ATTACHMENT A

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.	)	

NOTICE OF SERVICE

To: See Attached Service List
(VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that I have today filed with the Illinois Pollution Control Board, the **PEOPLE'S MOTION FOR SUMMARY JUDGMENT ON ALL COUNTS OF COMPLAINT AGAINST RESPONDENT, NACME STEEL PROCESSING, LLC**

Respectfully submitted,

Nancy J. Tikalsky
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Environmental Bureau
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Date: May 16, 2014

THIS FILING IS SUBMITTED ON RECYCLED PAPER

SERVICE LIST

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Chicago, Illinois 60601

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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	)	
	)	
Respondent.	)	

CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that on May 16, 2014, I served true and correct copies of the **PEOPLE'S MOTION FOR SUMMARY JUDGMENT ON ALL COUNTS OF COMPLAINT AGAINST RESPONDENT, NACME STEEL PROCESSING, LLC**, upon the persons and by the methods as follows:

[First Class U.S. Mail]

Edward V. Walsh, III
ReedSmith LLP
10 South Wacker Drive
Chicago, Illinois 60606-7507

[electronically]

Bradley P. Halloran, Hearing Officer
Illinois Pollution Control Board
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Nancy J. Tikalsky
Assistant Attorney General
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69 West Washington Street, Suite 1800
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	)	(Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability company,	)	
	)	
	)	
Respondent.	)	

PEOPLE'S MOTION FOR SUMMARY JUDGMENT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois ("Complainant" or "State" or "People"), pursuant to Section 101.516 of the Illinois Pollution Control Board's ("Board") Procedural Regulations, 35 Ill. Adm. Code 101.516 and Section 2-1005 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-1005 (2012), hereby moves for summary judgment in favor of the People and against the Respondent, NACME STEEL PROCESSING, LLC ("Respondent" or "Nacme") on the issue of liability and civil penalties as alleged in the People's Complaint filed on September 5, 2012 ("Complaint") (hereto attached as Exhibit A). For the reason that the pleadings, depositions, admissions and affidavits show that there is no genuine issue as to any material fact, the Complainant is entitled to summary judgment on liability and civil penalties as a matter of law. In support thereof, Complainant states as follows:

I. INTRODUCTION

From at least April 16, 2002 through February 11, 2012, Respondent conducted pickling operations at its steel processing facility located at 429 West 127th Street, Chicago, Cook County, Illinois ("Facility"), a major source for air emissions, without a

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Title V Clean Air Act Permit Program ("CAAPP") permit or, in the alternative, a Federally Enforceable State Operating Permit ("FESOP") in violation of Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010). In 2001, the Illinois Environmental Protection Agency ("Illinois EPA" or "Agency") issued Nacme a State Operating Permit No. 96020074 for air emissions with an expiration date of October 25, 2005 ("Nacme's SOP").

During the relevant time period, April 16, 2002 through February 11, 2012, Nacme submitted FESOP applications and a construction application to the Agency attesting that Nacme's Facility was a major source with a potential to emit ("PTE") hydrochloric acid ("HCL"), a hazardous air pollutant ("HAP"), air emissions greater than 10 tons per year ("tpy"). Each application relied on reports from one of the following stack tests conducted at Nacme's Facility on the following dates: April 16, 2002, ("April 2002 Stack Test"), and December 21, 2006 ("December 2006 Stack Test").

October 18, 2005 was the first time Nacme submitted to the Agency a CAAPP application requesting a FESOP to conduct pickling operations at the Facility, which relied on Nacme's April 2002 Stack Test results ("2005 FESOP Application"). Nacme submitted its 2005 FESOP Application 3½ years *after* Nacme had obtained the results for its April 2002 Stack Test showing that the PTE HCL air emissions exceeded 10 tpy, and *after* the Agency determined Nacme's two prior SOP renewal applications submitted in 2005 to be incomplete for failure to provide: 1.) adequate emissions information to assess the Facility's HCL PTE, and 2.) justification for Nacme's proposed actual air emissions

factors for the HCL ("April 2005 Notice of Incompleteness" and "September 2005 Notice of Incompleteness").[1]

In the September 2005 Notice of Incompleteness, the Agency informed Nacme it was required to submit a CAAPP application because its PTE HCL air emissions exceeded 10 tpy for a single source during the April 2002 Stack Test, which qualified the Facility as a major source for purposes of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010). In the same notice, the Agency stated that Nacme needed to submit a construction permit application if it wanted the Agency to consider an increase in the maximum annual steel throughput process rate ("process rate") proposed in its 2005 FESOP Application because the process rate proposed in Nacme's 2005 FESOP application exceeded the previous process rates the Agency could consider for the 2005 FESOP application as follows: 1.) the process rate derives from Nacme's April 2002 Stack Test results, and 2.) the process rate the Agency permitted Nacme's SOP ("Process Modification").[2]

In its 2005 FESOP Application, Nacme proposed a FESOP which would permit the Facility to operate with a Process Modification. At that time, Nacme failed to submit a construction permit application for the Process Modification proposed in its 2005 FESOP Application. In December 2005, the Agency informed Nacme a construction permit would be required for the Agency to issue a FESOP with the Process Modification as proposed in Nacme's 2005 FESOP Application. At the same time, the Agency informed Nacme that it would need to conduct a stack test at the proposed process rate

1 Nacme's initial SOP renewal application received by the Agency on April 12, 2005 was determined to be incomplete by the Agency in a letter dated April 13, 2005. Nacme again submitted an SOP renewal application received by the Agency on September 12, 2005 in response to the April 2005 Notice of Incompleteness, which the Agency also determined to be incomplete in a letter dated September 20, 2005.
2 Nacme's 2005 FESOP application proposed a process rate of 85.6 tph while its April 2002 Stack Test shows that the stack test was conducted at a process rate of 33.3 tph.

because the April 2002 Stack Test resulted in a process rate below the process rate proposed in its 2005 FESOP Application.

In March 2007, Nacme submitted to the Agency a change request to its 2005 FESOP Application for a proposed Process Modification that equaled the process rate conducted during its December 2006 Stack Test ("2007 FESOP Application").[3] Although Nacme submitted a Fee Determination for Construction Permit Application with its request, Nacme failed to submit a construction permit application for the Process Modification. Once again, the Agency informed Nacme a construction permit would be required that included the equivalent Process Modification proposed in its 2007 FESOP Application because it was a change in process rate from Nacme's SOP.

On February 12, 2012, Nacme submitted a construction permit application for the Process Modification it requested in its 2007 FESOP Application. On April 26, 2012, the Agency approved and issued Construction Permit – NSPS Source No. 031600FWL ("2012 Construction Permit"). A special condition in the Construction Permit authorized Nacme to operate the equipment listed in the Construction Permit at the Facility with the proposed Process Modification until the Agency takes final action on the 2012 FESOP Application.

Nacme's Answer and Affirmative Defense of Nacme Steel Processing, LLC to the Complaint of the People of the State of Illinois ("Answer")(hereto attached as Exhibit B and incorporated herein), Nacme Steel Processing, LLC.'s Response to Complainant's First Request for Admission of Facts ("Nacme's Admission of Facts") (hereto attached as Exhibit C and incorporated herein), the Deposition of Britt Wenzel ("Wenzel

3 Nacme proposed a Process Modification from the current process rate of 33.3 tph in its 2005 FESOP application to a process rate of 119.9983 tph.

Deposition") (hereto attached as Exhibit D and incorporated herein), together with the People's affidavits by Valeriy Brodsky ("IEPA Brodsky's Affidavit) (hereto attached as Exhibit E and incorporated herein) and Tom Reuter ("IEPA Reuter Affidavit")(hereto attached as Exhibit F and incorporated herein), support this motion and establish all material facts necessary to prove Nacme's liability and the People's entitlement to penalties. Accordingly, because there is no genuine issue of material fact, the People are entitled to summary judgment and civil penalties as a matter of law.

II. PROCEDURAL HISTORY

On September 5, 2012, the People filed a one-count Complaint against Nacme alleging violations of the Act, 415 ILCS 5/1 *et seq*. The People allege that Respondent violated Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010). Specifically, the People allege Nacme 'Operated a Major Stationary Source without a Clean Air Act Permit Program permit' from at least April 16, 2002 through February 11, 2012.

On November 2, 2012, the People received service of Nacme's Answer, which had been filed with the Board on November 1, 2012.

On November 30, 2012, the People filed with the Board its Motion to Strike and Dismiss Respondent's Affirmative Defenses. On January 8, 2013, the Hearing Officer issued an Order granting the parties an agreed motion to allow Respondent to withdraw its affirmative defenses and file amended affirmative defenses to the Complaint. On January 16, 2013, the People received service by Nacme of its Amended Affirmative Defenses to the Complaint, which had been filed with the Board on January 15, 2013. On February 8, 2013, the People filed with the Board its Motion to Strike and Dismiss

Respondent's Amended Affirmative Defenses. On March 11, 2013, Nacme filed its Response to People's Motion to Strike and Dismiss Respondent's Amended Affirmative Defenses. On March 25, 2013, People filed its Motion for Leave to File Reply Instanter and Reply Brief in Support of Motion to Strike and Dismiss Respondent's Amended Affirmative Defenses, and on April 1, 2013, Nacme filed its Objection to State's Request to File Reply Brief in Support of Motion to Strike Affirmative Defenses. On June 6, 2013 the Board issued an order allowing Nacme's Amended Affirmative Defenses on Laches and Waiver only.

III. STATEMENT OF UNDISPUTED FACTS

The Agency is an administrative agency established in the executive branch of the State government by Section 4 of the Act, 415 ILCS 5/4 (2010), and charged, *inter alia*, with the duty of enforcing the Act. [Exhibit B, Answer ¶2]

Respondent, Nacme, is and has been a Delaware corporation registered in good standing with the Illinois Secretary of State and duly authorized to do business in the State of Illinois. [Exhibit B, Answer ¶3; Exhibit C, Nacme's Admission of Facts, Facts 1 and 2].

Nacme owns and operates a steel processing facility located at 429 West 127th Street, Chicago, Cook County, Illinois. [Exhibit B, Answer ¶3; Exhibit C, Nacme's Admission of Facts, Fact 1]

At the Facility, Nacme operates a continuous coil pickling line, comprised of four (4) pickling tanks in a turbo tunnel enclosure, and a four (4) stage washer. [Exhibit B, Answer ¶4; Exhibit C, Nacme's Admission of Facts, Fact 4] Emissions from the

pickling tanks and washer are vented to a Pro-Eco four tray scrubber ("scrubber"). [Exhibit B, Answer ¶4; Exhibit C, Nacme's Admission of Facts, Fact 3]

The pickling tanks, which can be heated to approximately 190 degrees Fahrenheit, utilize HCL at various concentrations in a dissolution process to remove impurities from hot rolled steel ("pickling"). [Exhibit B, Answer ¶5; Exhibit C, Nacme's Admission of Facts, Fact 4] After pickling, the steel goes through an aqueous based four stage washer ("washing"). [Exhibit B, Answer ¶5; Exhibit C, Nacme's Admission of Facts, Fact 4]

During the pickling and washing, air emissions are captured in ducts with a TurboTunnel enclosure and transported via piping to the scrubber. [Exhibit B, Answer ¶6] Additionally, pickling and washing tanks containing the HCL are equipped with covers to minimize exposure of HCL to the atmosphere when not in use. [Exhibit B, Answer ¶6; Exhibit C, Nacme's Admission of Facts, Fact 2]

On February 8, 2001, the Agency issued Nacme's SOP for control of its air emissions at the Facility. [Exhibit B, Answer ¶7] Nacme's SOP was issued as a condition of settlement of a permit appeal PCB 01-85. [Exhibit F1, IEPA Reuter Affidavit – Nacme's SOP, page 1, ¶1] Nacme's SOP expired on October 25, 2005. [Exhibit B, Answer ¶7; Exhibit F1, IEPA Reuter Affidavit – Nacme's SOP]

Nacme's SOP permitted a process rate at the Facility of 600,000 tpy[4] and an emission factor of 4.8 lbs of HCL per 1000 tons of steel throughput ("SOP emission factor")[Exhibit F1, IEPA Reuter affidavit – Nacme's SOP, page 1, ¶2]

On April 11, 2002, Nacme submitted an Operating Permit Revision Application with a cover letter requesting an operating permit revision and construction permit ("2002 Construction Permit Application"). [Exhibit F2, IEPA Reuter Affidavit – 2002

4 600,000 tpy/24 x 365 = 69 tph. [Exhibit E, IEPA Brodsky Affidavit ¶10]

Construction Permit Application] The 2002 Construction Permit Application addressed a modification to the Facility, installing a TurboTunnel enclosure, and requested an allowance to operate at a higher process rate of 750,000 tpy.[5] [Exhibit F2, IEPA affidavit – 2002 Construction Permit Application, page NMLP 0784]

On April 12, 2002, the Agency issued the 2002 Construction Permit to Nacme for the installation of an emissions tunnel and retesting of the modified steel pickling process. [Exhibit F3, IEPA Reuter Affidavit – 2002 Construction Permit] The 2002 Construction Permit allowed Nacme to operate with an emission factor of 4.8 and a process rate of 750,000 tpy for the purposes of stack testing only, which was greater than the process rate of 600,000 tpy permitted by Nacme's SOP. [Exhibit B, Answer ¶8; Exhibit F3, IEPA Reuter Affidavit – 2002 Construction Permit, page 1, ¶1; Exhibit F1, IEPA Reuter Affidavit – Nacme's SOP, page 1, ¶2]

On April 16, 2002, Nacme conducted the April 2002 Stack Test. [Exhibit B, Answer ¶9] The April 2002 Stack Test report indicated a process rate of 33.3 tons per hour ("tph").[6] [Exhibit E, IEPA Brodsky Affidavit, ¶3, (referencing Exhibit F4 IEPA Reuter Affidavit - April 2002 Stack Test, page IEPA FOIA 408); Exhibit F9, IEPA Reuter Affidavit - September 2005 Notice of Incompleteness, page 1, ¶2]

The April 2002 Stack Test resulted in PTE HCL air emissions of 95 tpy, which is greater than 10 tpy. [Exhibit E, IEPA Brodsky Affidavit, ¶¶4 and 10 (referencing average HCL controlled emissions found at F4, IEPA Reuter Affidavit - April 2002 Stack Test, 2.0 Summary of Results chart, page IEPA FOIA 402, line 2 and 6.0 Test Results

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5 750,000 tpy process rate divided by (24x365) = 85.6tph process rate. [See Exhibit E, IEPA Brodsky affidavit, ¶10]

6 33.3 tph process rate x (24x365) = 292,000 tpy process rate. [See Exhibit E, IEPA Brodsky affidavit, ¶10]

Summary, page IEPA FOIA 406, line 9; Exhibit F9, IEPA Reuter Affidavit - September 2005 Notice of Incompleteness, pages 1-2, ¶3)]

On May 16, 2002, the Agency denied Nacme's Operating Permit Application - Revised dated April 11, 2002 ("2002 Operating Permit Denial"). [Exhibit F5, IEPA Reuter Affidavit - 2002 Operating Permit Denial]

On April 4, 2005, the Agency received a permit renewal application for Nacme's SOP submitted by Nacme ("April 2005 SOP Renewal Application"). [Exhibit B, Answer ¶10; Exhibit F6, IEPA Reuter Affidavit - April 2005 SOP Renewal Application]

