

ILLINOIS POLLUTION CONTROL BOARD
October 20, 1988

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Complainant,)
)
v.) PCB 85-38
)
HECKETT, a Division of HARSCO)
CORPORATION, a Delaware)
corporation, and ACME STEEL)
COMPANY, successor of INTERLAKE,)
INC., a Delaware corporation,)
)
Respondents.)

MR. JAMES T. HARRINGTON, ESQ., OF ROSS AND HARDIES, APPEARED ON BEHALF OF THE RESPONDENT.

MR. JOSEPH J. ANNUNZIO, ESQ., ASSISTANT ATTORNEY GENERAL, APPEARED ON BEHALF OF THE COMPLAINANT.

OPINION AND ORDER OF THE BOARD (by M. Nardulli):

This matter comes before the Board upon a complaint filed on behalf of the Illinois Environmental Protection Agency (hereinafter "Agency"), by and through its attorney, Neil F. Hartigan, Attorney General of the State of Illinois, against Heckett and Interlake, Inc. Interlake, Inc. is the predecessor to Acme Steel Company (hereinafter "Acme"). The complaint alleges that Heckett and Acme violated Section 9(c) of the Act and 35 Ill. Adm. Code Sections 201.107, 201.141, 201.142 and 212.123(a).

Hearing on this matter was held on September 16, 1988 in Chicago, IL. At hearing, the parties submitted a Stipulation and Proposal for Settlement (Stipulation). The Stipulation is attached and adequately addresses the facts in this matter. Accordingly, this opinion will not contain the customary discussion of the issues.

The Board notes that according to the Stipulation, Acme and Heckett are not admitting their liability for violations alleged in the Complaint. Also, the Stipulation states that the Agency agrees to issue Heckett a five-year operating permit for its entire slag handling operations consistent with the applicable terms of the Stipulation. The operating permit shall become effective upon the Board's entry of the following order approving the Stipulation.

In evaluating this enforcement action and proposed settlement agreement, the Board has taken into consideration all the facts and circumstances in light of the specific criteria delineated in Section 33(c) of the Act and finds the Stipulation and Proposal for Settlement acceptable under 35 Ill. Adm. Code 103.180. Accordingly, the Board orders Acme and Heckett to comply with the Order set forth herein.

ORDER

It is the Order of the Illinois Pollution Control Board that:

- 1) The Board hereby accepts the Stipulation and Proposal for Settlement executed by Acme, Heckett and the Illinois Environmental Protection Agency concerning Acme's Riverside facility and filed with the Board on March 27, 1985. The Stipulation and the Proposal for Settlement is attached hereto.
- 2) Acme and Heckett, jointly, by certified check or money order payable to the State of Illinois and designated for deposit into the Environmental Protection Trust Fund, shall pay the sum of \$25,000.00 (Twenty-five thousand dollars). The sum shall be paid within 30 days of the date the Respondents receive notice of this order. The payment shall be mailed to:

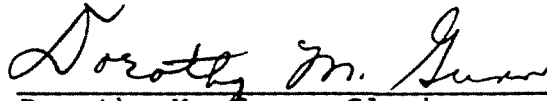
Fiscal Service Division
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

- 3) The terms and conditions of the Stipulation and Proposed Settlement are incorporated into and made a part of this Order.

IT IS SO ORDERED.

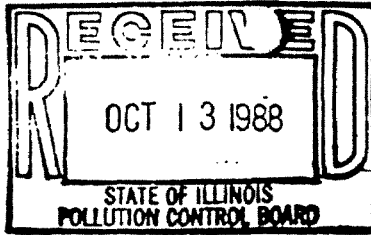
R.C. Flemal dissented.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on 20th day of October, 1988, by a vote of 6-1



Dorothy M. Gunn, Clerk
Illinois Pollution Control Board

STATE OF ILLINOIS)
)
COUNTY OF COOK) SS



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BEFORE THE POLLUTION CONTROL BOARD
STATE OF ILLINOIS

Environmental Protection Agency

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY,

Complainant,

v.

HECKETT, a Division of HARSCO
CORPORATION, a Delaware corporation,
and ACME STEEL COMPANY,
successor of INTERLAKE, INC., a
Delaware corporation,

Respondents.

PCB 85-38

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JUL 20 1988

ATTORNEY GENERAL

STIPULATION OF FACTS
AND PROPOSED SETTLEMENT

Complainant, the Illinois Environmental Protection Agency ("Agency"), by and through its attorney, Neil F. Hartigan, Attorney General of Illinois, and respondents, Heckett, a Division of Harsco Corporation, a Delaware corporation ("Heckett") and Acme Steel Company, successor of Interlake, Inc., a Delaware corporation ("Acme"), submit the following Stipulation of Facts and Proposed Settlement. The parties agree that the statement of facts contained herein represents a fair summary of the evidence and testimony which would be introduced by the parties if a full hearing were held. The parties further stipulate that this statement of facts is made and agreed upon for purposes of settlement only and neither the fact a party has entered into this Stipulation nor any of the facts stipulated herein shall be introduced into evidence in this or any other proceeding except

to enforce the terms by the parties to this agreement. . This agreement shall be null and void and held for naught unless the Pollution Control Board ("Board") approves and disposes of this matter on each and every one of the terms and conditions of the settlement set forth herein.

I.

JURISDICTION

The Board has jurisdiction of the subject matter herein and of the parties consenting hereto pursuant to the Illinois Environmental Protection Act, Ill.Rev.Stat., ch. 111-1/2, pars. 1001 et seq. (1985) ("Act").

II.

AUTHORIZATION

The undersigned representatives for each party certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Stipulation of Facts and Proposed Settlement and to legally bind them to it.

III.

APPLICABILITY

This Stipulation of Facts and Proposed Settlement ("Settlement") shall apply to and be binding upon the complainant, the Illinois

Attorney General and respondents, as well as the successors and assigns of each and any officer, director, agent, employee or servant. Respondents shall give notice of this Settlement to any successors in interest, prior to transfer of interest, and contemporaneously verify to the Illinois Environmental Protection Agency at the addresses provided in Section VI.E. below that such notice has been given.

IV.

UNCONTESTED FACTS

A. Complainant, the Agency, is an agency of the State of Illinois created pursuant to Section 4 of the Act and is charged, inter alia, with the duty of enforcing the Act pursuant to Title VIII thereof.

B. Respondent Heckett is a division of Harsco Corporation, a corporation organized and existing under the laws of the State of Delaware and duly licensed to conduct business in the State of Illinois.

C. Respondent Acme is a corporation organized and existing under the laws of the State of Delaware and duly licensed to conduct business in the State of Illinois.

