPM AIR _____ SCFM OTHER: TYPE _____, FLOW RATE		10. COOLANT FLOW RATE PER CONDENSER: WATER _____ GPM AIR _____ 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: 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. *18* PPM (VOL)	b. *0.51* LB/HR	c. *Engineering Estimate/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. *18* PPM (VOL)	b. *0.52* LB/HR	c. *Engineering Estimate/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.

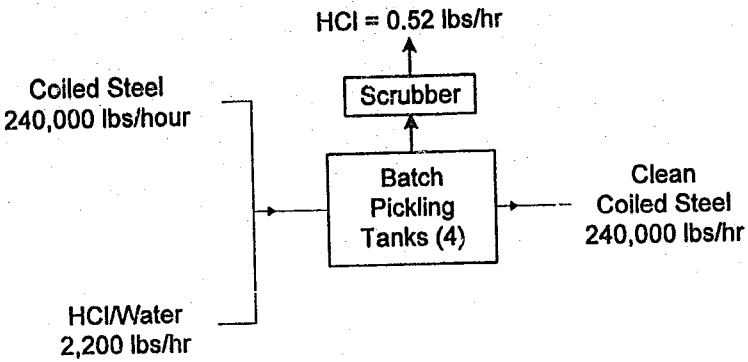
EXHAUST POINT INFORMATION

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: *50* FT	4. EXIT DIAMETER: *2* FT
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

Average Operation Rate

Requested Permit Limitation = 18 ppmv HCL
Pickling Process Average Gas Flow Rate = 4,975 DCSFM*

Emission Calculation
lbs/hr = ppm X Molecular Weight (mw) X DSCFM X (1.5584 x 10 E-7)

HCL lbs/hr = 18 ppmv X 36.453 X 4,975 DSCFM X (1.5584 x 10 E-7)

Hourly Emission Rate = **0.51 lbs HCL/hr**

Annual Emission Rate = 0.51 lbs HCL/hr X 8,760 hr/yr / 2,000 lbs/ton = **2.23 tons HCl/yr**

2,000 lbs/ton = **2.23 tons HCL/yr**

Maximum Operation Rate

Requested Permit Limitation = 18 ppmv HCL
Pickling Process Maximum Gas Flow Rate = 5,061 DSCFM*

Emission Calculation
lbs/hr = ppm X Molecular Weight (mw) X DSCFM X (1.5584 x 10 E-7)

HCL lbs/hr = 18 ppmv X 36.453 X 5,061 DSCFM X (1.5584 x 10 E-7)

Hourly Emission Rate = **0.52 lbs HCL/hr**

Annual Emission Rate = 0.52 HCL/hr X 8,760 hr/yr / 2,000 lbs/ton = **2.28 tons HCL/yr**

*Based Upon Year 2000 Flow Rate Measurements