On April 13, 2005, the Agency issued a Notice of Incompleteness to Nacme's April 2005 SOP Renewal Application for failure to provide detailed calculations for the Facility's actual emissions and PTE of hazardous air pollutant, HCL, and failure to provide updated information on production rate and emissions based on its April 2002 Stack Test. [Exhibit F7, IEPA Reuter Affidavit, April 2005 Notice of Incompleteness, page 1, ¶¶1 and 2]

On September 12, 2005 the Agency received a second permit renewal application for Nacme's SOP submitted by Nacme ("September 2005 SOP Renewal Application"). [Exhibit B, Answer ¶12; Exhibit F8, IEPA Reuter Affidavit, September 2005 SOP Renewal Application]

In its September 2005 SOP Renewal Application, Nacme proposed a process rate of 750,000 tpy. [Exhibit F8, IEPA Reuter Affidavit – September 2005 State Operating Permit Renewal Application, page NMLP 0952]

In its September 2005 SOP Renewal Application, Nacme stated that the control efficiency of its scrubber was 99.90 % for particulate emissions and 99.90% for gaseous

emissions. [Exhibit F8, IEPA Reuter Affidavit - September 2005 SOP Renewal Application, NMLP 0950]

In its September 2005 SOP Renewal Application, Nacme proposed the basis of its controlled HCL air emissions to be calculated utilizing its SOP Emission Factor and its proposed 750,000 tpy process rate, instead of basing it on the most recent emission factor and process rate that resulted from the April 2002 Stack Test.[7] [Exhibit F8, IEPA Reuter Affidavit - September 2005 SOP Renewal Application, page NMLP 0953; Exhibit F1, IEPA Reuter Affidavit - Nacme's SOP, page 1, ¶2; Exhibit F4, IEPA Reuter Affidavit - April 2002 Stack Test, pages NMLP 0402, 0406 and 0408; Exhibit E, IEPA Brodsky Affidavit, ¶¶6 and 5; and Exhibit F9, IEPA Reuter Affidavit - September 2005 Notice of Incompleteness, page 1, ¶2]

On September 20, 2005, the Agency issued a Notice of Incompleteness to Nacme's September 2005 SOP Renewal Application for Nacme's failure to substantiate the proposed permit emission factor of 4.8 lbs/10^3 tons with the results from the April 2002 Stack Test; the emissions factor derived from the April 2002 Stack Test was 6.51 lbs/10^3 Tons. [Exhibit F9, IEPA Reuter Affidavit - September 2005 Notice of Incompleteness, page 1, ¶2; Exhibit F4, IEPA Affidavit - April 2002 Stack Test, pages NMLP 0402, 0406 and 0408; and Exhibit E, IEPA Brodsky Affidavit, ¶¶5 and 6]

In the September 2005 Notice of Incompleteness, the Agency notified Nacme that it required a construction permit because Nacme's September 2005 SOP Renewal Application proposed a Process Modification when it proposed a change in process rate to 750,000 tpy from the process rate of 292,000 tpy that was the result of Nacme's April

7 April 2002 Stack Test resulted in a 6.51 lbs/10^3 tons of steel emission factor and a 33.3 tph process rate. [See Exhibit E, IEPA Brodsky Affidavit, ¶¶5 and 3]

2002 Stack Test.[8] [Exhibit C, Nacme's Admission of Facts, Fact 9; Exhibit F9, IEPA Reuter affidavit –September 2005 Notice of Incompleteness, page 1, ¶1; Exhibit E, IEPA Brodsky Affidavit, ¶¶7 and 8]

In the September 2005 Notice of Incompleteness, the Agency notified Nacme that the Agency had determined that the estimated PTE for the HCL air emissions at the Facility was greater than 10 tpy of HCL from a single source. [Exhibit F9, IEPA Affidavit - September 2005 Notice of Incompleteness, page 1, ¶3] The Agency calculated the HCL PTE air emissions from information provided in Nacme's September 2005 SOP Renewal Application; specifically, Nacme's April 2002 Stack Test results show a PTE greater than 10 tpy of HCL from a single source. [Exhibit F9, IEPA Affidavit - September 2005 Notice of Incompleteness, page 1, ¶3; Exhibit E, IEPA Brodsky Affidavit, ¶¶4 and 10 ; 2005 FESOP Application, page NMLP 0291]

Accordingly, in the September 2005 Notice of Incompleteness, the Agency informed Nacme in writing that the Facility was operating as a major source and required a CAAPP permit or, alternatively, a FESOP. [Exhibit F9, IEPA Reuter Affidavit - September 2005 Notice of Incompleteness, Pages 1, ¶3]

On October 18, 2005, Nacme submitted to the Agency its 2005 FESOP Application. [Exhibit C, Nacme's Admission of Facts, Fact 16; Exhibit F10, IEPA Reuter Affidavit - 2005 FESOP Application] In its 2005 FESOP Application, Nacme proposed a process rate of 750,000 tpy, which was previously permitted by its 2002 Construction Permit, but for stack testing only, and which was greater than the process rate of 600,000 tpy permitted in Nacme's SOP or 292,000 tpy resulting from Nacme's April 2002 Stack Test. [Exhibit C, Nacme's Admission of Facts, Fact 9; Exhibit F10,

8 292,000 tpy, See FN 6.

IEPA Reuter Affidavit - 2005 FESOP Application, HAP Emissions Summary, page 6-2 (NMLP 0311); Exhibit F3, IEPA Reuter Affidavit – 2002 Construction Permit, page 1, ¶1; Exhibit F1, IEPA Reuter Affidavit – Nacme's SOP, page 1, ¶2]

On December 6, 2005, the Agency issued a notice of completeness determination of Nacme's 2005 FESOP Application ("December 2005 Notice"). [Exhibit F11, IEPA Reuter Affidavit – December 2005 CAAPP Application Completion Determination] In addition, in the December 2005 Notice, the Agency informed Nacme that "notwithstanding the completeness determination, the Agency may request additional information necessary to evaluate or take final action on the FESOP application." [Exhibit F11, IEPA Reuter Affidavit – December 2005 CAAPP Application Completion Determination, page1, ¶3]

In December 2005, the Agency informed Nacme that it could issue a FESOP with an HCL air emissions process rate no greater than 33.3 tph pursuant to its April 2002 Stack Test results but not at the HCL air emissions process rate of 85.6 tph proposed in Nacme's 2005 FESOP Application.[9] [Exhibit E, IEPA Brodsky Affidavit, ¶7; Exhibit F14, IEPA Reuter Affidavit – 2007 FESOP Application, page NMLP 0271, ¶2] Additionally, the Agency informed Nacme that it was required to submit a construction permit before the Agency could approve the change in process rate. [IEPA Brodsky Affidavit, ¶8]

Nacme admits that the Process Modification request in its 2005 FESOP Application and 2007 FESOP Application are modifications in its operation and that a modification in the existing operation requires a construction permit. [Wenzel Deposition, pages 22, 48, 78-79]

9 33.3 tph = 292,000 tpy; 85.6 tph = 750,000 tpy. [IEPA Brodsky Affidavit, ¶10]

On December 21, 2006, Nacme conducted its December 2006 Stack Test. [Exhibit B, Answer ¶18] The test resulted in an HCL air emissions process rate of 119.9983 tph. [Exhibit F13, IEPA Reuter Affidavit – 2007 FESOP Application, page 2, ¶3; and Exhibit F12, IEPA Reuter Affidavit – December 2006 Stack Test, Test Results Summaries page NMLP 0026]

On March 23, 2007, Nacme submitted its 2007 FESOP Application with a proposed Process Modification to operate at a process rate of 119.9983 tph, which exceeds the process rate of 69 tph of Nacme's SOP, it's most recent operating permit. [See Exhibit C, Nacme Admission of Facts, Fact 11; Exhibit F1, IEPA Reuter Affidavit – Nacme's SOP, page 2, ¶3; Exhibit F13, IEPA Reuter Affidavit – 2007 FESOP Application, page 2, ¶3; Exhibit E, IEPA Brodsky Affidavit, ¶10]

From December 2005 through at least January 24, 2012, when Nacme met with the People in a litigation prefiling meeting, the Agency requested Nacme submit a construction permit for the Process Modification requested in its 2007 FESOP Application. [See Exhibit E, IEPA Brodsky Affidavit, ¶8]

On or about February 12, 2012, Nacme submitted a construction permit application requesting the process modification of 120 tph, which was equivalent to the Process Modification requested in its 2007 FESOP Application. [See Exhibit E, IEPA Brodsky Affidavit, ¶9]

On April 26, 2012, the Agency issued the 2012 Construction Permit for the Facility with special condition 1c authorizing Nacme to operate at the Facility with the proposed Process Modification until the Agency took final action on the 2007 FESOP Application. [Exhibit F13, IEPA Reuter Affidavit – 2007 FESOP Application]

IV. LEGAL STANDARD FOR SUMMARY JUDGMENT

Section 101.516(b) of the Board's Procedural Regulations, 35 Ill. Adm. Code 101.516(b), provides as follows:

> b) If the record, including pleadings, depositions and admissions on file, together with any affidavits, shows that there is no genuine issue of material fact, and that the moving party is entitled to judgment as a matter of law, the Board will enter summary judgment.

Section 2-1005 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-1005 (2012), provides, in relevant part, as follows:

> Summary Judgments
>
> (a) For Complainant. Any time after the opposite party has appeared or after the time which he or she is required to appear has expired, a Complainant may move with or without supporting affidavits for a summary judgment in his or her favor for all or part of the relief sought.

Summary judgment is appropriate when the pleadings and depositions, together with any affidavits and other items in the record, show that there is no genuine issue of material fact and that the moving party is entitled to judgment as a matter of law. (*citing Dowd & Dowd, Ltd. v. Gleason*, 181 Ill. 2d 460, 693 N.E.2d 358 (1998).

The purpose of the summary judgment procedure is to aid in the expeditious resolution of a lawsuit. *Atwood v. St. Paul Fire & Marine Ins. Co.*, 363 Ill.App.3d 861, 863, 845 N.E.2d 68, 70 (2d Dist. 2006), *Olson v. Etheridge*, 177 Ill.2d 396, 404, 686 N.E.2d 563, 566 (1997). The purpose of a summary judgment proceeding is not to try an issue of fact, but to determine whether any genuine issue of material fact exists. *Happel v. Wal-Mart Stores, Inc.*, 199 Ill.2d 179, 186, 766 N.E.2d 1118, 1123 (2002). The use of summary judgment is encouraged under Illinois law. *Bolingbrook Equity I Limited*

Partnership v. Zayre of Illinois, Inc., 252 Ill.App.3d 753, 764, 624 N.E.2d 1287, 1295 (1st Dist. 1993).

A motion for summary judgment should be granted when the pleadings and affidavits reveal that there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law. *Balla v. Gambro, Inc.*, 145 Ill.2d 492, 508, 584 N.E.2d 104, 112 (1991).

In moving for summary judgment, the People rely, in part, on Respondent's admissions of certain material facts in its Answer and Response to Complainant's Requests to Admit. The Board's Procedural Regulations, 35 Ill. Adm. Code 101.516(b), and Supreme Court Rule 216 plainly allow requests for admission of any fact which is relevant, and ultimate facts fall within this broad category, *P.R.S. Int'l., Inc. v. Shred Pax Corp.*, 184 Ill.2d 224, 236, 703 N.E.2d 71, 77 (1998).

Given the proffered evidence and Respondent's material admissions, the legal and factual bases for the People's theories of liability are set forth as follows:

V. ARGUMENT-NO GENUINE ISSUE OF MATERIAL FACT

The Complaint and Answer filed in this cause, and Nacme's Response to the State's Requests to Admit, together with the People's affidavits, IEPA Brodsky's Affidavit and IEPA Reuter Affidavit, supporting this motion, establish all undisputed material facts necessary to prove Nacme violated Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010). Respondent's operations at the Facility are subject to the Act and the rules and regulations promulgated by the Board and the Agency. Accordingly, because there is no genuine issue as to any

material fact, the Complainant is entitled to summary judgment as a matter of law on Count I:

Summary Judgment as to Sections 9(b), 39.5(5)(x), and 39.5(6)(b) of the Act alleged: Nacme operated a CAAPP Facility and equipment without a CAAPP or FESOP permit

Complainant realleges and incorporates by reference into its Motion for Summary Judgment on Count I the foregoing sections of this Complainant's Motion for Summary Judgment entitled "Procedural History," "Statement of Undisputed Facts," and "Legal Standard."

From at least April 16, 2002 through at least February 11, 2012, Respondent operated pickling operations at its Facility, a major source for HCL air emissions, without a Title V CAAPP permit or, in the alternative, a FESOP. In fact, by Nacme's own attestation in its 2005 FESOP Application, 2007 FESOP Application, and 2012 Construction Permit submitted to the Agency, Nacme admits that the Facility's PTE for HCL, a HAP, air emissions have been and are greater than 10 tpy and that each of the aforementioned FESOP applications relied on one of following stack test results for the Facility: April 2002 Stack Test and December 2006 Stack Test. Accordingly, Nacme's FESOP applications are admissions that its Facility was a "major source" and required a FESOP permit to operate its Facility from at least April 16, 2002, when Nacme's April 2002 Stack Test results demonstrated the PTE of HCL, a HAP, at the Facility was 10 tpy or greater, through at least February 11, 2012, when the Agency received Nacme's 2012 Construction permit.

Additionally, the facts clearly show that Nacme's SOP was not a CAAPP, or in the alternative, a FESOP, that permitted Nacme, a "major source," to conduct pickling

operations at the Facility from at least April 16, 2002 through at least February 11, 2012. In fact, when Nacme failed to submit a CAAPP application after it learned from the results of the April 2002 Stack Test that its Facility was a "major source" for HCL air emissions, Nacme was no longer permitted to conduct pickling operations at is Facility.

In Count I of the Complaint, the People seek a finding that the Respondent violated Sections 9(b), 39.5(5)(x), and 39.5(6)(b) of the Act, 415 ILCS 5/9(b), 39.5(6)(b), 39.5(5)(x), and (2010), which provide as follows:

Section 9(b) of the Act, 415 ILCS 5/9(b) (2010), provides as follows:

> No person shall:
>
> (b) Construct, install, or operate any equipment, facility, vehicle, vessel, or aircraft capable of causing or contributing to air pollution or designed to prevent air pollution, of any type designated by Board regulations, without a permit granted by the Agency, or in violation of any conditions imposed by such permit;

Section 39.5(6)(b) of the Act, 415 ILCS 5/39.5(6)(b) (2010), provides as follows:

> Prohibition
>
> After the applicable CAAPP permit or renewal application submittal date, as specified in subsection 5 of this Section, no person shall operate a CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such a source has been timely submitted to the Agency.

Section 39.5(5) of the Act, 415 ILCS 5/39.5(5) (2010), provides, in pertinent part, as follows:

> Applications and Completeness.
>
> * * *
>
> x. ... The owner or operator of an existing source that has been excluded from the provisions of this Section under subsection 1.1 or paragraph (c) of subsection 3 of this Section and that becomes

subject to the CAAPP solely due to a change in operation at the source shall submit its complete CAAPP application consistent with this subsection at least 180 days before commencing operation in accordance with the change in operation.

Section 39.5(2) of the Act, 415 ILCS 5/39.5(2) (2010), provides, in pertinent part, as follows:

Applicability

a. Sources subject to this Section shall include:

i. Any major source as defined in paragraph (c) of this subsection.