D. At all times pertinent hereto, Acme or its predecessor Interlake has owned and operated a steel manufacturing facility ("facility") at 135th Street and Perry Avenue, Riverdale, Cook

County, Illinois. Located at the facility is a Basic Oxygen Furnace, or BOF. At the BOF, steel is made by a pneumatic process involving the blowing of high-purity oxygen onto the surface of molten pig iron. During the making of steel using this basic oxygen process, slag is formed.

E. The slag formed by the Acme basic oxygen steel making process is hauled from the BOF shop and subsequently processed by Heckett at the facility pursuant to the terms of a contract between Heckett and Acme. All of Heckett's slag handling processes at the facility can be classified as being a part of the slag-away operations or the slag processing operations.

1. In the slag-away operation, molten slag from Acme's BOF shop (also known as its "melt shop") is removed by Heckett in slag-lined pots owned by Acme and transported to a pit area where the molten slag is dumped and cooled. Periodically, slag which has solidified in the pot (a "skull") is removed in a process called "skulling." After skulling, the empty pots are relined with slag by Heckett.

2. In the slag processing operation, slag is removed from the pit by Heckett and is then screened and sized in order to make it commercially useful.

F. On January 30, 1981, Heckett filed a permit application with the Agency for its slag-away operation as described in Section IV.E.1. above (I.D. 031 258 AAS, Permit No. 81020019). Said permit application is attached hereto as Exhibit A. In Addendum

A of the application, Heckett provided for, with respect to slag pot lining, the use of a layer of dry processed slag.

G. That on the basis of the permit application, the Agency issued to Heckett a joint Construction and Operating Permit for its slag-away process on February 9, 1981. The permit stated that it was to expire on February 8, 1986. A copy of this joint Construction and Operating Permit is attached hereto as Exhibit B.

H. Following issuance of the permit, Heckett did not submit a new permit application nor did it request a revision of its existing permit to allow material other than dry processed slag to be used as a slag pot lining material in its slag-away process.

I. From on or about the issuance date of the permit until November 18, 1982, Heckett used 1 x 4 inch sized processed slag to line the pots.

J. From November 18, 1982 until on or about June 1, 1984, Heckett discontinued the use of 1 x 4 inch sized processed slag as a pot liner. Heckett informed the Agency that the practice was discontinued because of explosions caused by moisture in the slag.

K. Since on or about June 1, 1984, Heckett has used 1 x 4 inch processed slag as a pot liner. On one occasion after June 1, 1984, the use of 1 x 4 sized slag was discontinued during a

period of extremely wet weather so as to avoid injury to persons or severe damage to equipment because of the danger of explosion.

L. On March 27, 1985, the Illinois Attorney General's Office, on behalf of the Agency, filed a Complaint with the Board against Heckett and Acme's predecessor, Interlake, alleging certain violations of the Act and the Board's Air Pollution Control Rules, (35 Ill. Adm. Code Section 201.101 et seq.) by respondents. The violations alleged concerned slag handling at the Heckett facility. Said Complaint is incorporated herein by reference as if fully set out.

M. Heckett and Acme moved to dismiss the Complaint for various reasons and the Motion to Dismiss and the Agency's Response are incorporated herein by reference as though fully set out. The Board denied the motions to dismiss on May 16, 1985. Further, Heckett and Acme contend that there are factual and legal defenses to each count of the Complaint.

N. In November, 1985, Heckett applied for a renewal of its operating permit for the slag-away operations at the facility, based upon data in its original permit application. Said renewal application is attached hereto as Exhibit C.

O. On December 11, 1985, the Agency denied Heckett's application for a renewal operating permit. Said denial letter is attached hereto as Exhibit D.

P. On January 13, 1986, Heckett appealed the Agency's December 11, 1985 denial to the Board. (Heckett v. IEPA, PCB 86-8).

V.

PROPOSAL FOR SETTLEMENT

As a result of settlement discussions, respondents, the Attorney General and the Agency believe the public interest in this matter will be best served by resolution of this enforcement action and permit appeal under the terms and conditions provided herein. The parties agree that Acme's steel manufacturing business is of significant social and economic benefit and that Heckett's processing and reclamation of slag, an industrial by-product of steel manufacturing, is a necessary and useful service. The Acme steel facility is located in an area zoned for general industrial uses by the Village of Riverdale; the Heckett operation at the facility is similarly zoned. Riverdale is located in Cook County, which is a non-attainment area for ozone. There are no residences located in the immediate vicinity of the facility. Heckett's operations are a source of particulate emissions, which can cause adverse health effects in certain quantities. Discharges of particulates during Heckett's lining and skulling operations can be effectively controlled by use of an environmentally sound, safe, lining material.

All statements contained herein are agreed to for purposes of settling this action only and shall be null and void and of no

effect in any further proceeding or cause of action if the Board does not approve this proposal for settlement in its entirety.

VI.

TERMS OF SETTLEMENT

Respondents and the Agency have agreed to the following terms of settlement. These terms shall be in full settlement of the action filed herein by the Agency and respondents' liability for all violations alleged in the Complaint.

A. The respondents neither admit nor deny the violations of Section 9(a) of the Act, and 35 Ill. Adm. Code 201.141, 212.123(a), 212.301 and 201.142 as alleged by the Agency in Counts I, II, III and V of the Complaint filed in this action.

B. Heckett neither admits nor denies the violations of Section 9(a) of the Act and 35 Ill. Adm. Code 201.207 as alleged by the Agency in Count IV of the Complaint filed in this action.

C. Respondent Heckett agrees that it will consistently use 1 x 4 inch screened, processed slag as a pot lining for the slag pots used to transport slag from Acme's BOF shop. The pot lining material may consist of hot, unsized slag in a quantity that will not cause or contribute to violations of the Act or Board Rules.

D. Respondent Acme agrees that it will accept the consistent use of a 1 x 4 inch screened, processed slag as a lining for the slag pots used to transport slag from Acme's BOF shop.

E. Notwithstanding the terms of Paragraph VI.C., if any event including, but not limited to, weather conditions and/or other conditions necessitating the discontinuance of the use of 1 x 4 inch screened, processed slag to prevent injury to persons or severe damage to equipment, precludes Heckett's use of 1 x 4 inch screened, processed slag as a lining material for the slag pots, Heckett shall immediately notify the Agency by telephone and no later than two (2) business days thereafter in writing of the event at the addresses provided below. This notice shall describe the expected length of time said lining material cannot be used, the specific reasons precluding the use of said lining material, and the expected time period at which use of a 1 x 4 inch screened, processed slag will be resumed.

Notice shall be sent to:

Manager, Field Operations Section
Division of Air Pollution Control
Illinois Environmental Protection Agency
1701 South First Avenue
Suite 600
Maywood, Illinois 60153
(312) 345-9780

Manager, Permits Sections
Division of Air Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706
(217) 782-2113

Heckett's use of pot lining material under such circumstances shall not constitute a violation of the terms of the permit referred to in paragraph VI.F.