* * *

c. For purposes of this Section the term "major source" means any source that is:

i. A major source under Section 112 of the Clean Air Act, which is defined as:

A. For pollutants other than radionuclides, any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit, in the aggregate, 10 tons per year (tpy) or more of any hazardous air pollutant which has been listed pursuant to Section 112(b) of the Clean Air Act, 25 tpy or more of any combination of such hazardous air pollutants, or such lesser quantity as USEPA may establish by rule.

Section 39.5(3) of the Act, 415 ILCS 5/39.5(3) (2010), provides, in pertinent part, as follows:

Agency Authority to Issue CAAPP Permits and Federally Enforceable State Operating Permits.

c. The Agency shall have the authority to issue a State operating permit for a source under subsection (a) of Section 39 of this Act, as amended, and regulations promulgated thereunder, which includes federally enforceable conditions limiting the "potential to emit" of the source to a level below the major source threshold for

that source as described in paragraph (c) of subsection 2 of this Section, thereby excluding the source from the CAAPP, when requested by the applicant pursuant to paragraph (u) of subsection 5 of this Section.

Section 3.315 of the Act, 415 ILCS 5/3.315 (2010), provides the following definition:

> "PERSON" is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

Section 3.165 of the Act, 415 ILCS 5/3.165 (2010), provides the following definition:

> "CONTAMINANT" is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

Section 3.115 of the Act, 415 ILCS 5/3.115, provides the following definition:

> "AIR POLLUTION" is the presence in the atmosphere of one or more contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life, to health, or to property, or to unreasonably interfere with the enjoyment of life or property. 415 ILCS 5/3.115 (2010)

Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010), provides, in pertinent part, the following definitions:

> "CAAPP" means the Clean Air Act Permit Program developed pursuant to Title V of the Clean Air Act.
>
> "CAAPP PERMIT"... means any permit issued, renewed, amended, modified, or revised pursuant to Title V of the Clean Air Act.
>
> "CAAPP SOURCE" means any source for which the owner or operator is required to obtain a CAAPP permit pursuant to subsection 2 of this Section.

"OWNER OR OPERATOR" means any person who owns, leases, operates, controls, or supervises a stationary source.

"POTENTIAL TO EMIT" means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by USEPA. This definition does not alter or affect the use of this term for any other purposes under the Clean Air Act, or the term "capacity factor" as used in Title IV of the Clean Air Act or the regulations promulgated thereunder.

"SOURCE" means any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and are under common control of the same person or persons under common control) and that belongs to a single major industrial grouping....

"STATIONARY SOURCE" means any building, structure, facility, or installation that emits or may emit any regulated air pollutant . . . .

"REGULATED AIR POLLUTANT" means the following:

* * *

(5) Any pollutant subject to a standard promulgated under Section 112 or other requirements established under Section 112 of the Clean Air Act, ...

Section 112(a) (6) of the Clean Air Act, 42 USC 7412(a)(6), provides, in pertinent part, the following definition:

(6) Hazardous air pollutant

The term "hazardous air pollutant" means any air pollutant listed pursuant to subsection (b) of this section.

Section 112(b) (List of Pollutants) of the Clean Air Act, 42 USC 12(b)(1), provides, in pertinent part, the following:

> (1) Initial list
>
> The Congress establishes for purposes of this section a list of hazardous air pollutants as follows:
>
> Hydrochloric acid

1. NACME is a "person."

Nacme was and is a limited liability company and, therefore, a "person" as that term is defined under Section 3.315 of the Act, 415 ILCS 5/3.315 (2010).

2. HCL is a "contaminant", "regulated air pollutant" and "hazardous air pollutant" whose presence in the atmosphere is "air pollution."

HCL volatilizes as a gas and particulate matter in air emissions at the Facility and is therefore, a "contaminant" as that term is defined under Section 3.165 of the Act, 415 ILCS 5/3.165 (2010). HCL is a "hazardous air pollutant" ("HAP") and a "regulated air pollutant," as those terms are defined by Section 112(b) (List of Pollutants) of the Clean Air Act, 42 USC 12(b)(1), and Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010), respectively. Accordingly, in sufficient quantities and of such characteristics and duration, HCL is injurious to human, plant, or animal life, to health, to property, and unreasonably interferes with the enjoyment of life or property, and, therefore, constitutes "air pollution" as that term is defined under Section 3.115 of the Act, 415 ILCS 5/3.115.

3. The operation of equipment at the Facility is capable of causing or contributing to air pollution or designed to prevent air pollution.

From April 16, 2002 through February 11, 2012, four (4) pickling tanks enclosed in a turbo tunnel enclosure, and a four (4) stage washer containing HCL, operating at the Facility have been and are equipment capable of emitting HCL emissions and causing or

contributing to air pollution. The scrubber and the TurboTunnel enclosure that capture air emissions from operations of the washing and pickling process have been and are equipment used to prevent HCL air emissions, a HAP and contaminant, from the Facility.

4. The Facility is a "source" and "stationary source" as those terms are defined in Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010), and a "major source" as that term is defined in Section 39.5(2)(c) of the Act, 415 ILCS 5/39.5(2)(c) (2010).

The Nacme Facility, which emits HCL air emissions, a HAP, and "regulated air pollutant," is a "stationary source" and "source" as those terms are defined under Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010). Beginning on at least April 16, 2002, when Nacme conducted its April 2002 Stack Test at the Facility that resulted in a change in Nacme's previously reported PTE of a single HAP, HCL, to greater than 10 tpy, through February 11, 2012, when Nacme submitted its CAAPP Construction Permit Application, the Facility was and is a "major source" as that term is defined under Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010).

5. Nacme failed to apply for and submit an application to the Agency for a CAAPP or, alternatively, a FESOP, at least 180 days before commencing operation in accordance with the change in operation at the Facility.

As a major source since at least April 16, 2002, Nacme was required to apply for and submit an application to the Agency for a CAAPP or, alternatively, a FESOP, at least 180 days before commencing operation in accordance with the change in PTE of its HCL emissions at the Facility. The Illinois EPA received Nacme's initial complete application for a FESOP on October 18, 2005, more than 3 years and 6 months after the Facility became a major source.

6. Nacme operated a CAAPP source without a CAAPP permit or timely submitting a complete CAAPP permit application for a major source to the Agency.

From at least April 16, 2002 through at least February 11, 2012, Nacme continued operating the Facility without a CAAPP or FESOP permit issued by the Agency. On December 6, 2005, the Agency responded to Nacme's 2005 FESOP Application with a request for additional information; specifically, the Agency requested Nacme to submit a construction permit application for the Process Modification it proposed in its 2005 FESOP Application. The plain language of the Section 201.102 of the Illinois Pollution Control Board's Regulations, 35 Ill. Adm. Code 201.102, states that increasing output is a Modification:

> "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. .... Emphasis added.*

Nacme admits that it intentionally did not provide the construction permit application as requested by the Agency because Nacme claims that a construction permit is not required for its FESOP applications. Yet, Nacme admits that the Process Modification is a modification and that modifications require a construction permit application. Thus, a construction permit is plainly required by law for the Agency to permit an increase in the maximum annual steel throughput permitted in Nacme's SOP, its most recent permit at the time of Nacme proposed the Process Modification it its 2005 FESOP Application and 2007 FESOP Application. Nevertheless, Nacme failed to submit a construction permit for over 6 years, even after several notifications from the Agency of its noncompliance

and the need to submit a construction permit application to obtain a FESOP with the Process Modification Nacme proposed.

By operating a major source without timely submitting an application within at least 180 days before commencing operation as a major source, and by operating a "major source" without a CAAPP permit, Nacme violated Section 39.5(5)(x) of the Act, 415 ILCS 5/39.5(5)(x) (2010), and, thereby, violated Sections 39.5(6)(b) and 9(b) of the Act, 415 ILCS5/39.5(6)(b) and 9(b) (2010).

VI. RELIEF REQUESTED

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, prays for the entry of summary judgment in its favor and against NACME STEEL PROCESSING, LLC on Count I of the Complaint for the reason that the pleadings, judicial admissions on file, and affidavits show that there is no genuine issue as to any material fact and that the People are entitled to summary judgment as a matter of law. Specifically, Complainant seeks an order:

1. Finding that Nacme violated Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010);

2. Ordering Nacme to cease and desist from any further violation of Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010);

3. Assessing against Nacme a civil penalty of One Hundred Thousand dollars ($100,000.00);

4. Ordering Nacme to pay all costs of this action, including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

5. Granting such other relief as this Board deems appropriate and just.

VI. REMEDY

Section 2(b) of the Act, 415 ILCS 5/2(b)(2010), provides:

> It is the purpose of this Act, as more specifically described in later sections, to establish a unified, state-wide program supplemented by private remedies, to restore, protect and enhance the quality of the environment, *and to assure that adverse effects upon the environment are fully considered and borne by those who cause them.* (emphasis added)

Impact on the Public Resulting from Respondent's Alleged Non-Compliance

Section 33(c) of the Act, 415 ILCS 5/33(c) (2006), provides as follows:

> In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:
>
> 1. the character and degree of injury to, or interference with the protection of the health, general welfare and physical property of the people;
>
> 2. the social and economic value of the pollution source;
>
> 3. the suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area involved;
>
> 4. the technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source; and
>
> 5. any subsequent compliance.

In response to these factors, the Complainant states the following:

1. The impact to the public resulting from Respondent's failure to timely apply for a CAAPP when it knew or should have known it was a "major soure" in connection with the pickling operations at its Facility resulted in the threat of air pollution

of HCL air emissions, a HAP, which threatened human health and the environment. Accordingly, the Illinois EPA's information gathering responsibilities were hindered by the Respondent's violations thereby threatening human health and the environment.

2. There is social and economic benefit to the facility.

3. Operation of the facility is suitable for the area in which it occurs.

4. Submitting a timely FESOP application prior to becoming a major source by changing operations at the site is both technically practicable and economically reasonable.

5. Respondent has subsequently complied with the Act and the Board regulations.

A civil penalty should be assessed against Nacme because of the potentially severe impact the threat of exposure to HCL air emissions, a HAP, had on human health and the environment.

Explanation of Civil Penalties Requested

Section 2(b) of the Act, 415 ILCS 5/2(b) (2006), provides:

> It is the purpose of this Act, as more specifically described in later sections, to establish a unified, state-wide program supplemented by private remedies, to restore, protect and enhance the quality of the environment, *and to assure that adverse effects upon the environment are fully considered and borne by those who cause them.* (Emphasis added.)

The principal reason for penalties for violations of the Act is to aid in enforcement. Punitive considerations are secondary. *Tri-County Landfill Company v. Illinois Pollution Control Board*, 41 Ill.App.3d 249, 353 N.E.2d 316, 325 (2nd Dist. 1976). The Board does grant motions for summary judgment and rules on civil penalties without sending the case to hearing. *See e.g. People v. Zachary Isaac et al*, PCB 11-58

(Sept. 20, 2012); *see also People v. Byrom Ward et al,* PCB 10-72 (July 7, 2011 and Nov. 17, 2011) (no hearing was held, but parties were asked to brief the issue of civil penalties), *People v. Roxana Landfill, Inc.*, PCB 12-123 slip op at 5 (May 3, 2012); *People v. Ogoco, Inc.*, PCB 06-16 (Sept. 21, 2006); *People v. Steve's Concrete & Excavating*, PCB 08-87 (Mar. 5, 2009); *People v. Payne Rogers & Black Gold International*, PCB 00-127 (Aug. 9, 2001).

Section 42(a) of the Act, 415 ILCS 5/42(a) (2010), provides in pertinent part, as follows:

> a) Except as provided in this Section, any person that violates any provision of this Act or any regulation adopted by the Board, or any permit or term or condition thereof, or that violates any order of the Board pursuant to this Act, shall be liable for a civil penalty of not to exceed $50,000 for the violation and an additional civil penalty of not to exceed $10,000 for each day during which the violation continues;

Section 42 of the Act provides guidance for calculating civil penalties for violations of the Act. The statutory maximums provided in the Act have been used as "a natural or logical benchmark from which to begin considering factors in aggravation and mitigation of the penalty amounts." *Illinois EPA v. Allen Barry*, Individually and d/b/a Allen Barry Livestock, 1990 WL 271319, 48 (Slip Op. May 10, 1990, PCB. 88-71).

Assuming for the sake of civil penalties calculation that the Respondent's violations of the statutory provisions alleged in the Complaint were committed from October 26, 2005 through January 31, 2012, the maximum statutory civil penalties that Section 42 of the Act, 415 ILCS 5/42 (2010) authorizes for these violations is $69,120,000.00. The statutory maximum is calculated as follows:

Count I

1 violation of Section 39.5(5)(x) of the Act	$50,000.00
Duration of 2299 days 10/26/2005-2/11/2012	$22,990,000.00
1 violation of Section 39.5(6)(b) of the Act	$50,000.00
Duration of 2299 days 10/26/2005-2/11/2012	$22,990,000.00
1 violation of Section 9(b)	$50,000.00
Duration of 2299 days 10/26/2005-2/11/2012	$22,990,000.00
Total	**$69,120,000.00**

Assuming for the sake of civil penalties calculation that the Respondent's violations of the statutory provisions alleged in the Complaint were committed from April 16, 2002 through February 11, 2012, the maximum statutory civil penalties that Section 42 of the Act, 415 ILCS 5/42 (2010) authorizes for these violations is $107,730,000.00. The statutory maximum is calculated as follows:

Count I

1 violation of Section 39.5(5)(x) of the Act	$50,000.00
Duration of 3586 days 4/16/2002-2/11/2012	$35,860,000.00
1 violation of Section 39.5(6)(b) of the Act	$50,000.00
Duration of 3586 days 4/16/2002-2/11/2012	$35,860,000.00
1 violation of Section 9(b)	$50,000.00
Duration of 3586 days 4/16/2002-2/11/2012	$35,860,000.00
Total	**$107,730,000.00**

Consideration of Section 42(H) Factors

Section 42(h) of the Act, 415 ILCS 5/42(h) (2010), provides:

> In determining the appropriate civil penalty to be imposed under ..., the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

1. the duration and gravity of the violation;

2. the presence or absence of due diligence on the part of Nacme in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;

3. any economic benefits accrued by Nacme because of delay in compliance with requirements, in which case the economic benefits shall be determined by the lowest cost alternative for achieving compliance;

4. the amount of monetary penalty which will serve to deter further violations by Nacme to otherwise aid in enhancing voluntary compliance with this Act by the violator and other persons similarly subject to the Act;

5. the number, proximity in time, and gravity of previously adjudicated violations of this Act by the violator.

6. whether Nacme voluntarily self-disclosed, in accordance with Subsection (i) of this Section, the non-compliance to the Agency; and

7. whether Nacme has agreed to undertake a "supplemental environmental project," which means an environmentally beneficial project that Nacme agrees to undertake in settlement of an enforcement action brought under this Act, but which Nacme is not otherwise legally required to perform.

In response to these factors, the Complainant states as follows:

1. The duration of the violations that are the subject of the Complaint are alleged by the People to have occurred at a minimum of a nearly ten year period from at least April 16, 2002 through February 11, 2012. The gravity of the alleged violation is egregious because of the length of time Nacme operated without the requisite CAAPP, despite the fact that it was a "major source" for air emissions of HCL as determined during its April 2002 Stack Test, and the several requests to Nacme from the Agency during this time period to provide a construction permit to the Agency so it could approve

and issue a FESOP based on Nacme's proposed Process Modifications in its FESOP applications.