F. The Agency agrees to issue to Heckett a five year operating permit for its entire slag handling operations consistent with Paragraphs VI.C. through VI.F. and with all other applicable terms of this Settlement. The permit to be issued to Heckett is attached hereto as Exhibit E. Under this permit all of Heckett's activities shall be covered by one operating permit. Heckett agrees to dismiss its pending permit appeal, Heckett v. IEPA, PCB 86-8 in consideration of the Agency's issuance of an operating permit. The operating permit shall become effective upon the Board's entry of an order approving this settlement and dismissing PCB 86-8.

G. The parties enter into this Stipulation and Proposal for Settlement and the respondents agree to pay the penalty specified in this paragraph in order to avoid the substantial costs, inconveniences and uncertainties of further litigation. In order to resolve this dispute and as a condition of Settlement, the respondents agree to jointly pay a penalty of twenty-five thousand (\$25,000.00) into the Environmental Protection Trust Fund within thirty (30) days from the date on which the Board adopts a final order approving, accepting and incorporating this Stipulation and Proposal for Settlement. Payment shall be made by certified check or money order and shall be sent by first class mail to:

Illinois Environmental
Protection Agency
Fiscal Services Division
2200 Churchill Road
Springfield, Illinois 62706

H. The Illinois Attorney General and the Agency agree that they shall not pursue claims against respondents for violations of the Illinois Environmental Protection Act or Pollution Control Board Rules as stated in the Complaint.

VII.

INSPECTION

The respondents agree that the Agency, pursuant to Section 4(d) of the Illinois Environmental Protection Act, Ill.Rev.Stat., ch. 111-1/2, par. 1004(d) (1985) shall have the right of entry into and upon the Acme Steel manufacturing facility in Riverdale, Illinois, which is the subject of this Settlement Agreement, for the purposes of carrying out inspections, reviewing records, and/or observing any tests which are necessary to ensure that the purposes of this Settlement Agreement are effectuated.

VIII

COMPLIANCE WITH OTHER LAWS AND REGULATIONS

A. This Settlement Agreement in no way affects respondents' responsibility to comply with any federal, state or local regulations, including but not limited to, the Illinois Environmental Protection Act, Ill.Rev.Stat., ch. 111-1/2, par. 1001 et seq. (1985) and the Illinois Pollution Control Board Air Pollution Control Regulations.

B. This Settlement Agreement resolves and disposes of all violations alleged in the Agency's complaint and all air pollution violations that could have have been alleged by the Agency at the time of this agreement. However, nothing in this Settlement Agreement shall be construed as a waiver by complainant of the right to redress future violations or obtain penalties with respect thereto.

WHEREFORE, complainant and respondents jointly request that the Board adopt and accept; the following Stipulation and Proposal for Settlement as written.

AGREED:

FOR THE COMPLAINANT:

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: Joseph Svobeda

JOSEPH SVOBODA
Manager, Enforcement Programs

Dated: 7/13/88

NEIL F. HARTIGAN
Attorney General
State of Illinois

By: Joseph J. Annunzio

Joseph J. Annunzio
Assistant Attorney General

Dated: _____

ns0fl

FOR THE RESPONDENTS:

HECKETT, a Division of
HARSCO CORPORATION

By: Richard E. Chapla

Richard E. Chapla
Vice President - Finance &
Administration

Dated: August 25, 1987

ACME STEEL COMPANY

By: Louis D. Tanno

Vice President - Operations

Dated: July 6, 1988



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

APPLICATION FOR A PERMIT (A) <input checked="" type="checkbox"/> CONSTRUCT <input checked="" type="checkbox"/> OPERATE NAME OF EQUIPMENT TO BE CONSTRUCTED OR OPERATED <u>Slag-Away Operation</u> (B)	FOR AGENCY USE ONLY I. D. NO. _____ PERMIT NO. _____ DATE _____
---	--

1a. NAME OF OWNER: <u>HECKETT, Division of Harsco Corporation</u>	2a. NAME OF OPERATOR: <u>HECKETT, Division of Harsco Corporation</u>		
1b. STREET ADDRESS OF OWNER: <u>P. O. Box 1071</u>	2b. STREET ADDRESS OF OPERATOR: <u>P. O. Box 559</u>		
1c. CITY OF OWNER: <u>Butler</u>	2c. CITY OF OPERATOR: <u>East Chicago</u>		
1d. STATE OF OWNER: <u>Pennsylvania</u>	1e. ZIP CODE: <u>16001</u>	2d. STATE OF OPERATOR: <u>Indiana</u>	2e. ZIP CODE: <u>46311</u>

3a. NAME OF CORPORATE DIVISION OR PLANT: <u>HECKETT, Plant No. 27</u>	3b. STREET ADDRESS OF EMISSION SOURCE: <u>13500 Perry Avenue</u>			
3c. CITY OF EMISSION SOURCE: <u>Riverdale</u>	3d. LOCATED WITHIN CITY LIMITS: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	3e. TOWNSHIP: <u>Thornton</u>	3f. COUNTY: <u>Cook</u>	3g. ZIP CODE: <u>60627</u>

4. ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) <u>Robert C. Pfeilsticker, Jr.</u>	5. TELEPHONE NUMBER FOR AGENCY TO CALL: <u>(412) 283-5741</u>
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE) <input checked="" type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input type="checkbox"/> EMISSION SOURCE	7. YOUR DESIGNATION FOR THIS APPLICATION: (C) <u>27-5-5B</u>

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 APPLICATION REMAINS TRUE, CORRECT AND CURRENT. BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION. See attached cover letter.

AUTHORIZED SIGNATURE(S): (D)

BY <u>Paul R. Pack</u> <u>1-30-81</u> SIGNATURE DATE <u>Paul R. Pack</u> TYPED OR PRINTED NAME OF SIGNER <u>Vice President - Operations</u> TITLE OF SIGNER	BY _____ _____ SIGNATURE DATE <u>RECEIVED</u> TYPED OR PRINTED NAME OF SIGNER <u>IEPP-AD-11-11</u> 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 ONLY BE USED TO REQUEST ONE TYPE OF PERMIT - CONSTRUCTION OR OPERATION - AND NOT BOTH.

(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 PCB REGS., CHAPTER 2, PART 1, RULE 103(a)(4) OR 103(b)(5) 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.

IF A PLOT PLAN/MAP HAS PREVIOUSLY BEEN SUBMITTED, SPECIFY:

AGENCY I.D. NUMBER _____

APPLICATION NUMBER _____

IS THE APPROXIMATE SIZE OF APPLICANT'S PREMISES LESS THAN 1 ACRE?

YES NO: SPECIFY _____ ACRES

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 14, 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 MALFUNCTIONS 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. WAS THIS OPERATION THE SUBJECT OF A VARIANCE PETITION FILED WITH THE ILLINOIS POLLUTION CONTROL BOARD ON OR BEFORE JUNE 13, 1972:

YES NO

IF "YES," CITE: PCB NUMBER(S) _____, DATE OF BOARD ORDER _____

WAS CONSTRUCTION OR MODIFICATION OF EQUIPMENT, SUFFICIENT TO ACHIEVE COMPLIANCE WITH THE "RULES AND REGULATIONS GOVERNING THE CONTROL OF AIR POLLUTION" EFFECTIVE PRIOR TO APRIL 14, 1972, COMMENCED PRIOR TO APRIL 14, 1972:

YES NO Not Applicable

IF "YES," EXPLAIN IN DETAIL, AND IDENTIFY EXPLANATION AS EXHIBIT D.

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

Cover Letter	1 page
Resolution for Signature Authorization	1 page
APC 200	2 pages
Plot Plan	1 page
Flow Diagram	1 page
APC 202	2 pages
APC 204 w/Exhibit F	2 pages
Addendum A	2 pages
Addendum B	2 pages

TOTAL NUMBER OF PAGES 14



217/782-2113

OPERATING PERMIT

RECEIVED

JUL 20 1988

ATTORNEY GENERAL

PERMITEE

Heckett Engineering Division of Harsco Corporation
Attention: Robert C. Pfeilsticker
Post Office Box 1071
Butler, Pennsylvania 16001

Application No.: 84030043

I.D. No.: 031258AAS

Applicant's Designation:

Date Received:

Subject: Steel Scrap & Slag Reclamation Plant & Slag Away

Date Issued: 1988

Expiration Date: 1993

Location: 13500 Perry Avenue, Riverdale, Illinois

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a steel reclamation plant involving a grizzly, 7 conveyors, 2 screens, stockpiles and the slag away process as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. This permit becomes effective upon the day that the Pollution Control Board enters an order approving the settlement agreements reached in PCB 85-38 and PCB 86-8 and dismisses PCB 86-8.
2. Heckett is authorized to use up to 3 parts of hot unsized slag for every 15 parts of sized 1 x 4 slag as pot liner when the hot unsized slag is necessary to dry the sized 1 x 4 slag for safety reasons. At all other times Heckett shall use 1 x 4 sized slag as a pot liner.
3. This permit incorporates by reference all terms and conditions of the settlement agreement adopted by the Board in E.P.A. versus Heckett Engineering Division of Harsco Corporation & Acme Steel, PCB 85-38.

It should be noted that this permit, 84030043, includes the operation of the "Slag Away" process formerly covered in 81020019 as requested in the settlement agreement in PCB 85-38.

Terry A. Sweitzer, P.E.
Manager, Permit Section
Division of Air Pollution Control

TAS:WDI:kjh/25

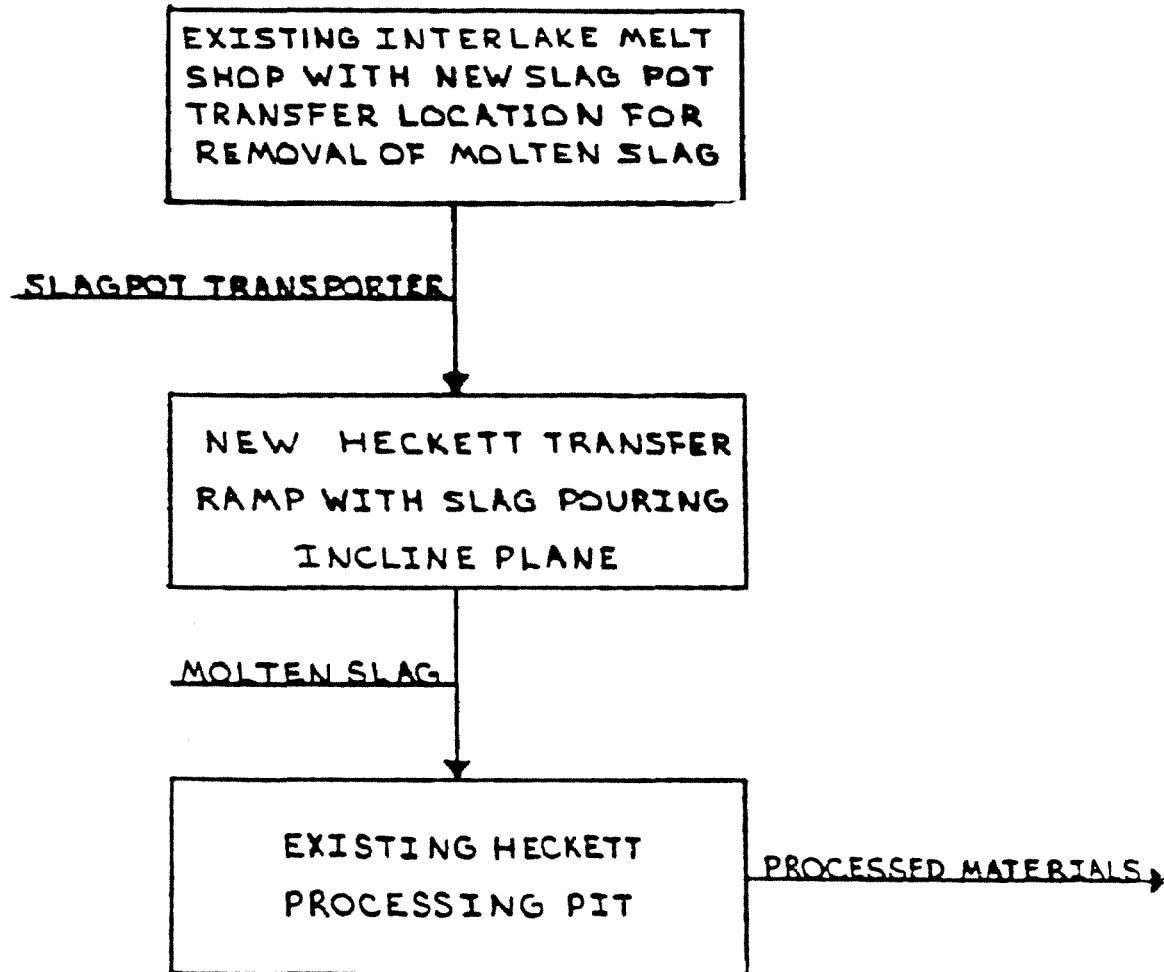
cc: Region 1

CALCULATION SHEET

JOB TITLE

ENGINEER
E. R. OF PROJECT

PAGE
DATE



HECKETT
DIVISION OF HARSCO CORP.
PLANT NO. 27

FLOW DIAGRAM:
SLAG-AWAY OPERATION



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

COMPLIANCE PROGRAM AND PROJECT COMPLETION SCHEDULE NAME OF EQUIPMENT TO BE CONSTRUCTED OR MODIFIED <u>Slag-Away Operation</u> (A)	FOR AGENCY USE ONLY	
	I. D. NO.	_____
	PERMIT NO.	_____
	DATE	_____