On December 6, 2005, the Agency responded to Nacme's 2005 FESOP Application with a request for additional information; specifically, that Nacme submit a construction permit application for the Process Modification it was requesting in its 2005 FESOP Application. The plain language of the Act states that increasing of steel throughput is a modification. Nacme admits that it intentionally did not provide the construction permit application as requested by the Agency, even though the plain language of the law is clear for Nacme's proposed Process Modification. Nacme failed to submit a construction permit application for over 6 years after several notifications from the Agency of its noncompliance.

In addition, the April 2002 Stack Test conducted at Nacme's Facility demonstrated that PTE HCL air emissions were greater than 10 tpy, qualifying the Facility as a "major source" that required a CAAPP to operate. At no time before October 18, 2005, did Nacme submit a CAAPP application to operate its Facility.

2. For the aforesaid reasons in subsection 1 of this section, Nacme failed to demonstrate diligence toward returning to compliance after failing to submit a CAAPP application 3 ½ years after its April 2002 Stack Test resulted in PTE HCL air emission exceeding 10 tpy and, failing to submit a construction permit from October 2005 through January 2012, despite several requests by the Agency to submit a construction permit application. In fact Nacme outright refused to submit a construction permit application until it was notified of an impending lawsuit against the Respondent for noncompliance with the CAAPP.

3. There was no economic benefit resulting from the violations of the Complaint.

4. Although the maximum civil penalties is at least $107,730,000.00, the People believe that $100,000, less than .001% of the statutory maximum, is appropriate for the type of operations and the violations alleged in the Complaint and will serve to deter further violations by Nacme and other persons similarly subject to the Act and the Board Regulations, and otherwise aid in enhancing voluntary compliance with the Act and the Board Regulations.

5. To Complainant's knowledge, Nacme has had no previously adjudicated violations of the Act.

6. There was no self-disclosure by Respondent. In fact, Nacme intentionally chose not to comply with the Agency's repeated requests for a construction permit application required to issue the permit with the process rate Nacme proposed in its 2005 FESOP Application. Additionally, Nacme knew or should have known its PTE HCL air emissions during its April 2002 Stack Test exceeded 10 tpy and was negligent in applying for a CAAPP permit at that time.

7. a supplemental environmental program is not relevant where settlement is not being proffered.

These aggravating and mitigating factors provide guidance to the Board in determining the appropriate amount of a civil penalty in an environmental enforcement case. Accordingly, the People bring these factors to the Board's attention and request a civil penalty of $100,000.

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board grant its Motion for Summary Judgment against Nacme on Count I by finding Nacme violated Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010), award a civil penalty of $100,000, and take such other action as the Board believes to be appropriate and just.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS
by LISA MADIGAN
Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

ELIZABETH WALLACE, Chief
Environmental Bureau
Assistant Attorney General

BY: _____

Nancy J. Tikalsky
Assistant Attorney General
Environmental Bureau North
69 W. Washington, Suite 1800
Chicago, Illinois 60602
(312) 814-0608

Dated: May 16, 2014

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 A

COMPLAINT

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-** (Enforcement – Air)

NOTICE OF ELECTRONIC FILING

TO: Edward V. Walsh, III
ReedSmith LLP
10 South Wacker Drive
Chicago, Illinois 60606-7507

PLEASE TAKE NOTICE that today, September 5, 2012, I have filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following Complaint a true and correct copy of which is attached and hereby served upon you.

Pursuant to 35 Ill. Adm. Code 103.204(f), I am required to state that failure to file an answer to this Complaint within 60 days may have severe consequences. Failure to answer will mean that all allegations in the Complaint will be taken as if admitted for purposes of this proceeding. If you have any questions about this procedure, you should contact the hearing officer assigned to this proceeding, the Clerk's Office or an attorney.

CERTIFICATE OF SERVICE

I, Nancy J. Tikalsky, an Assistant Attorney General, do certify that a true and correct copy of the Complaint and Notice of Filing were sent by certified mail with return receipt requested to the persons listed on the Notice of Filing on September 5, 2012.

BY: _____
NANCY J. TIKALSKY

NOTIFICATION

YOU ARE HEREBY NOTIFIED that financing may be available through the Illinois Environmental Facilities Financing Act (20 ILCS 3515/1 *et seq.*) to correct the alleged pollution.

THIS FILING IS SUBMITTED ON RECYCLED PAPER

PEOPLE OF THE STATE OF ILLINOIS,
by LISA MADIGAN, Attorney General
of the State of Illinois

BY: _____

NANCY J. TIKALSKY
Assistant Attorney General
Environmental Bureau
69 W. Washington St., Suite 1800
Chicago, Illinois 60602
(312) 814-8567

Date: September 5, 2012

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

COMPLAINT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, on her own motion and at the request of the Illinois Environmental Protection Agency ("Illinois EPA"), complains of Respondent, Nacme Steel Processing, LLC ("Nacme"), as follows:

COUNT I

OPERATING A MAJOR STATIONARY SOURCE WITHOUT A CAAPP PERMIT

1. This count is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, on her own motion and at the request of the Illinois EPA, pursuant to Section 31 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(2010).

2. The Illinois EPA is an agency of the State of Illinois created by the Illinois General Assembly in Section 4 of the Act, 415 ILCS 5/4 (2010), and charged, *inter alia*, with the duty of enforcing the Act.

3. At all times relevant to this complaint, Respondent has been and is a Delaware limited liability corporation in good standing and duly authorized to do

business in the State of Illinois. Nacme owns and operates a steel processing facility located at 429 West 127th Street, Chicago, Cook County, Illinois ("Facility").

4. At the Facility, Nacme operates a ninety (90) ton per hour continuous coil pickling line, comprised of four (4) pickling tanks enclosed in a turbo tunnel enclosure, and a four (4) stage washer. Emissions from the tanks and washers are vented to a Pro-Eco four tray scrubber ("scrubber").

5. The pickling tanks, which are heated to approximately 190 degrees Fahrenheit, utilize hydrochloric acid ("HCL") at various concentrations in a dissolution process to remove impurities from hot rolled steel ("pickling"). After pickling, the steel goes through an aqueous based four stage washer ("washing").

6. During the pickling and washing, air emissions are captured in ducts and transported via piping to the scrubber. Additionally, pickling and washing tanks containing the HCL are equipped with covers to minimize exposure of HCL to the atmosphere when not in use.

7. On February 8, 2001, the Illinois EPA issued Nacme State Operating Permit No. 96020074 ("SOP") for control of its air emissions at the Facility. The SOP expired on October 25, 2005.

8. On April 12, 2002, the Illinois EPA issued revised construction permit No. 01040081 to Nacme for the installation of an emissions tunnel which required retesting of the modified steel pickling process and allowed Nacme to operate its steel pickling process with a rate greater than that allowed by the SOP for the purposes of stack testing only.

9. On April 16, 2002, Nacme conducted a stack test at its Facility ("April 2002 stack test"). The April 2002 stack test was based on a maximum steel process rate lower than the permitted steel process rate of Nacme's SOP and resulted in emissions greater than allowed by its SOP.

10. On April 4, 2005, Nacme submitted its SOP renewal application to the Illinois EPA ("April 2005 SOP renewal application").

11. On April 13, 2005, the Illinois EPA issued a Notice of Incompleteness to Nacme's April 2005 SOP renewal application for failure to provide a potential to emit ("PTE") calculation for HCL and to demonstrate eligibility for a state operating permit.

12. On September 12, 2005, Nacme submitted a second application for renewal of its SOP ("September 2005 SOP renewal application").

13. On September 20, 2005, the Illinois EPA issued a Notice of Incompleteness ("September 2005 Notice") to Nacme's September 2005 SOP renewal application for Nacme's failure to substantiate the requested permit limits with any stack testing results.

14. Additionally, Nacme was notified in the September 2005 Notice that it required a construction permit because its September 2005 SOP renewal application requested a modification consisting of an increase in the maximum steel process rate allowed by its SOP.

15. Finally, the Illinois EPA notified Nacme in its September 2005 Notice that Illinois EPA had determined that the estimated PTE for the HCL emissions at the Facility based on information provided in Nacme's September 2005 SOP renewal application was greater than 10 tons per year ("tpy") of HCL from a single source. Accordingly, Illinois

EPA informed Nacme in writing that it required a Clean Air Act Permit Program ("CAAPP") permit or, alternatively, a Federally Enforceable State Operating Permit ("FESOP").

16. On October 25, 2005, Nacme submitted to the Illinois EPA a CAAPP application with a request for a FESOP ("2005 FESOP application"). In its 2005 FESOP application, Nacme requested a maximum steel process rate greater than the maximum steel process rate allowed by Nacme's SOP.

17. On December 6, 2005, the Illinois EPA issued a notice of completeness determination of Nacme's FESOP application ("December 2005 Notice"). In addition, in the December 2005 Notice, the Illinois EPA informed Nacme that "notwithstanding the completeness determination, the Agency may request additional information necessary to evaluate or take final action on the FESOP application."

18. On December 21, 2006, Nacme conducted another stack test ("December 2006 stack test"). The test was conducted with a maximum steel process rate greater than the maximum steel process rate allowed by its SOP. Results of the test were reported to the Illinois EPA on February 2, 2007.

19. As of February 1, 2012, or a date better known to Respondents, Nacme has failed to submit a construction permit application for process modifications as an amendment to either its 2005 FESOP application or its 2007 FESOP application.

20. Section 9(b) of the Act, 415 ILCS 5/9(b) (2010), provides as follows:

> No person shall:
>
> (b) Construct, install, or operate any equipment, facility, vehicle, vessel, or aircraft capable of causing or contributing to air pollution or designed to prevent air pollution, of any type designated by Board regulations, without a permit granted by the Agency, or in violation of any conditions imposed by such permit;

21. Section 3.315 of the Act, 415 ILCS 5/3.315 (2010), provides the following definition:

> "Person" is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

22. Respondent is a "person" as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2010).

23. Section 3.165 of the Act, 415 ILCS 5/3.165 (2010), provides the following definition:

> "CONTAMINANT" is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

24. HCL is a "contaminant" as that term is defined in Section 3.165 of the Act, 415 ILCS 5/3.165 (2010).

25. Section 3.115 of the Act, 415 ILCS 5/3.115 (2010), provides the following definition:

> "AIR POLLUTION" is the presence in the atmosphere of one or more contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life, to health, or to property, or to unreasonably interfere with the enjoyment of life or property.

26. Because the Facility emits, or is capable of emitting, HCL, a contaminant, to the atmosphere, it is capable of causing or contributing to "air pollution" as that term is defined in Section 3.115 of the Act, 415 ILCS 5/3.115 (2010).

27. Section 39.5(6)(b) of the Act, 415 ILCS 5/39.5(6)(b) (2010), provides as follows:

> Prohibition
>
> After the applicable CAAPP permit or renewal application submittal date, as specified in subsection 5 of this Section, no person shall operate a CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such a source has been timely submitted to the Agency.

28. Section 39.5(5) of the Act, 415 ILCS 5/39.5(5) (2010), provides, in pertinent part, as follows:

> Applications and Completeness.
>
> * * *
>
> x. ... The owner or operator of an existing source that has been excluded from the provisions of this Section under subsection 1.1 or paragraph (c) of subsection 3 of this Section and that becomes subject to the CAAPP solely due to a change in operation at the source shall submit its complete CAAPP application consistent with this subsection at least 180 days before commencing operation in accordance with the change in operation.

29. Section 39.5(2) of the Act, 415 ILCS 5/39.5(2) (2010), provides, in pertinent part, as follows:

> Applicability
>
> a. Sources subject to this Section shall include:
>
> > i. Any major source as defined in paragraph (c) of this subsection.
> >
> > * * *
>
> c. For purposes of this Section the term "major source" means any source that is:
>
> > i. A major source under Section 112 of the Clean Air Act, which is defined as:
> >
> > > A. For pollutants other than radionuclides, any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit, in the aggregate, 10 tons per year (tpy) or more of any hazardous air pollutant which has been listed pursuant to Section 112(b) of the Clean Air Act, 25 tpy or more of any combination of such hazardous air pollutants, or such lesser quantity as USEPA may establish by rule.

30. Section 39.5(3) of the Act, 415 ILCS 5/39.5(3) (2010), provides, in pertinent part, as follows:

> Agency Authority to Issue CAAPP Permits and Federally Enforceable State Operating Permits.
>
> c. The Agency shall have the authority to issue a State operating permit for a source under subsection (a) of Section 39 of this Act, as amended, and regulations promulgated thereunder, which includes federally enforceable conditions limiting the "potential to emit" of the source to a level below the major source threshold for that source as described in paragraph (c) of subsection 2 of this Section, thereby excluding the source from the CAAPP, when requested by the applicant pursuant to paragraph (u) of subsection 5 of this Section.

31. Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010), provides, in pertinent part, the following definitions:

> "CAAPP" means the Clean Air Act Permit Program developed pursuant to Title V of the Clean Air Act.
>
> "CAAPP PERMIT"... means any permit issued, renewed, amended, modified, or revised pursuant to Title V of the Clean Air Act.
>
> "CAAPP SOURCE" means any source for which the owner or operator is required to obtain a CAAPP permit pursuant to subsection 2 of this Section.
>
> "OWNER OR OPERATOR" means any person who owns, leases, operates, controls, or supervises a stationary source.
>
> "POTENTIAL TO EMIT" means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by USEPA. This definition does not alter or affect the use of this term for any other purposes under the Clean Air Act, or the term "capacity factor" as used in Title IV of the Clean Air Act or the regulations promulgated thereunder.
>
> "SOURCE" means any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and are under common control of the same person or persons under common control) and that belongs to a single major industrial grouping....
>
> "STATIONARY SOURCE" means any building, structure, facility, or installation that emits or may emit any regulated air pollutant . . . .
>
> "REGULATED AIR POLLUTANT" means the following:
>
> * * *
>
> (5) Any pollutant subject to a standard promulgated under Section 112 or other requirements established under Section 112 of the Clean Air Act, ...

32. Section 112(a) (6) of the Clean Air Act, 42 USC 7412(a)(6), provides, in pertinent part, the following definition:

> (6) Hazardous air pollutant
>
> The term "hazardous air pollutant" means any air pollutant listed pursuant to subsection (b) of this section.

33. Section 112(b) (List of Pollutants) of the Clean Air Act, 42 USC 12(b)(1), provides, in pertinent part, the following:

> (1) Initial list
>
> The Congress establishes for purposes of this section a list of hazardous air pollutants as follows:
>
> Hydrochloric acid

34. HCL is a "hazardous air pollutant" ("HAP") and a "regulated air pollutant", as those terms are defined by Section 112(b) (List of Pollutants) of the Clean Air Act, 42 USC 12(b)(1), and Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010), respectively.

35. The Facility is a "source" and "stationary source," as those terms are defined in Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010).

36. Beginning on at least April 16, 2002, or on a date best known to Nacme, Nacme had changed its operations resulting in a PTE of a single HAP, HCL, of greater than 10 tpy, the major source threshold. Accordingly, the Facility is a "major source" as that term is defined in Section 39.5(2)(c) of the Act, 415 ILCS 5/39.5(2)(c) (2010).