1a. NAME OF OWNER: HECKETT, Division of Harsco Corporation		2a. NAME OF OPERATOR: HECKETT, Division of Harsco Corporation	
1b. STREET ADDRESS OF OWNER: P. O. Box 1071		2b. STREET ADDRESS OF OPERATOR: P. O. Box 559	
1c. CITY OF OWNER: Butler		2c. CITY OF OPERATOR: East Chicago	
1d. STATE OF OWNER: Pennsylvania	1e. ZIP CODE: 16001	2d. STATE OF OPERATOR: Indiana	2e. ZIP CODE: 46312

3a. NAME OF CORPORATE DIVISION OR PLANT: HECKETT, Plant No. 27		3b. STREET ADDRESS OF EMISSION SOURCE: 13500 Perry Avenue		
3c. CITY OF EMISSION SOURCE: Riverdale	3d. LOCATED WITHIN CITY LIMITS <input type="checkbox"/> YES <input type="checkbox"/> NO	3e. TOWNSHIP: Thornton	3f. COUNTY: Cook	3g. ZIP CODE: 60627

4. ALL CORRESPONDENCE TO: (NAME OF INDIVIDUAL) Robert C. Pfeilsticker, Jr.	5. TELEPHONE NUMBER FOR AGENCY TO CALL: (412) 283-5741
6. ADDRESS FOR CORRESPONDENCE: <input checked="" type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input type="checkbox"/> EMISSION SOURCE	

THE UNDERSIGNED HEREBY CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE CORRECT AND CURRENT. BY AFFIXING MY SIGNATURE HERETO I FURTHER CERTIFY THAT I AM AUTHORIZED TO EXECUTE THIS DOCUMENT.

AUTHORIZED SIGNATURE(S): (B)

7. BY <u>Paul R. Pack</u> <u>1-30-81</u>	BY _____ DATE _____
SIGNATURE _____	SIGNATURE _____
Paul R. Pack	DATE _____
TYPED OR PRINTED NAME OF SIGNER	TYPED OR PRINTED NAME OF SIGNER
Vice President - Operations	TYPED OR PRINTED NAME OF SIGNER
TITLE OF SIGNER	TITLE OF SIGNER

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE COMPLIANCE PROGRAM. CLEARLY IDENTIFY THE GENERIC NAME OF ANY EQUIPMENT TO BE CONSTRUCTED OR SPECIFIED PURSUANT TO THIS PLAN.

(B) THIS MUST BE SIGNED IN ACCORDANCE WITH ILL. PESS., CHAPTER 2, PART 1, RULE 104(c)(2). IF THE PERSON SIGNING THE COMPLIANCE PROGRAM AND PROJECT COMPLETION SCHEDULE IS AUTHORIZED TO DO SO BY A RESOLUTION OF THE BOARD OF DIRECTORS, SUCH AUTHORIZATION WILL USUALLY COMPLY WITH THE BEFORE-MENTIONED RULE.

GENERAL INFORMATION

8. THE APPLICANT MUST SUBMIT A PROCESS FLOW DIAGRAM DEPICTING ALL RELATED EMISSION SOURCES AND ALL RELATED AIR POLLUTION CONTROL EQUIPMENT. THE DIAGRAM SHALL INCLUDE LABELS FOR EACH SOURCE AND EACH ITEM OF POLLUTION CONTROL EQUIPMENT, AND SHALL SET FORTH MAXIMUM FLOW RATES FOR (1) ALL RELATED PROCESSING EQUIPMENT, (2) ALL RELATED AIR POLLUTION CONTROL EQUIPMENT, (3) ALL RELATED EMISSION SOURCES AND (4) ALL RELATED STACKS OR VENTS. IF A PROCESS FLOW DIAGRAM HAS BEEN SUBMITTED WITH A PREVIOUS APPLICATION, THE APPLICANT MUST REFERENCE SUCH APPLICATION:

PERMIT NO.: See Addendum B

I.D. NO.: _____

9. THE APPLICANT SHALL SUBMIT A DETAILED DESCRIPTION OF THE EQUIPMENT HE PROPOSES TO CONSTRUCT TO COMPLY WITH THE ENVIRONMENTAL PROTECTION ACT AND APPLICABLE REGULATIONS. THIS DESCRIPTION SHALL INCLUDE THE FOLLOWING: THE TYPE OF PROPOSED AIR POLLUTION CONTROL EQUIPMENT OR PROPOSED AIR POLLUTION CONTROL TECHNIQUE WHICH HAS BEEN CHOSEN TO ACHIEVE COMPLIANCE; THE COST, AVAILABILITY, AND TECHNICAL REASONABLENESS OF THE PROPOSED AIR POLLUTION CONTROL EQUIPMENT OR PROPOSED AIR POLLUTION CONTROL TECHNIQUE, INCLUDING DETAILED COST ANALYSES AND COPIES OF ENGINEERING REPORTS OR STUDIES SUFFICIENT TO PROVE TO THE AGENCY THAT THIS OPERATION WILL BE IN COMPLIANCE WITH THE ACT AND APPLICABLE REGULATIONS. THIS EQUIPMENT SHALL BE CLEARLY LABELED ON THE PROCESS FLOW DIAGRAM.

10. COMPLETE ALL OF COLUMNS A AND B. COMPLETE COLUMN C AS APPLICABLE.

	A EXPECTED DATE ACTIVITY WILL BE COMPLETED	B LATEST DATE ACTIVITY WILL BE COMPLETED*	C ACTUAL DATE ACTIVITY WAS COMPLETED
a. STATE DATE THE APPLICANT WILL ENTER INTO A BINDING AGREEMENT TO MAKE NECESSARY PURCHASES OR MODIFICATIONS.	---	---	---
b. STATE DATE THE APPLICANT WILL APPLY FOR A CONSTRUCTION PERMIT FOR THE PROPOSED EQUIPMENT OR MODIFICATION OF EQUIPMENT.	---	---	---
c. STATE DATE THIS ITEM OF EQUIPMENT WILL BE DELIVERED (IF PRESENT EQUIPMENT IS TO BE MODIFIED, STATE DATE SUCH MODIFICATION SHALL BEGIN) TO THE APPLICANT'S FACILITY.	---	---	---
d. STATE DATE CONSTRUCTION OR MODIFICATION OF EQUIPMENT WILL BE COMPLETED.	---	---	---
e. STATE DATE APPLICANT WILL TEST EQUIPMENT TO DEMONSTRATE COMPLIANCE WITH THE ENVIRONMENTAL PROTECTION ACT AND SUBSTANTIVE REGULATIONS PROMULGATED THEREUNDER.	---	---	---
f. STATE DATE EQUIPMENT WILL BE FULLY OPERATIONAL.	7/31/81	8/31/81	---

NOTE: THE TIME BETWEEN THE SUBMISSION OF THIS FORM AND THE INITIAL EVENT LISTED IN ITEM 10 SHALL NOT EXCEED 6 MONTHS. THE TIME BETWEEN ANY TWO CONSECUTIVE EVENTS LISTED IN ITEM 10 SHALL NOT EXCEED 6 MONTHS.

*THE FINAL COMPLIANCE DATE SHALL BE NO LATER THAN THE APPLICABLE DATE SET FORTH IN PCB REGS., CHAPTER 2: AIR POLLUTION.

11. A PROJECT COMPLETION REPORT, APC-271, MUST BE SUBMITTED TO THE AGENCY FOR EACH INTERIM AND FINAL COMPLIANCE DATE LISTED IN COLUMN B. SUCH PROJECT COMPLETION REPORT MUST BE RECEIVED BY THE AGENCY NO LATER THAN 30 DAYS AFTER THE APPLICABLE INTERIM OR FINAL COMPLIANCE DATE.



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

<p style="text-align: center;">OPERATION DURING MALFUNCTION AND BREAKDOWN</p> <p>(WHERE OPERATION DURING MALFUNCTION OR BREAKDOWN EXCEEDS ALLOWABLE EMISSIONS)</p>	<p>FOR AGENCY USE ONLY</p>
--	----------------------------

1. NAME OF PLANT OWNER: Heckett, Div. of Harsco Corp.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): Plant No. 27
3. STREET ADDRESS OF EMISSION SOURCE: 13500 Perry Avenue	4. CITY OF EMISSION SOURCE: Riverdale
5. THE APPLICANT SHALL SUBMIT THE INFORMATION REQUESTED BY THIS FORM FOR EACH EMISSION SOURCE WHICH, DURING MALFUNCTION OR BREAKDOWN, MAY VIOLATE THE STANDARDS AND LIMITATIONS SET FORTH IN PCB REGS., CHAPTER 2, PART II.	

6. FOR EACH SUCH EMISSION SOURCE AND DIRECTLY RELATED EQUIPMENT, SUBMIT THE FOLLOWING INFORMATION AND ATTACH TO THIS APPLICATION AS EXHIBIT F:

- (a) DESCRIBE THE EXTENT TO WHICH DISCONTINUED OPERATION OF THIS EQUIPMENT WOULD: (A) CAUSE OR TEND TO CAUSE INJURY TO PERSONS OR SEVERE DAMAGE TO EQUIPMENT, OR (B) PREVENT THE APPLICANT FROM PROVIDING ESSENTIAL SERVICES TO THE PUBLIC.
- (b) STATE THE ANTICIPATED LENGTH OF TIME THE EQUIPMENT WILL CONTINUE TO OPERATE DURING THE MALFUNCTION OR BREAKDOWN, INCLUDING AN EXPLANATION WHY THIS LENGTH OF TIME IS NECESSARY.
- (c) DESCRIBE ALL MEASURES THE APPLICANT WILL TAKE TO MINIMIZE THE DURATION OF A MALFUNCTION OR BREAKDOWN.
- (d) DESCRIBE ALL MEASURES THE APPLICANT WILL TAKE TO MINIMIZE THE QUANTITY OF AIR CONTAMINANT EMISSIONS THAT MAY OCCUR DURING A MALFUNCTION OR BREAKDOWN.
- (e) IDENTIFY THE EMISSION SOURCE ON THE PROCESS FLOW DIAGRAM TO BE OPERATED DURING MALFUNCTION AND BREAKDOWN THAT EXCEEDS APPLICABLE STANDARDS AND LIMITATIONS.

TOTAL NUMBER OF PAGES IN EXHIBIT F: 1

ANALYSIS OF EXHAUST GAS TO THE AMBIENT AIR DURING MALFUNCTION AND BREAKDOWN					
CONTAMINANT	CONCENTRATION	OR	EMISSION RATE	METHOD OF MEASURE AND ANALYSIS	METHOD OF MONITORING
7. CARBON MONOXIDE	a.	PPM	b. LB/HR	c.	d. See Addendum B
8. ORGANIC MATERIALS	a.	PPM	b. LB/HR	c.	d.
9. HYDROGEN SULFIDE	a.	PPM	b. LB/HR	c.	d.
10. NITROGEN OXIDES	a.	PPM	b. LB/HR	c.	d.
11. SULFUR DIOXIDE	a.	PPM	b. LB/HR	c.	d.
12. PARTICULATE MATTER	a.	GR/SCF	b. LB/HR	c.	d.
13. OTHER (SPECIFY)	a.	PPM	b. LB/HR	c.	d.

14. EXIT GAS FLOW RATE: Not Applicable ACFM @ _____

15. IF OTHER EMISSION SOURCES OR AIR POLLUTION CONTROL EQUIPMENT ARE EXHAUSTED THROUGH THE STACK OR VENT SERVING THE EQUIPMENT COVERED BY THIS APPLICATION, THE APPLICANT SHALL DEFINE THE EMISSIONS FROM SUCH OTHER EQUIPMENT AND ATTACH INFORMATION TO THIS APPLICATION AS EXHIBIT G.

TOTAL NUMBER OF PAGES IN EXHIBIT G: Not Applicable

Heckett
Division of Harsco Corporation
Plant No. 27
Riverdale, Illinois 60627

Slag-Away Operation
Operation During Malfunction and Breakdown

EXHIBIT F

Permission is sought to continue the transfer of slag from the Interlake, Inc. Melt Shop to the Heckett slag processing pit, following the malfunction or breakdown of any slag transfer equipment or upsets in transfer schedules.

The operation for which a construction/operating permit application is being requested, involves the transfer of molten steelmaking process slag to the Heckett processing pit. The possibility exists that unavoidable delays may occur, which can result in the cooling and solidification of the slag, before transfer to the slag processing pit can be accomplished. To the best of our knowledge and belief, there is no equipment designed and manufactured for the purpose of remelting slag, prior to processing. Failure to remove the solidified slag from the slag pots would render the pots unusable for future use. We believe that the loss of these pots under these conditions falls within the meaning of "severe damage to equipment."

Therefore, we request permission to continue operations following a malfunction or breakdown of equipment or upset in transfer schedules for the purpose of transferring solidified slag to the Heckett processing pit.