37. As a major source since at least April 16, 2002, or a date better known to Nacme, Nacme was required to apply for and submit an application to the Illinois EPA for a CAAPP or, alternatively, a FESOP, at least 180 days before commencing operation

in accordance with the change in operation at the Facility. By operating a major source without timely submitting an application within at least 180 days before commencing operation as a major source, Nacme violated Section 39.5(5)(x) of the Act, 415 ILCS 5/39.5(5)(x) (2010), and, thereby, violated Sections 39.5(6)(b) and 9(b) of the Act, 415 ILCS5/39.5(6)(b) and 9(b) (2010).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against the Respondent, NACME STEEL PROCESSING, LLC:

1. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

2. Finding that Respondent violated Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010);

3. Ordering the Respondent to cease and desist from any further violations of Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010);

4. Ordering Nacme to immediately undertake the necessary corrective action that will result in a final and permanent abatement of violations of Sections 39.5(5)(x), 39.5(6)(b), and 9(b) of the Act, 415 ILCS 5/39.5(5)(x), 39.5(6)(b), and 9(b) (2010), including but not limited to securing a CAAPP or FESOP permit from the Illinois EPA that appropriately reflects the operations and emissions at the Facility;

5. Assessing against Nacme a civil penalty, pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2010), of Fifty Thousand Dollars ($50,000.00) for each violation of the Act, with an additional penalty of Ten Thousand Dollars ($10,000.00) for each day of violation;

6. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees, against Respondent; and

7. Granting such other relief as the Board deems appropriate and just.

PEOPLE OF THE STATE OF ILLINOIS,
LISA MADIGAN,
Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

By: Elizabeth Wallace
ELIZABETH WALLACE, Chief
Environmental Bureau
Assistant Attorney General

Of Counsel:

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

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 B

ANSWER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

NOTICE OF ELECTRONIC FILING

To: Nancy J. Tikalsky
Assistant Attorney General
Environmental Bureau
69 W. Washington St., Suite 1800
Chicago, Illinois 814-8567

John T. Therriault, Assistant Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

Bradley P. Halloran, Hearing Officer
Illinois Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

PLEASE TAKE NOTICE that today, November 1, 2012, I have filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following **Answer and Affirmative Defense of NACME Steel Processing, LLC, to the Complaint of the People of the State of Illinois**, a true and correct copy of which is attached and hereby served upon you.

Dated: November 1, 2012

Respectfully submitted,

NACME STEEL PROCESSING, L.L.C.,
Respondent

By: _____
One of Its Attorneys

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

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

ANSWER AND AFFIRMATIVE DEFENSE OF NACME STEEL PROCESSING, LLC, TO THE COMPLAINT OF THE PEOPLE OF THE STATE OF ILLINOIS

NACME STEEL PROCESSING, LLC, ("NACME") for and as its answer to the Complaint of the PEOPLE OF THE STATE OF ILLINOIS states as follows:

COUNT I

OPERATING A MAJOR STATIONARY SOURCE WITHOUT A CAAPP PERMIT

1. This count is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, on her own motion and at the request of the Illinois EPA, pursuant to Section 31 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(2010).

ANSWER: *NACME admits the State has brought a complaint on behalf of the People of the State of Illinois at the request of the Illinois Environmental Protection Agency ("IEPA"). NACME is without knowledge of the truth of the remaining allegations contained in paragraph 1 and on that basis denies such allegations. NACME further denies that the State is entitled to its requested relief.*

2. The Illinois EPA is an agency of the State of Illinois created by the Illinois General Assembly in Section 4 of the Act, 415 ILCS 5/4 (2010), and charged, *inter alia*, with the duty of enforcing the Act.

ANSWER: *NACME admits that the IEPA is an administrative agency of the State of Illinois. NACME denies that the State is entitled to its requested relief and is without knowledge of the truth of the remaining allegations contained in paragraph 2, and on that basis denies such allegations.*

3. At all times relevant to this complaint, Respondent has been and is a Delaware limited liability corporation in good standing and duly authorized to do business in the State of Illinois. Nacme owns and operates a steel processing facility located at 429 West 127th Street, Chicago, Cook County, Illinois ("Facility").

ANSWER: *Admitted.*

4. At the Facility, Nacme operates a ninety (90) ton per hour continuous coil pickling line, comprised of four (4) pickling tanks enclosed in a turbo tunnel enclosure, and a four (4) stage washer. Emissions from the tanks and washers are vented to a Pro-Eco four tray scrubber ("scrubber").

ANSWER: *NACME admits that a continuous coil pickling line at its Facility has the capacity to operate at 90 tons per hour. NAMCE admits the remaining allegations of paragraph 4.*

5. The pickling tanks, which are heated to approximately 190 degrees Fahrenheit, utilize hydrochloric acid ("HCL") at various concentrations in a dissolution process to remove impurities from hot rolled steel .("pickling"). After pickling, the steel goes through an aqueous based four stage washer ("washing").

ANSWER: *NACME admits that the pickling tanks are at times heated to approximately 190 degrees Fahrenheit. NACME admits the remaining allegations contained in paragraph 5.*

6. During the pickling and washing, air emissions are captured in ducts and transported via piping to the scrubber. Additionally, pickling and washing tanks containing the HCL are equipped with covers to minimize exposure of HCL to the atmosphere when not in use.

ANSWER: *Admitted.*

7. On February 8, 2001, the Illinois EPA issued Nacme State Operating Permit No. 96020074 ("SOP") for control of its air emissions at the Facility. The SOP expired on October 25, 2005.

ANSWER: *NACME admits that the IEPA issued to NACME a "State Operating Permit-Revised" number 96020074 with an "issued" date of February 8, 2001. NACME admits that the permit bears an "Expiration Date" of October 25, 2005. NACME denies that the permit expired on October 25, 2005. NACME further answers that the permit, which the State has failed to attach to its Complaint, speaks for itself and denies all allegations inconsistent therewith.*

8. On April 12, 2002, the Illinois EPA issued revised construction permit No. 01040081 to Nacme for the installation of an emissions tunnel which required retesting of the modified steel pickling process and allowed Nacme to operate its steel pickling process with a rate greater than that allowed by the SOP for the purposes of stack testing only.

ANSWER: *NACME admits that the IEPA issued to NACME a "Construction Permit-Revised", number 01040081 and bearing a "Date Issued" of April 12, 2002. NACME further answers that the referenced permit, which the State has failed to attach to its Complaint, speaks for itself and denies all allegations inconsistent therewith.*

9. On April 16, 2002, Nacme conducted a stack test at its Facility ("April 2002 stack test"). The April 2002 stack test was based on a maximum steel process rate lower than the permitted steel process rate of Nacme's SOP and resulted in emissions greater than allowed by its SOP.

ANSWER: *NACME admits that it conducted a stack test at its Facility as reported in a written "Gaseous Emissions Test" dated April 16, 2002 provided to IEPA. NACME further answers that the report speaks for itself and NACME denies all allegations inconsistent therewith.*

10. On April 4, 2005, Nacme submitted its SOP renewal application to the Illinois EPA ("April 2005 SOP renewal application").

ANSWER: *NACME admits that by letter dated March 23, 2005 it submitted to IEPA an APC 205A form for renewal of its state operating permit.*

11. On April 13, 2005, the Illinois EPA issued a Notice of Incompleteness to Nacme's April 2005 SOP renewal application for failure to provide a potential to emit ("PTE") calculation for HCL and to demonstrate eligibility for a state operating permit.

ANSWER: *NACME is without knowledge of the truth of the allegations contained in paragraph 11, further answering that the document upon which the State bases its allegations is not attached to the State's Complaint. On this basis NACME denies the allegations contained in paragraph 11.*

12. On September 12, 2005, Nacme submitted a second application for renewal of its SOP ("September 2005 SOP renewal application").

ANSWER: *NACME admits that on or about September 12, 2005, it submitted an application for renewal of its SOP.*

13. On September 20, 2005, the Illinois EPA issued a Notice of Incompleteness ("September 2005 Notice") to Nacme's September 2005 SOP renewal application for Nacme's failure to substantiate the requested permit limits with any stack testing results.

ANSWER: *IEPA's September 20, 2005 notice, which the State has failed to attach to its Complaint, speaks for itself and NACME denies all allegations inconsistent therewith.*

14. Additionally, Nacme was notified in the September 2005 Notice that it required a construction permit because its September 2005 SOP renewal application requested a modification consisting of an increase in the maximum steel process rate allowed by its SOP.

ANSWER: *IEPA's September 20, 2005 notice, which the State has failed to attach to its Complaint, speaks for itself and NACME denies all allegations inconsistent therewith. NACME*

further denies that an increase "in the maximum steel process rate allowed by its SOP" constitutes a "modification" that required the submittal of a construction permit.

15. Finally, the Illinois EPA notified Nacme in its September 2005 Notice that Illinois EPA had determined that the estimated PTE for the HCL emissions at the Facility based on information provided in Nacme's September 2005 SOP renewal application was greater than 10 tons per year ("tpy") of HCL from a single source. Accordingly, Illinois EPA informed Nacme in writing that it required a Clean Air Act Permit Program ("CAAPP") permit or, alternatively, a Federally Enforceable State Operating Permit ("FESOP").

ANSWER: *IEPA's September 20, 2005 notice, which the State has failed to attach to its Complaint, speaks for itself and NACME denies all allegations inconsistent therewith, further stating that the information submitted to IEPA in the September 2005 SOP renewal application was known to IEPA long before that time. .*

16. On October 25, 2005, Nacme submitted to the Illinois EPA a CAAPP application with a request for a FESOP ("2005 FESOP application"). In its 2005 FESOP application, Nacme requested a maximum steel process rate greater than the maximum steel process rate allowed by Nacme's SOP.

ANSWER: *NACME admits that by letter dated October 18, 2005 NACME submitted a FESOP application. NACME further answers that the application, which the State has failed to attach to its Complaint, speaks for itself and denies all allegations inconsistent therewith.*

17. On December 6, 2005, the Illinois EPA issued a notice of completeness determination of Nacme's FESOP application ("December 2005 Notice"). In addition, in the December 2005 Notice, the Illinois EPA informed Nacme that "notwithstanding the completeness determination, the Agency may request additional information necessary to evaluate or take final action on the FESOP application."

ANSWER: *NACME admits that IEPA issued a December 6, 2005 notice. The State has failed to attach the notice to its Complaint and the notice in any event speaks for itself and NACME denies all allegations inconsistent therewith.*

18. On December 21, 2006, Nacme conducted another stack test ("December 2006 stack test"). The test was conducted with a maximum steel process rate greater than the maximum steel process rate allowed by its SOP. Results of the test were reported to the Illinois EPA on February 2, 2007.

ANSWER: *NACME admits that it conducted a stack test on or about December 21, 2006 further answering that the process rate used was known to and approved by IEPA ahead of time. The December 2006 stack test report, which the State has failed to attach to its Complaint, speaks for itself and NACME denies all allegations inconsistent therewith.*

19. As of February 1, 2012, or a date better known to Respondents, Nacme has failed to submit a construction permit application for process modifications as an amendment to either its 2005 FESOP application or its 2007 FESOP application.

ANSWER: *NACME denies that it undertook "process modifications" and on this basis denies that it was required to apply for a construction permit.*

20. Section 9(b) of the Act, 415 ILCS 5/9(b) (2010), provides as follows:

> No person shall:
>
> (b) Construct, install, or operate any equipment, facility, vehicle, vessel, or aircraft capable of causing or contributing to air pollution or designed to prevent air pollution, of any type designated by Board regulations, without a permit granted by the Agency, or in violation of any conditions imposed by such permit;

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

21. Section 3.315 of the Act, 415 ILCS 5/3.315 (2010), provides the following definition:

> "Person" is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

22. Respondent is a "person" as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2010).

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

23. Section 3.165 of the Act, 415 ILCS 5/3.165 (2010), provides the following definition:

> "CONTAMINANT" is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

24. HCL is a "contaminant" as that term is defined in Section 3.165 of the Act, 415 ILCS 5/3.165 (2010).

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

25. Section 3.115 of the Act, 415 ILCS 5/3.115 (2010), provides the following definition:

> "AIR POLLUTION" is the presence in the atmosphere of one or more contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life, to health, or to property, or to unreasonably interfere with the enjoyment of life or property.

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

26. Because the Facility emits, or is capable of emitting, HCL, a contaminant, to the atmosphere, it is capable of causing or contributing to "air pollution" as that term is defined in Section 3.115 of the Act, 415 ILCS 5/3.115 (2010).

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

27. Section 39.5(6) (b) of the Act, 415 ILCS 5/39.5(6) (b) (2010), provides as follows:

> Prohibition
>
> After the applicable CAAPP permit or renewal application submittal date, as specified in subsection 5 of this Section, no person shall operate a CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such a source has been timely submitted to the Agency.

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

28. Section 39.5(5) of the Act, 415 ILCS 5/39.5 (5) (2010), provides, in pertinent part, as follows:

> Applications and Completeness.
>
> * * *
>
> x. ... The owner or operator of an existing source that has been excluded from the provisions of this Section under subsection 1.1 or paragraph (c) of subsection 3 of this Section and that becomes subject to the CAAPP solely due to a change in operation at the source shall submit its complete CAAPP application consistent with this subsection at least 180 days before commencing operation in accordance with the change in operation.

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

29. Section 39.5(2) of the Act, 415 ILCS 5/39.5(2) (2010), provides, in pertinent part, as follows:

> Applicability
>
> a. Sources subject to this Section shall include:

i. Any major source as defined in paragraph (c) of this subsection.

c. For purposes of this Section the term "major source" means any source that is:

i. A major source under Section 112 of the Clean Air Act, which is defined as:

A. For pollutants other than radionuclides, any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit, in the aggregate, 10 tons per year (tpy) or more of any hazardous air pollutant which has been listed pursuant to Section 112 (b) of the Clean Air Act, 25 tpy or more of any combination of such hazardous air pollutants, or such lesser quantity as USEPA may establish by rule.

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

30. Section 39.5(3) of the Act, 415 ILCS 5/39.5 (3) (2010), provides, in pertinent part, as follows:

Agency Authority to Issue CAAPP Permits and Federally Enforceable State Operating Permits.

c. The Agency shall have the authority to issue a State operating permit for a source under subsection (a) of Section 39 of this Act, as amended, and regulations promulgated thereunder, which includes federally enforceable conditions limiting the "potential to emit" of the source to a level below the major source threshold for that source as described in paragraph (c) of subsection 2 of this Section, thereby excluding the source from the CAAPP, when requested by the applicant pursuant to paragraph (u) of subsection 5 of this Section.

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

31. Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010), provides, in pertinent part, the following definitions:

"CAAPP" means the Clean Air Act Permit Program developed pursuant to Title V of the Clean Air Act.

"CAAPP PERMIT"... means any permit issued, renewed, amended, modified, or revised pursuant to Title V of the Clean Air Act.

"CAAPP SOURCE" means any source for which the owner or operator is required to obtain a CAAPP permit pursuant to subsection 2 of this Section.

"OWNER OR OPERATOR" means any person who owns, leases, operates, controls, or supervises a stationary source.

"POTENTIAL TO EMIT" means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by USEPA. This definition does not alter or affect the use of this term for any other purposes under the Clean Air Act, or the term "capacity factor" as used in Title IV of the Clean Air Act or the regulations promulgated thereunder.

"SOURCE" means any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and are under common control of the same person or persons under common control) and that belongs to a single major industrial grouping....

"STATIONARY SOURCE" means any building, structure, facility, or installation that emits or may emit any regulated air pollutant . .

"REGULATED AIR POLLUTANT" means the following:

> (5) Any pollutant subject to a standard promulgated under Section 112 or other requirements established under Section 112 of the Clean Air Act, ...

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

32. Section 112(a) (6) of the Clean Air Act, 42 USC 7412 (a) (6), provides, in pertinent part, the following definition:

> (6) Hazardous air pollutant
>
> The term "hazardous air pollutant" means any air pollutant listed pursuant to subsection (b) of this section.

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

33. Section 112 (b) (List of Pollutants) of the Clean Air Act, 42 USC 12 (b) (1), provides, in pertinent part, the following:

> (1) Initial list
>
> The Congress establishes for purposes of this section a list of hazardous air pollutants as follows:
>
> Hydrochloric acid

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

34. HCL is a "hazardous air pollutant" ("HAP") and a "regulated air pollutant", as those terms are defined by Section 112 (b) (List of Pollutants) of the Clean Air Act, 42 USC 12 (b) (1), and Section 39.5 (1) of the Act, 415 ILCS 5/39.5(1) (2010), respectively.

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

35. The Facility is a "source" and "stationary source," as those terms are defined in Section 39.5(1) of the Act, 415 ILCS 5/39.5(1) (2010).

ANSWER: *NACME answers that the portion of the Act quoted speaks for itself and denies that it is liable under any part of the Act.*

36. Beginning on at least April 16, 2002, or on a date best known to Nacme, Nacme had changed its operations resulting in a PTE of a single HAP, HCL, of greater than 10 tpy, the major source threshold. Accordingly, the Facility is a "major source" as that term is defined in Section 39.5(2) (c) of the Act, 415 ILCS 5/39.5(2) (c) (2010).

ANSWER: *Denied.*

37. As a major source since at least April 16, 2002, or a date better known to Nacme, Nacme was required to apply for and submit an application to the Illinois EPA for a CAAPP or, alternatively, a FESOP, at least 180 days before commencing operation in accordance with the change in operation at the Facility. By operating a major source without timely submitting an application within at least 180 days before commencing operation as a major source, Nacme violated Section 39.5(5) (x) of the Act, 415 ILCS 5/39.5(5) (x) (2010), and, thereby, violated Sections 39.5 (6) (b) and 9(b) of the Act, 415 ILCS5/39.5 (6) (b) and 9(b) (2010).

ANSWER: *NACME denies that it made any change in operation at the Facility as alleged. NACME denies the balance of paragraph 37 as stating a legal conclusion to which no response is required.*

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against the Respondent, NACME STEEL PROCESSING, LLC:

1. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

2. Finding that Respondent violated Sections 39.5(5) (x), 39.5(6) (b), and 9(b) of the Act, 415 ILCS 5/39.5(5) (x), 39.5 (6) (b), and 9(b) (2010);

3. Ordering the Respondent to cease and desist from any further violations of Sections 39.5(5) (x), 39.5(6) (b), and 9 (b) of the Act, 415 ILCS 5/39.5 (5) (x), 39.5 (6) (b), and 9(b) (2010);

4. Ordering Nacme to immediately undertake the necessary corrective action that will result in a final and permanent abatement of violations of Sections 39.5(5) (x), 39.5(6) (b), and 9 (b) of the Act, 415 ILCS 5/39.5 (5) (x), 39.5(6) (b), and 9 (b) (2010), including but not limited to securing a CAAPP or FESOP permit from the Illinois EPA that appropriately reflects the operations and emissions at the Facility;

5. Assessing against Nacme a civil penalty, pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2010), of Fifty Thousand Dollars ($50,000.00) for each violation of the Act, with an additional penalty of Ten Thousand Dollars ($10,000.00) for each day of violation;

6. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees, against Respondent; and

7. Granting such other relief as the Board deems appropriate and just.

WHEREFORE:

NACME requests that Complainant's complaint be dismissed with prejudice and that NACME be awarded its costs.

AFFIRMATIVE DEFENSES

Having fully answered the Complaint, NACME offers the following defenses in further response thereto:

First Defense (Valid Permit)

The State's Complaint fails to state a claim upon which relief can be granted because, among other things, at all times NACME held a valid state operating permit limiting its emissions to below major source thresholds and which, under applicable precedent, is federally enforceable.

Second Defense (Lack of Jurisdiction)

The IEPA did not issue and serve a violation notice upon NACME within 180 days after it became aware of the alleged violation as required by Section 31(a)(1) of the Illinois Environmental Protection Act. The State's allegation that the complaint is filed on its own motion is belied by the State's letter dated January 5, 2012 which states in relevant part: "The Illinois Environmental Protection Agency ("Illinois EPA") referred the above-referenced matter to the Office of the Attorney General for the initiation of an enforcement action". (See Exhibit A attached hereto) As a result, the Board lacks jurisdiction to hear the State's complaint.

Third Defense (Laches)

The State's Complaint is barred by the doctrine of laches because the IEPA has known for years, at least since 2000, of the facts underlying its claim, and has been in regular communication with NACME during that time, but failed without cause to act until now.

Fourth Defense (Waiver)

The State's claims have been waived, in whole or in part, because the IEPA knew or should have known of its purported enforcement rights against NACME, but relinquished those rights by failing to take action timely.

Fifth Defense (Estoppel)

The State's claims are barred, in whole or in part, by the doctrine of estoppel because the Agency regularly communicated with NACME, including thru numerous permit applications, stack tests and during inspections, and knew or should have known of the alleged violation, yet did not inform NACME that is was allegedly violating applicable requirements. Consequently, the IEPA impliedly authorized NACME's operations.

Sixth Defense (No Economic Benefit)

The alleged violation provided no economic benefit to NACME which always operated under and within the limitations of a valid state operating permit, thus no penalties as asserted are applicable.

Seventh Defense (No Harm to Environment)

The alleged violation caused no harm or threat of harm to the environment as NACME has always operated under and within the limitations of a valid state operating permit, thus no penalties as asserted are applicable.

Eighth Defense (No Aid to Enforcement of the Act)

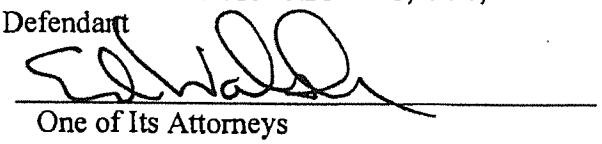
The alleged violation did not impair the IEPA's administration of its air permit program because NACME has always held a valid state operating permit, thus no penalties as asserted would aid in enforcement of the Act.

Ninth Affirmative Defense (No Potential to Emit)

NACME's facility has no potential to emit pollutants above the threshold for major source status as alleged by the IEPA because NACME's facility has a scrubber that is integral to the facility process that controls emissions to below major threshold status.

Respectfully submitted

NACME STEEL PROCESSING, LLC,
Defendant



One of Its Attorneys

Edward V. Walsh, III
REED SMITH LLP
10 South Wacker Drive
Chicago, Illinois 60606-7507
(312) 207-1000

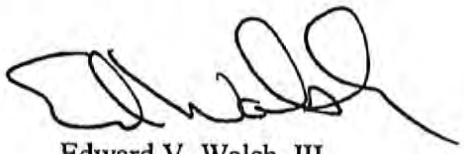
CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached **ANSWER AND AFFIRMATIVE DEFENSE OF NACME STEEL PROCESSING, LLC, TO THE COMPLAINT OF THE PEOPLE OF THE STATE OF ILLINOIS,** by U.S. Regular Mail, upon the following persons:

Nancy J. Tikalsky
Assistant Attorney General
Office of the Illinois Attorney General
Environmental Bureau
69 West Washington Street, Suite 1800
Chicago, Illinois 60602

Bradley P. Halloran, Hearing Officer
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

John T. Therriault, Assistant Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

By: 
Edward V. Walsh, III

Date: November 1, 2012

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 C

NACME'S ADMISSION OF FACTS

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. 2013 – 12** (Enforcement – Air)

NACME STEEL PROCESSING, INC's RESPONSE TO COMPLAINANT'S FIRST REQUEST FOR ADMISSION OF FACTS

Pursuant to applicable Board rules and Illinois Supreme Court Rules, Respondent NACME STEEL PROCESSING, Inc, ("NACME") states its objections and responses to the, PEOPLE OF THE STATE OF ILLINOIS' (the "State"), First Request for Admission of Facts, ("Requests"), as follows:

GENERAL OBJECTIONS

1. NACME objects to the Requests insofar as they purport to seek information which is protected from discovery by the attorney-client privilege and other applicable privileges protecting information from discovery.

2. NACME does not concede the relevancy of any information sought or disclosed in responding to the Requests.

3. NACME objects to the instructions and definitions in the Requests insofar as they require NACME to undertake investigation or produce information beyond what is required under Board rules.

4. No answer by NACME should be construed as a waiver of any objection.

REQUEST FOR ADMISSION OF FACTS

FACT NO. 1 From 2000 through January 31, 2012, NACME operated the Facility that processed steel.

RESPONSE: NACME denies this Request as to the period of on or about September 10, 2001 to on or about April 2, 2002. NACME admits the balance of the Request.

FACT NO. 2 From 2000 through January 31, 2012, operations at the Facility emitted HCL.

RESPONSE: NACME denies this Request as to the period of on or about September 10, 2001 to on or about April 2, 2002. NACME objects to the use of the undefined term "emitted". Subject to, and without waiving this specific and its general objections, NACME admits the balance of the Request.

FACT NO. 3 From 2000 through January 31, 2012, Emission Units at the Facility included a Pro-Eco four tray scrubber.

RESPONSE : NACME objects to the State's characterization of NACME's Pro-Eco four tray scrubber as an "Emission Unit" within the meaning included in the State's "Definitions". Subject to, and without waiving this specific and its general objections, NACME admits the Request.

FACT NO. 4 From 2000 through January 31, 2012, operations at the Facility include a continuous coil pickling line that had the capacity to operate at 90 tons per hour.

RESPONSE: NACME denies this Request as to the period of on or about September 10, 2001 to on or about April 2, 2002. NACME admits that its pickling line was capable of processing 90 tons of steel per hour during the balance of the stated time period.

FACT NO. 5 From 2000 through January 31, 2012, operations at the Facility include pickling tanks that have been heated to a maximum of 190 degrees Fahrenheit.

RESPONSE: NACME denies this Request as to the period of on or about September 10, 2001 to on or about April 2, 2002. NACME objects to the confusing form of the Request and subject to, and without waiving this specific and its general objections, NACME admits that the acid solution contained within the pickling tanks has been heated to 190 degrees Fahrenheit during

the stated time period.

FACT NO. 6 Based on the April 2002 stack test, operations at the Facility had the PTE greater than 10 tons per year of HCL emission.

RESPONSE: Denied.

FACT NO. 7 Respondent received a written correspondence titled 'Notice of Incompleteness' from the Illinois EPA dated April 13, 2005.

RESPONSE: Admitted.

FACT NO. 8 Respondent received a written correspondence titled 'Notice of Incompleteness' from the Illinois EPA dated September 20, 2005.

RESPONSE: Admitted.

FACT NO. 9 Respondent's October 2005 FESOP application, requested an increase in the maximum steel process rate greater than was allowed by its SOP.

RESPONSE: Admitted.

FACT NO. 10 Based on the December 2006 stack test, operations at the Facility had the PTE greater than 10 tons per year of HCL emission.

RESPONSE: Denied.

FACT NO. 11 Respondent's March 2007 FESOP application, requested an increase in the maximum steel process rate greater than was allowed by its SOP.

RESPONSE: NACME objects to the Request because it is premised on a characterization by the State and on an unproven fact upon which the State bears the burden of proof, that NACME made a "FESOP application" in March 2007. Subject to, and without waiving this specific and its general objections, NACME admits the Request.

FACT NO. 12 From January 2006 through February 1, 2012, NACME had not submitted a construction permit with its FESOP application as requested by the Illinois EPA in communications to NACME.

RESPONSE: Denied.

FACT NO. 13 Based on the April 2011 stack test, operations at the Facility had the potential to emit greater than 10 tons per year of HCL emission.

RESPONSE: Denied.

FACT NO. 14 NACME constructed a Turbo Tunnel enclosure for its Emission Unit at the Facility in 2002.

RESPONSE: NACME objects to the confusing form of the question, i.e. that NACME constructed a Turbo Tunnel "for its Emission Unit". Subject to and without waiving this or its general objections, NACME admits that it constructed a Turbo Tunnel enclosure at its Facility in 2002.

Respectfully submitted,

NACME STEEL PROCESSING, L.L.C.,

Respondent

By: _____
One of Its Attorneys

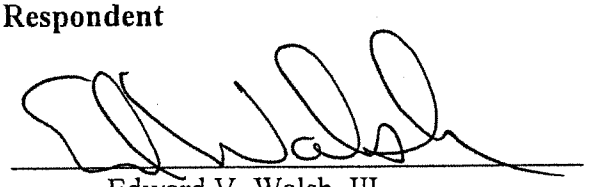
Edward V. Walsh, III
Reed Smith, LLP
10 South Wacker Drive
Suite 4000
Chicago, Illinois 60606
(312) 207-1000

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached **NACME STEEL PROCESSING L.L.C.'S RESPONSE TO COMPLAINANT'S FIRST REQUEST FOR ADMISSION OF FACTS**, by Email and U.S. Regular Mail, upon the following person:

Nancy J. Tikalsky
Assistant Attorney General
Office of the Illinois Attorney General
Environmental Bureau
69 West Washington Street, Suite 1800
Chicago, Illinois 60602

NACME STEEL PROCESSING, L.L.C.,
Respondent

By: 
Edward V. Walsh, III

Date: March 19, 2013

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	PCB No. 2013 – 12
v.	)	(Enforcement – Air)
	)	
	)	
NACME STEEL PROCESSING, LLC,	)	
	)	
Respondent.	)	

VERIFICATION

I, JOHN DuBROCK, being duly sworn, state that I am the General Manager of NACME Steel Processing, LLC's ("NACME") facility located at 429 West 127th Street, Chicago, Illinois. I have reviewed NACME's Response to Complainant's First Request for Admission of Facts and state that the responses set forth therein are true and accurate to the best of my knowledge and belief.

John DuBrock

Subscribed and sworn to before me, a notary public in and for said County and State, this 19 day of March, 2013.

Barbara J. Navaracy
Notary Public

My Commission Expires: 2.5.14

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 D

WENZEL DEPOSITION

Transcript of the Testimony of
BRITT E. WENZEL

Date: October 17, 2013

Case: PEOPLE OF THE STATE OF ILLINOIS VS. NACME PROCESSING, LLC

TOOMEY REPORTING
Phone: 312-853-0648
Fax: 312-853-9705
Email: toomeyrep@sbcglobal.net
Internet: http://www.toomeyreporting.com/

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS, Complainant,	)	
-vs-	)	PCB No. 2013-12 (Enforcement - Air)
NACME STEEL PROCESSING, LLC, A DELAWARE LIMITED LIABILITY CORPORATION, Respondent.	)	

Discovery deposition of BRITT E. WENZEL, taken before NANCY K. SPEARE, C.S.R. and Notary Public, pursuant to the Illinois Pollution Control Board rules and all other applicable rules pertaining to the taking of depositions for the purpose of discovery, at 69 West Washington Street, Chicago, Illinois, commencing at 1:30 p.m. on the 17th day of October, A.D. 2013.

There were present at the taking of this deposition the following counsel:

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OFFICE OF THE ATTORNEY GENERAL
ENVIRONMENTAL BUREAU by
MS. NANCY J. TIKALSKY and
MR. CHRISTOPHER J. GRANT
69 West Washington Street
Suite 1800
Chicago, Illinois 60602
(312) 814-8567,

on behalf of the Complainant;

REED SMITH, LLP by
MR. EDWARD V. WALSH, III
10 South Wacker Drive
40th floor
Chicago, Illinois 60606-7507
(312) 207-1000,
on behalf of the Respondent;
MR. DAVID G. SUSLER
1965 Pratt Boulevard
Elk Grove Village, IL 60007
(847) 806-7273,

on behalf of National Material, L.P.;
MS. MAUREEN WOZNIAK (via phone)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544,
on behalf of Illinois EPA.