Heckett
Division of Harsco Corporation
Plant No. 27
Riverdale, Illinois 60627

Slag-Away Construction/Operating Permit Application

ADDENDUM A

Heckett, as part of its services offered to Industry, processes and reclaims industrial by-products. Plant No. 27 is the result of a service contract with Interlake, Inc. to process and reclaim certain steelmaking by-products occurring at and located on property owned by Interlake, Inc. For reference purposes, Interlake's Riverdale Plant Illinois Environmental Protection Agency Air Pollution Control identification number is 031258AAI.

The subject of this application are the procedures for the transfer of steelmaking process slag from Interlake's Melt Shop, to the Heckett operated slag processing area.

Presently, molten slag is collected in slag pots and is allowed to cool and solidify before transfer to the Heckett processing pit. The Agency believes that the dumping of solidified slag into the processing pit results in fugitive emissions in excess of that allowed by Illinois Pollution Control Board Rules and Regulations, Chapter 2: Air Pollution. Rule 202: Visual Emission standards and limitations. The applicant, by making this submittal, makes no representation as to the validity of these allegations, nor should it be implied that the applicant is legally obligated to make such submittal or any part of it.

Heckett, in cooperation with Interlake, Inc., proposes to make the following operational changes, which will result in an operation known as "slag-away."

At Interlake's Melt Shop, molten slag will continue to be placed in vessels known as slag pots. An overhead crane will move the molten slag laden pots to a newly prepared transfer point within the west end of the melt shop. Interlake will also make such modifications as are necessary to railroad tracks and roadways as are required to facilitate the movement of slag pots between the Melt Shop and the Heckett processing area.

Heckett will obtain and use a specially modified transporter to move the molten slag laden slag pots from Interlake's Melt Shop to the Heckett processing pit. Heckett will also have a new transfer ramp and slag pouring incline plane installed at the

processing pit. The incline plane will extend downward from the transfer ramp to the bottom of the processing pit. In actual operation, the transporter will position the slag pot at the end of the transfer ramp, over the incline plane. The slag pot will then be mechanically rotated to allow the molten slag to flow onto the incline plane and down to the bottom of the processing pit. The slag will then be allowed to cool and solidify before traditional processing begins.

As occurs now, a layer of dry processed slag will be added to the bottom of the emptied slag pots, before the transporter returns the pots to the melt shop for reuse. This layer of slag insulates the bottom of the pots and prevents "burn outs," which is the melting through of the pots and the accidental release of molten slag. Such a release can result in injuries to persons and severe damage to equipment. Therefore, the slag pot insulating practice will be continued.

The slag-away operation is a relatively new fugitive emission control procedure. Our experiences at other locations within the United States indicates that in comparison with "cold slag" transfer, the slag-away procedure can offer significant reductions in fugitive emissions. Engineering calculations of anticipated emissions are included in this application in Addendum B.

A search of the Illinois Environmental Protection Agency Air Pollution Control permit application forms reveals that no forms are truly applicable to the slag-away operation. Therefore, we are providing the information, which is typical of the data required by the Agency forms:

1. The slag-away procedure is a batch-type operation.
2. A. Average operating time, under the presently depressed steel market conditions, is 16 hours/day, 7 days/week and 50 weeks/year.
B. Average operating time, under normal conditions, is 24 hours/day, 7 days/week and 50 weeks/year.
3. Maximum operating time is 24 hours/day, 7 days/week and 50 weeks/year.
4. Percent of annual throughput is 25 percent for each calendar quarter.
5. A. Average "raw material" throughput (see Item 2A) is 16 pots per day, with each slag pot containing approximately 15 tons of molten slag.
B. Average "raw material" throughput (see Item 2B) is 24 pots per day, with each slag pot containing approximately 15 tons of molten slag.
6. Maximum "raw material" throughput is 45 pots per day, with each slag pot containing 15 tons of molten slag.

Heckett
 Division of Harsco Corporation
 Plant No. 27
 Riverdale, Illinois 60627

Slag-Away Construction/Operating Permit Application

ADDENDUM B

Emission calculations for "cold" and molten slag dumping operations based on "Particular Emission Factors Applicable to the Iron and Steel Industry," EPA-450/4-79-028. September, 1979.

Average slag handled= 576 tons per day.

Operations= 7 days per week, 50 weeks per year.

Annual average throughput= (576x7x50)= 201,600 tons per year.

Cold Slag Emissions

Assumptions

- (S) Silt content = 5.3%
- (U) Mean wind speed= 10.3 MPH
- (h) Drop height= 6 feet
- (M) Moisture content= 0.92 percent
- (Y) Dumping device capacity= 330 cubic feet, or 13 cubic yards
- (d) Dry days per year= 250 days
- (f) Percent time wind exceeds 12 MPH= 35.6 percent
- (D) Duration of storage= 2 days

Table 13 Emission Factor Calculations

Load and Loadout

$$(2) .0018 \frac{\left(\frac{5.3}{5}\right) \left(\frac{10.3}{5}\right) \left(\frac{6}{10}\right)}{\left(\frac{.92}{2}\right) 2 \left(\frac{13}{6}\right)} = 0.010 \text{ lbs./ton}$$

File Maintenance and Traffic=

$$0.10 (1) \frac{\left(\frac{5.3}{5}\right) (250)}{(235)} = 0.113 \text{ lbs./ton}$$

Wind Erosion:

$$(0.05) \left(\frac{5.3}{5} \right) \left(\frac{250}{235} \right) \left(\frac{35.6}{15} \right) \left(\frac{2}{90} \right) = 0.003 \text{ lbs./ton}$$

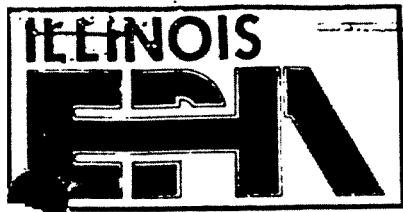
Total Emissions Factor: 0.126 lbs./ton

576 tons of slag handled per day = 24 tons/hr.
24 tons/hr. x 0.126 lbs./ton = 3.024 lbs./hr. present
uncontrolled emissions.

Slag-Away Emissions

There are no emission factors available for this operation. Therefore, based on visual observations and engineering judgment, emissions are decreased by 80 percent over cold slag operations.

$$3.024 \text{ lbs./hr.} \times (100\% - 80\%) = 0.605 \text{ lbs./hr.}$$



EA 1/10
Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

217/782-2113

RECEIVED
CHICAGO OFFICE

JOINT CONSTRUCTION AND OPERATING PERMIT

MAR 13 1981

Operating Permit Expiration Date: February 8, 1986

ENVIRONMENTAL PROTECTION AGENCY
STATE OF ILLINOIS

Application No.:	E1020019
I.D. No.:	031258AAS
Applicant's Designation:	27-5-5B
Received:	February 9, 1981
Construction & Operation of:	Slag-Away Operation
Location:	13500 Perry Avenue, Riverdale, Illinois

March 9, 1981

HECKETT, Division of Harsco Corporation
Post Office Box 1071
Butler, Pennsylvania 16001

Attention: Robert C. Pfeilsticker, Jr.