Page 3

DEPOSITION OF
BRITT E. WENZEL
Taken: October 17, 2013

Page 4

BRITT E. WENZEL,
called as a witness herein, having been first duly sworn, was examined upon oral interrogatories and testified as follows:

EXAMINATION

by Ms. Tikalsky:

Q This is the discovery deposition of Britt Wenzel in the matter of People versus NACME Steel Processing, LLC, being taken pursuant to due notice given, the Illinois Pollution Control Board rules, the Illinois Supreme Court rules, and the Illinois rules of Civil Procedure.

Exhibit 1 is the notice of deposition, and that's all that happens with that one.

I'm going to ask you some questions to find out what you know about the facts --

A Okay.

Q -- that gives rise to this lawsuit, okay.

If you would state your name and spell it for the record.

A Sure, my name is Britt Ervine Wenzel, B-R-I-T-T, E-R-V-I-N-E, W-E-N-Z-E-L.

Q Just to go through some basics here: You need to speak your answers because the court

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reporter can't interpret sign language and nods and things like that. One person needs to speak at a time because she can't document both of us if we talk at the same time, and I'll remain cognizant of that too. Sometimes you get in conversation and try to understand how things work you can get carried away. So she'll remind us -- Right?

THE COURT REPORTER: Um-hum.

MS. TIKALSKY: Q If you do not hear a question, say so; and I will repeat it. If you don't understand a question, let me know; and I'll rephrase it, come at it a different way. And if you in an earlier answer you realize later on was not as accurate as it should have been you are free to change your answer. Just let me know and I'll let you change it because sometimes as we -- your recall comes into play as we have a conversation and looking at documents and things like that, okay. So if you don't know or don't remember information to answer just say so. If you -- So I will presume that if you answer a question you've heard it, you understood it, and you answered it as accurately and to the best of

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your ability that you have, okay.
A deposition is the equivalent of testimony in court, so you understand that that's important.
Are there any physical issues that would prevent you from remembering things or telling the truth?
A No.
Q You haven't had -- there's no medication, no alcohol, or drugs --
A No.
Q -- that would inhibit those issues? Okay.
At the end the court reporter types up -- she's recording everything -- and your counsel will likely reserve the right to review it and you can make changes. The changes are spelling errors, things like that. You can't actually change an answer when you review it later on, the transcript. So you, if you need to change an answer you need to do it during the deposition, okay.
Have you ever been deposed before?
A Once.

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Q And how long ago?
A Over a decade ago.
Q Okay, and was it in your capacity of work?
A Yes.
Q And what type of deposition was it?
A It was more related to a property transaction.
Q Okay, so it wasn't related to air --
A No, it was not.
Q -- pollution or an issuance of a permit or anything like that? Okay.
Did anyone help you prepare for your deposition today?
A Yes.
Q And who was that?
A Mr. Walsh.
Q Anyone else?
A No.
Q Did you review any documents in preparation for your deposition today?
A Yes.
Q And what documents?
A Some of the -- the initial violation response and some of the documents that we had submitted to the agency, air permits, some of the past air permits, also some of the exhibits.

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Q Which exhibits?
A The air permits, stuff like that where it was part of the exhibits.
Q Exhibits of today's deposition or earlier depositions that Mr. Walsh took?
A Today's.
Q I want to start out going through a little bit of your background, education. Where did you go to school post high school?
A Northern Illinois University.
Q Okay, and did you get a degree?
A Yes, in biological sciences.
Q And what type of degree, bachelor of science?
A Biological.
Q Biological --
A Science.
Q -- science?
A Yes.
Q So that doesn't relate to a B.S. or a B.A.?

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A A B.S.
Q Any post college?
A Yes, University of Wisconsin, I took courses for environmental auditing. So I became a certified environmental auditor and registered environmental manager. And that would have been in the mid-nineties.
I also had training through the U.S. Fish and Wildlife Service with regards to wildlife habitat management and wetland delineations and the U.S. Department of Agriculture in soil sciences.
Q The courses as the environmental auditor and registered environmental manager, what types of coursework, what kinds of information --
A Sure. Well, basically, went over federal regulations, you know, went through everything from waste management to, you know, air permitting and how to audit plants, facilities for compliance with those types of regulations, even got into polychlorinated biphenyl regulations and TSCA, Toxic Substance Control Act, import and export of chemicals.
Q T-S-C-A.

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And was there any other like training in relation to NESHAPS, toxic air?
A I am an ERMS account officer, Emission Reduction Market System, E-R-M-S. Basically, I received training through the Illinois EPA on that.
Q And when was that?
A Mid-nineties. I apologize, I don't know the exact date.
Q When did you graduate from Northern Illinois University?
A 1988.
Q Professional certifications, licenses -- the registered environmental manager is that a national or --
A Yes, it's a national license. I'm no longer up to date on that.
Q Okay, and environmental auditor was that a certificated license?
A It's a license, and I still haven't kept that up to date either.
Q Any other current licenses?
A No.
Q Certifications?

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A No.
Q Do you belong to any professional organizations?
A No.
Q Then moving onto your current occupation, what is it that you currently do, your title?
A I'm director of the Environmental Health and Safety for Mostardi Platt. I manage the Environmental Health and Safety Compliance Group of 12 professionals.
Q And how long have you had that position?
A Approximately, two years.
Q And what did you do before that?
A I was a manager of the Environmental Health and Safety Group. It is, essentially, the same position, just with a different title.
Q Reorganization?
A Pardon me?
Q Reorganization -- it's the same, just new title?
A Yeah, we just started -- we consolidate, you know, different groups a little bit; and so more people would have came underneath me that would report to me or I'd be their supervisor, so they just changed the position title.

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Q And how long were you manager?
A Approximately, six years.
Q And did you hold any other positions?
A Senior project manager.
Q And how long did you do that?
A Approximately, two, three years. Project manager before that, and I don't recall how long I was a project manager for that. And then I believe I started out as a staff technician.
Q When did you begin working with at Mostardi Platt?
A 1993.
Q So with NACME how long have you been contracted with NACME to provide the environmental --
A Since, approximately, mid-2000.
Q And is that just you, not Mostardi Platt, that you've been involved --
A No, it would have been other individuals that would have performed work per NACME.
Q Okay, but you would not necessarily have been aware of that work or you've reviewed the files prior to --

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MR. WALSH: I'd object to form.
MS. TIKALSKY: Q You can go ahead and answer. Do you understand it?
THE WITNESS: A Can you rephrase it?
Q Sure. Did you review the file, the NACME file, prior to the -- participating in work for them?
MR. WALSH: Same objection.
THE WITNESS: A I'm not sure I understand what you mean.
MS. TIKALSKY: Q How long has Mostardi Platt provided services for NACME?
A As far as I'm aware that is about the same time, mid-2000.
Q And what position did you hold when you were providing services to NACME, which one of the positions did you start with?
A Project manager, possibly senior project manager.
Q And at Mostardi Platt what do you do for them as the project -- senior project manager.
A I would, basically, oversee some projects, be the -- act as a project manager for some of the projects, and that is pretty much

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what I did.
Q What types of projects?
A It can be anything from waste management consulting, performing compliance audits, doing air permitting projects, spill planning, could have been waste water permitting, about the full gambit of the environmental stuff.
I also get involved in health and safety, so it might have been indoor air quality type of monitoring or safety reviews and audits; and I participated in the violation negotiations for my clients, response activities, agency liaison.
Q Anything else?
A I think that sums it up.
Q So you have experience working with the Illinois EPA?
A Yes.
Q What positions did you hold before you started at Mostardi Platt?
A I was a staff technician for Rust Environment and Infrastructure.
Q What did that involve?
A I performed compliance audits and

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developed environmental management systems for waste disposal facilities.
I also did wetland delineation.
Q Anything related to air?
A Some, minor. I got involved in more of the air quality on the exposure side.
Q Can you give me examples?
A For a hazardous waste landfill, you know, I would have been involved in projects that were determining whether there was any pollutants in the ambient air that could impact the local population or people.
Q So with Mostardi Platt, just to return to that, in the air work that you've done what types of air permits facilities -- I guess I better say what type of facilities have you worked with?
A Printing, steel pickling, candy manufacturing, flavor, plating, bakeries, welding, metal fabricating, landfills -- I'm sure there's more.
Q Right -- "Plating" like coating?
A Yeah, hard chrome plating or copper plating, metal coating operations -- bag manufacturers.

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Q Do you have -- does Mostardi Platt have like a contract that they execute with NACME or National Material?
A We, typically, operate on a time and materials basis. I don't believe we've entered into a formal liaison going consultations contract.
Q Would it be fair to say that it's as needed?
A Correct.
Q So if NACME or a company -- or NACME would receive something from the Illinois EPA and just send it to you, anticipating that you would just --
A Well, in some instances --
Q Um-hum.
A -- you know, I don't know if they send me everything.
Q Um-hum.
A You know, I just get involved when they've indicated that they need assistance.
Q Okay, so if there was just some kind of letter from the Illinois EPA out of the blue they would not necessarily just send it right to you?

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MR. WALSH: Object for lack of foundation.
MS. TIKALSKY: Q You can answer.
THE WITNESS: A I don't know the answer to that question.
Q If you know, if -- when you do work for Mostardi for NACME whether it's NACME that hires you or National Material?
A Well, I have contact with the NACME personnel. That's about all I can answer that.
Q Have you published any articles, professional articles or --
A Yes, I've published proactively managing environmental compliance; and I gave a presentation at the Air and Waste Management Association a number of years ago. I don't recall exactly when. That was done in Nashville, Tennessee.
Q Do you recall where your publication was published and the year?
A I'm not positively sure but I want to -- 1998. I'm not positive of that.
Q Do you know what publication?
A It was Air and Waste Management Association. So it was their annual conference.

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Q All right. I'm going to move on and just talk about some of the Illinois -- the Illinois air permitting process. Can you just tell me from your -- your knowledge explain the general process that you go through when you apply for a air permit for a company.

A Are you including just the paperwork filing or --

Q From the -- from the first step that you're notified that they need, a company is thinking they need an air permit --

A Sure --

Q -- and they come to --

A Well, first I question them on what their proposed activities are to, first of all, determine what they're proposing is even subject to permitting requirements, in other words, is it a regulated pollutant; and then after we clear that we discuss, you know, what their anticipated realm of current uses are, the process and what the raw materials are and what's in the raw materials. We discuss the types of process rates and the activities they want to perform, you know, with their objective, what are they going

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to produce from that; and then, if they already have a permit, I typically contact the permit engineer as listed on the permit to discuss the proposed project with them and, you know, and kind of gain a little bit of understanding of how they want the application process, you know, will work for them, with regards to applying for a permit. And I typically request a -- complete a construction permit application based upon my conversations with how the permit engineer would suggest that we proceed forward. I like to do that because I like to make the Illinois EPA aware of what we're doing with regards to that; and then we would, basically, complete the application and submit it to the agency.

Q And you talk about a construction permit, submitting a construction permit. Is that the application you're talking about?

A Yeah. There's also times when you're also submitting operating permit applications. It depends on the specific project that we're involved in.

Q With the air permit what -- can you explain the process of determining what the

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admissions will be or how you --

A Sure --

Q -- address that?

A Sure. I'm sorry, I didn't mean to interrupt you. It can be a mass balance equation; it can be through established emission factors; it can be through actual measurement of an emissions from a source.

Q You talk about measurement of a source. What exactly are you referring to?

A Well, stack testing.

Q And then emissions factors?

A Yes, there's established AP 42 emission factors for various types of operations that's established by the, you know, the database maintained by the US EPA, AP 42.

There's also a fire database that has other emission factors that are available.

Q And then mass balance, you said formula?

A Yes, you know, what goes in. Typically, that is used when you have coatings or inks or something like that, solvents in them where you're drying the entire liquid substrate, so you know that everything's being emitted to the

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atmosphere so you can accurately count the emissions.

Q Do you get involved with any recommendations of emissions equipment or a unit?

A Somewhat. But what I typically do is there's companies that are, you know, design and sell those, so I have resources and contacts where I would point my client into the direction where they -- they're the experts of this equipment, contact them to discuss that.

Q With stack tests can you tell me is it necessarily required to do a stack test in order to determine emissions, actual emissions type --

A Can you rephrase that a little bit?

MR. WALSH: I'm going to object to form.

MR. GRANT: He beat you to it.

MS. TIKALSKY: Q When would you use a stack test for?

THE WITNESS: A Well, if I did not -- it depends on the circumstances, of course, and all the little nuances in a project; but, generally, if mass balance equations didn't work and emission factors were not available or if the factors that were available were what I consider

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conservative or exceedingly high and did not really match what the actual emissions from a process are.
Q And when you complete an application for a construction permit what would be the purpose for applying for a construction permit?
A Well, if you have a source of regulated pollutants you're required to obtain a construction permit, unless there's a specific exemption for that source. So prior to construction of that source you would need to apply and obtain a construction permit from the Illinois EPA.
Q What other reasons would a construction permit be necessary?
A If -- if you wanted to modify your existing source.
Q What are some examples of modification?
A You could add an additional unit to a printing press, you could maybe add an emission control unit, you could increase or want to increase your throughput.
THE COURT REPORTER: "Your" what, I'm sorry?
THE WITNESS: Your throughput, material

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throughput. It would depend on the, you know, situation.
MS. TIKALSKY: Q Is there anything else that you might need a construction permit too?
THE WITNESS: A Not that I can think of right now.
Q Does a company need a construction permit to do a stack test?
A No.
Q Are there situations in which they would need a construction permit to do a stack test?
A No, not that I'm aware of.
Q So if they were going to increase what their current permit allows for throughput of material --
THE COURT REPORTER: I'm sorry, I coughed and couldn't hear -- "to increase what their current permit" --
MS. TIKALSKY: Material throughput -- they -- and if that part's the stack test.
THE WITNESS: A Can you rephrase that? I'm a little mixed up.
Q So they want to do a stack test to show emissions based on an increased throughput of

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their current operating permit would they need a construction permit for that?
MR. WALSH: Object to form.
THE WITNESS: A I'm not sure I understand the question.
MS. TIKALSKY: Q Okay. Well, let's say there's -- they have an operating permit, they have a limit of how much material they can throughput. Is that a reasonable assumption about an operating permit limit -- might be this material throughput?
MR. WALSH: Same objection.
THE WITNESS: A I'm still -- I --
MS. TIKALSKY: Q Okay --
A -- I still, I still don't --
Q So operating permits --
A Okay.
Q -- what limitations are set in an operating permit?
A Well, it could be a number of different things.
Q And what would that be?
A It could be material throughput, operating hours, emissions, levels and rates.

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Q So it's throughput, they have a limit of how much throughput?
A Not all permits.
Q Right, but this operating permit does?
A What --
Q If it does.
A -- operating permit?
MR. WALSH: Object to form.
THE WITNESS: Which --
MS. TIKALSKY: Q Okay, an operating permit has a limit on a throughput, material throughput, they have a limit?
THE WITNESS: A Some do; some don't.
Q Right. If they do have a limit and they want to operate higher than that limit --
A Okay.
Q -- okay -- how would they go about getting a permit to allow them to do that?
A If they wanted to increase? I apologize, still I'm not sure I quite understand your question.
Q Okay. If their operating permit has a throughput limit and they want to increase that throughput limit, what do they need to do?