Gentlemen:

Permit is hereby granted to construct and operate the above-referenced equipment subject to standard conditions attached hereto and incorporated herein by reference.

Very truly yours,

Bharat Mathur, P.E.
Manager, Permit Section
Division of Air Pollution Control

BM:HMP:ct/2818h,1

cc: Region 1 *At 3-10-81*
HP 3-9

The permittee shall not continue operation during malfunction or breakdown beyond such time as is necessary to prevent injury to persons or severe damage to equipment or to provide essential services.



APPLICATION FOR OPERATING PERMIT RENEWAL 217/792-2113

OCTOBER 01, 1985

HECKETT ENGINEERING DIV OF HARSCO
ATTENTION: ROBERT C FEHLSTICKER
P.O. BOX 1071 612 W. MAIN
SUTLER, PENNSYLVANIA PA 15001

1000 CHURCHILL

NOV 07 1985

DEPA-CARC-SPFLD

APPLICATION NO: 31020019

TR. NUMBER: 031250119

OPERATION OF: SLAG BLAST

LOCATION: HECKETT ENGINEERING (HARSCO) PLANT BY
135TH ST AND DEERY AVENUE RIVERDALE, IL

IL 67027

THE ABOVE REFERENCED OPERATING PERMIT WILL EXPIRE ON FEBRUARY 28, 1986. THE AGENCY RECOMMENDS THAT YOU APPLY FOR A RENEWAL OF THIS OPERATING PERMIT AT LEAST NINETY (90) DAYS PRIOR TO ITS EXPIRATION.

IF YOUR OPERATION IS UNCHANGED, YOU MAY RENEW YOUR PERMIT BY SIGNING IN THE SPACE PROVIDED, KEEPING ONE COPY FOR YOUR RECORDS, AND RETURNING THIS COMPLETED FORM TO THE AGENCY. WHEN DATED AND SIGNED BY THE AGENCY THIS APPLICATION WILL BE YOUR PERMIT AND WILL BE RETURNED TO YOU.

THE AGENCY'S RECORDS INDICATE THAT THIS APPLICATION INCLUDES THE FOLLOWING EMISSION SOURCES AND CORRESPONDING CONTROL EQUIPMENT (IF ANY):

SNO. UNIT NO. SIZE (SQ. FT.) TYPE(S)
001 01 SLAG-BLAST PROCESS (HOT SLAG TRANSPORT/SLIPING)

IF YOUR OPERATION:

- 1) HAS BEEN MODIFIED; OR
- 2) HAS CHANGED FROM THE DESCRIPTION FILED WITH THE AGENCY; OR
- 3) INCLUDES EMISSION SOURCES OR CONTROL EQUIPMENT DIFFERENT FROM THAT WHICH IS GIVEN ABOVE;

THEN TO RENEW YOUR OPERATING PERMIT YOU MUST COMPLETE THE APPROPRIATE FORMS (SEE ENCLOSED REQUEST FOR PERMIT FOR ILL. AFD 211) AND APPLY FOR A RENEWAL WITH AN AFD 200 FORM.

IF THE OPERATION HAS BEEN PERMANENTLY DISCONTINUED OR PREVIOUSLY INCORPORATED INTO ANOTHER PERMIT, PLEASE ATTACH A LETTER TO THE AGENCY REFUNDING THIS PERMIT.

EXHIBIT 3



PAGE 2

ID NUMBER: 03125544AS
APPLICATION NO.: 51020019

I CERTIFY THAT THE ORIGINAL APPLICATION INFORMATION REMAINS TRUE, CORRECT, AND CURRENT AND THAT I AM AUTHORIZED TO EXECUTE THIS APPLICATION FOR PERMIT RENEWAL.

David L. McGee
SIGNATURE

NOV 4, 1985
DATE

DAVID L. MCGEE MANAGER QUALITY & ENVIRONMENTAL CONTROL
PRINTED NAME AND TITLE OF SIGNER

-----FOR AGENCY USE ONLY-----

PERMIT EXPIRATION DATE:

PERMIT IS GRANTED TO OPERATE THE ABOVE REFERENCED EQUIPMENT SUBJECT TO STANDARD CONDITIONS ATTACHED HERETO AND ANY SPECIAL CONDITIONS OF THE PREVIOUSLY GRANTED OPERATING PERMIT.

BRINAT MATYOP, P.E.
MANAGER, PERMIT SECTION
DIVISION OF AIR POLLUTION CONTROL

CC: REGION 102



217/782-2113

PERMIT DENIAL

CERTIFIED MAIL

P 5-94 5-53 5-31

December 11, 1985

Heckett Engineering Division of Hansco
Attention: Robert C. Pfeilsticker
Post Office Box 1071
612 N. Main
Butler, Pennsylvania 15001

<u>Application No.:</u>	61020019
<u>I.D. No.:</u>	03125CAAS
<u>Applicant's Designation:</u>	
<u>Received:</u>	November 7, 1985
<u>Operation of:</u>	SLAG AWAY
<u>Location:</u>	135th Street and Perry Ave., Riverview, IL

This Agency has reviewed your Application for Operating Permit for the above referenced project. The permit application is DENIED because Section 9 of the Illinois Environmental Protection Act, and 35 Ill. Adm. Code 201.142, 212.123 and 212.301 (formerly Rule 103(a)(1), 202(b) and 203(f)) might be violated.

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

Pursuant to 35 Ill. Adm. Code 201.142 (formerly Rule 103(a)(1)), a construction permit is to be obtained prior to constructing or modifying an air pollution emission source or control equipment. Information available to the Agency indicates that the equipment described in this application has been modified prior to the filing of this application. Consequently, your application for an operation permit is hereby DENIED.

Based upon the observations made by the Division of Air Pollution Control's field staff, the skulling operation, dry material dumping operation, pot lining operation and pit working operation have been in violation of fugitive particulate matter limitations, 35 Ill. Adm. Code 212.301 (formerly Rule 203(f)) and in addition excess opacity, greater than allowed by 35 Ill. Adm. Code 212.123 (formerly Rule 202), has been observed at these named operations.

The Agency will be pleased to re-evaluate your permit application on receipt of your written request and the necessary information and documentation to correct or clarify the deficiencies noted above. Two copies of this information must be submitted and should reference the application and I.D. numbers assigned above. The revised application will be considered filed on the date that the Agency receives your written request.

EXHIBIT 1

Page 2

If you have any questions concerning this denial, please contact L. H. Telford at 217/782-2115.

Sharet Mathur, P.E.
Manager, Permit Section
Division of Air Pollution Control

DL:AIT:ct/252PE,12-14

cc: Region 1