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A They would typically need to, if they want to increase it, apply to obtain an increase if the permit has a limitation in it.
Q Okay, so they just -- what would they do, do an application for an operating permit, application for a construction permit, what would they need to do?
A Well, you do a construction permit application or a permit modification request.
Q Okay.
A I've seen the agency approach it two different ways.
Q All right. And what would the construction permit, what would be the purpose of that?
A What would be purpose of a construction permit application?
Q Right.
A I'm not sure -- I guess it would be to request an increase in your throughputs.
Q And what's required in the construction permit to make that request?
A Nothing's required in the construction permit to make the request. It's in the

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regulations.
Q Okay, so if -- so how would you determine what their emissions would be in a situation like that?
A It all depends on the situation. You could use emission factors. You could use regulatory limits. You could use mass balance equation. There's a number of different ways.
Q Is it possible you would do a stack test?
MR. WALSH: Object to the form.
THE WITNESS: A In some instances. It depends on the situation you were in and whether other ways to calculate emissions are available.
MS. TIKALSKY: Q So stack test isn't an option?
A Could you please say that again.
Q So, in response, you're stating a stack test is not an option --
MR. WALSH: Object, mischaracterizes his testimony.
MS. TIKALSKY: Q -- for the material throughput?
THE WITNESS: A I did not say that.
Q Okay, what did you say?

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A I said it's one of the options.
Q Okay, thank you.
When -- when a construction permit is submitted do you have any involvement implementing that permit? Would you have involvement?
MR. WALSH: Object to form.
THE WITNESS: A What do you mean by "implementing"?
MS. TIKALSKY: Q Well, when a company gets a construction permit what do they do?
MR. WALSH: Same objection.
THE WITNESS: A Well, they would start constructing their source --
MS. TIKALSKY: Q And would you have any involvement --
A -- under normal circumstances.
No, I typically do not get involved in their construction activities on-site.
Q When a company has an operating permit and they want to make some revisions to it what's the process with the Illinois air permit?
A Well, what's the process that I would -- I use?

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Q Yes.
A The first thing I always do is contact the permit engineer to discuss the process with him. Then we typically file for a modification request or a construction permit application, depending on how the permit engineer responds to questions about the permit.
Q What form does the modification request take?
A Well, it's -- you're filling out the paperwork, the forms.
Q It's not just a letter that requests --
A No, typically, you're filling out forms also with a paperwork exercise.
Q For air permits what types of air permits could you tell me exist with the Illinois --
MR. WALSH: Object to form.
THE WITNESS: A What do you mean, exist with the Illinois EPA --
MS. TIKALSKY: Q Yeah, the Illinois Environmental Protection Act, what types of permits.
A A construction permit, there's a lifetime operating permit, I've seen operating permits,

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there's Federally Enforceable State Operating Permits, or FESOPs, and there's Title Five permits.
Q And would you -- Title Five permits also referred to cap permits?
A I've seen it used in that sense.
Q And is a Federally Enforceable State Operating Permit -- what application do you fill out?
A Well, I've seen it done numerous ways. There's certain forms that you can use. I've done it both ways using standard APC forms or the cap forms.
Q What's a standard APC form?
A It's just a form that requests company information, process information; it could be another form that requests process information; it could be, you know, a form -- there's that APC form that requires you to provide ownership information.
Q And what's your understanding about the Federally Enforceable State Operating Permit program, is that -- I guess just to talk about that -- is that under the Title Five program?

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A Well, I look as at it as under the entire permitting program.
Q Well, I -- You said there were several different kinds of permits, the construction permit, the lifetime operating permit, sometimes operating permits, then there's the Title Five and there's the FESOP. So I would consider that the entire -- I would consider that all the permitting programs; but there are subsets.
MR. WALSH: Okay, I'm going to object to that. You're testifying. I also object to the extent it calls for a legal conclusion.
THE WITNESS: A I guess -- I'm not a lawyer -- I don't get into the legal aspects of all of that.
MS. TIKALSKY: Q For a Federally Enforceable State Operating Permit what kind of documentation for emissions control is required?
A
MR. WALSH: Object to form.
THE WITNESS: A Typically, you provide raw material usage and emission calculations.
Q What types of emissions calculations?
A What you're proposing to do.

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Q Would you say controlled emissions?
A In some instances.
Q And uncontrolled emissions?
A And others, potentially.
Q Are you aware of the term potential to emit?
A Yes.
Q Okay, is that a form of emissions?
A The potential to emit? I'm not sure I understand the question.
Q Is that a potential to emit, a facility's potential to emit what does that mean?
A It means, basically, the potential of an emission source to comit pollutants at its maximum capacity and design. Limitations on operating hours or throughput capacity can be incorporated of potential to emit if they're federally enforceable.
Q What does that mean, "federally enforceable"?
A To my understanding it's having limitations on your operations in a permit.
Q And when you say the maximum is that seven days a week, 24 hours a day, 52 weeks a

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year?
A Not necessarily.
Q Can it be?
A It can be, but in many instances it's not.
Q Okay, and what do you have to show -- do you have to show the Illinois EPA something to show that it's not?
A For initial permitting I find that they require you to have that; but subsequent permitting after the determination has been made, typically, I've done permit applications that are not provided potential to emit calculations and just proposed emissions.
Q When you do lifetime operating permit applications do you provide a potential to emit calculation?
A For the initial permitting, yes.
Q Are there any other -- well, with the lifetime it's a lifetime?
A Yeah, unless they decide that they want to add a new piece of equipment and there'd be initial permitting for that piece of equipment.
Q And so you would not need to do a P-T

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calculation for that revision?
A I think a lot of it would depend on -- well, if it's a new piece of equipment or a new emission unit you should -- would provide that; but if it's just something that's not going to involve, you know, changes in raw materials or something, you've already permitted that and -- that unit, so I've worked it both ways where the permit engineers have not requested or required me to submit a potential to emit calculations.
Q So, for an example, if the materials throughput was, that was something that they wanted to revise, that was -- is that an example of something where you might not have to provide the PTE calculations?
A Well, I guess it, in my understanding, it depends on the type of what you're doing. If it's not going to result in additional emissions or if you've already established your potential to emit in the process in previous permitting you may not provide that that time. That's why I try to work with the permit engineers pretty closely in all my permitting processes to make sure I provide them exactly what they need to process

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the permit.
Q And when we, just to clarify, when we talk about potential to emit that's uncontrolled emissions?
A Not always.
Q When is it a situation when it's not uncontrolled?
A Well, if you have a control device that's integral to the operation of the process then the potential to emit can be calculated after control.
Q What determines if a unit is integral, emissions unit is integral to the project?
MR. WALSH: I'm going to object. It calls for a legal conclusion.
THE WITNESS: A Yeah, I'm not -- I think it varies, depending on different circumstances and the use, the type of process, and the type of control device. It's -- every case is different.
MS. TIKALSKY: Q So in a situation like you just described would actual emissions be the same as the potential to emit?
A Which situation are we talking about?
Q Where the emissions unit is integral to

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the process.
A And can you just please rephrase it for me?
Q Well, where -- a situation where the emissions unit is integral to the process.
A You mean the control device is integral to the process?
Q Yes, the control device.
A Yes, it could -- potential to emit can be calculated after control in certain instances where it's integral to the operation of the equipment.
Q So that could be the actual emissions as well?
A Yes.
MR. WALSH: Can we take a short break?
MR. GRANT: Sure.
(WHEREUPON, a short break was held)
MS. TIKALSKY: Q Just to move directly into your, some of the work you've done for NACME, you stated that about mid-2000 is when you began and Mostardi Platt began working with --
THE WITNESS: A Yeah, I'm not sure Mostardi Platt per se -- But me.

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Q Okay, what kinds of services have you provided NACME?
A Sure, spill planning, air permitting, hazardous waste management, all of the reporting, associated reporting activities, determination of whether they're subject to storm water permitting, and so general environmental compliance. We've also got involved somewhat on the safety aspect with regards to personal protective equipment and those kind of activities.
Q Anything else?
A I did work with the initial violation, 2000 violation notice; and that was more in the capacity of responding to requests for information.
Q And that was the Illinois EPA that had requested information?
A Correct.
Q And what was the initial violation?
A If I recall, it had to do with -- there were a couple things that had to do with an alleged emission exceedance and a support facility issue.

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Q The support facility you're referencing that relationship with NACME?
A Yes, I believe that was it.
Q With air do you set up any of the stack tests?
A What do you mean "set up"?
Q Do you organize?
A We have a group within our company that that's what they do, and they pretty much set up the stack testing programs and perform the stack testing.
Q And have they done that for NACME?
A Yes.
Q Do you know what years they've done?
A I know we've done one in 2002, 2006, 2011 for determining emissions rates, how the exhaust stack. We have done diagnostic-type testing to just ensure that the scrubber was operating properly, the emission control device recently, relatively recently, I believe it was 2012.
Q So there's different kinds of stack tests?
A Yes.
Q And the difference between is the

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purpose?
A Correct.
Q Are there different procedures that also go in, fall into place?
A Yes, there are.
Q Were you aware of one in 2013 in April?
A That might be the one I was thinking was, that was 2012.
Q So would you say that was an emissions study?
A It was more of a diagnostic test to make sure the scrubber was operating properly. There's other issues with regards to just emissions, emission of pollutants to the atmosphere. There's also, as I had indicated before, I had Assistant Safety and Health, and there's other concerns that the facility has to deal with and sometimes we want to make sure that the equipment is operating properly in that context.
Q What would be some of those other concerns?
A Employee exposure, employee safety.
Q Do you, when Illinois EPA does, has done

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inspections, have you ever been present?
A Unfortunately, no.
Q And when they -- Sometimes I know when they do stack tests you notify Illinois EPA. Is that something you do?
A It depends, sometimes I do and sometimes I don't. It's conducted by the client, and that's really a call of the client.
Q When they do stack tests are you present at the facility?
A Sometimes I am; sometimes I'm not.
In the instance of NACME, no, I have not been.
Q When you talk about air do you -- have you completed applications for NACME, is that what you said?
A I'm not sure what you mean there.
Q For the air applications, for the air permit applications have you completed them for NACME?
A For construction or operating or --
Q Any kind.
A I've done the FESOP renewal I worked on with Mr. Brodsky. I've done construction permit

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requests for them.
Q Do you remember which construction permit request?
A I know I did an initial one back -- or I shouldn't say an initial -- one in 2000, and I -- for 2005.
Q In the 2000 construction permit was that a joint construction operating permit?
A I don't recall.
Q Were you involved with the 2012 construction permit?
A Yes.
Q When you complete a permit do you, do you do the PTE calculations or --
A In some instances --
MR. WALSH: Object to form.
THE WITNESS: Can you rephrase it, please.
MS. TIKALSKY: Q You were answering it fine.
A Not for all permit applications, no, I do not.
Q Do you, for the 2012 do you remember if you did a PTE calculation?
A I do not recall.

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Q In 2000 when you did the construction permit do you remember doing a PTE calculation?
A At that time I do not believe I did.
Q What about the renewal application in 2005?
A I believe I did at that time.
Q I'm going provide the 2012 construction permit application, particular pages on this -- you want to --
THE COURT REPORTER: Do you want me to mark this?
MS. TIKALSKY: 2, right?
THE COURT REPORTER: Exhibit 2?
MS. TIKALSKY: Yeah. Because Exhibit 1 was the notice of --
THE COURT REPORTER: Okay, because I don't have anything marked.
MR. WALSH: Oh, previously marked exhibit --
MS. TIKALSKY: Oh, previously marked -- I think this should be Number 1 for this deposition.
MR. GRANT: If you want, I'll go print it out, another copy of the --
MS. TIKALSKY: Yeah, would you. Thanks.

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MR. WALSH: I'm sorry, I'm confused now. What are you saying?
MR. GRANT: Well, there's two notices, one for his --
MR. WALSH: Yeah.
MR. GRANT: -- and one for John's.
MR. WALSH: Yeah.
MR. GRANT: And so Number 1 in John's dep was that notice for his deposition -- because the second one for him, that I can just print out, I mean it's --
MR. WALSH: And make it Exhibit 1 you mean?
MR. GRANT: Yeah, right.
MR. WALSH: Yeah, that's fine. I don't care how you do it. I just want the record to be --
MS. TIKALSKY: It's right here if you want a copy of it.
MR. GRANT: Sure.
THE COURT REPORTER: So I'm marking this one 2.
(document marked as requested)
MS. TIKALSKY: Q Okay, I'm showing you what is the pages of the Air Emission Source Construction Permit Application --

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MR. WALSH: Are we calling this Exhibit 2?
THE WITNESS: Yes.
MR. WALSH: Okay, thank you.
MS. TIKALSKY: Q -- February 11th, 2012.
MR. WALSH: Okay, and I'll just state for the record that this is not a complete copy of the 2012 document.
MS. TIKALSKY: Q Do you recognize this document?
THE WITNESS: A Yes.
(Mr. Grant handed a document to reporter)
THE COURT REPORTER: I'll mark this one now 1.
MS. TIKALSKY: Thank you.
(document marked as requested)
MS. TIKALSKY: Q Turn to page, application page 32. Is there -- H-C-L is hydrochloride --
MR. WALSH: I'm sorry, where are you, Nancy?
MS. TIKALSKY: At Section page 32.
MR. WALSH: Page 32. Okay, thank you.
MS. TIKALSKY: Okay.
Q In the left column near the bottom it says "other, specify" and it says "HCL"?
THE WITNESS: A Yes.

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Q What does HCL mean?
A Hydrochloric.
Q Acid?
A Yes.
Q And there's numbers in the columns. Pounds per hour, what does that reflect?
A That reflects the hourly emission rate.
Q Is that actual emission rate?
A In this instance?
Q Yes.
A It's -- yes.
Q Is that of controlled --
A After controlled.
Q -- after it's been through the control?
A After control.
Q Okay, and so -- the number reflected is .0004, is that correct?
A Yes.
Q And then in the second column next to it, there's number .44 tons per year?
A Yes.
Q And that also reflects the actual emission rate after control?
A Not necessarily. That's a de minimis

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level, the .44.
Q Okay, can you explain that?
A Typically, emissions less than that level the agency doesn't really get down to those -- below those levels. So in a lot of the air permits that I review that have been issued they, basically, put it at that limit when they're listing limitations in permits.
Q So this is limits you anticipate in your permit?
A Yes.
Q And then I'd like you to turn to page, application page 35. It has very tiny writing. At the top it says "Exhibit 260-1, HCL Pickling Line Emission Calculations". Do you see that?
A Yes.
Q And then there's like an open bar that says, "operating conditions, process data"?
A Yes.
Q Do you see that? And then below that there's another open bar, it says "potential to emit"?
A Yes.
Q Okay, what does that mean in particular

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for this document?
A That means potential emissions prior to control.
Q It says -- Can you explain just below that what the -- that's the formula or calculations that you're using?
A Yes, it is, basically, taking -- using the 2006 stack test results of the .0004 pounds an hour, that is converted into pounds of HCL emissions for ton of steel throughput, and that's divided by the control efficiency or anticipated control efficiency of the oxidite or the scrubber, and then you multiply that by the maximum number of tons of steel that can be through -- put through the process.
Q And what is your control efficiency?
A I'm sorry?
Q What is the control efficiency -- you said the .99 --
A It's assumed to be --
Q -- one minus --
A Yeah -- assumed to be 99% control. It's not measured during the stack test.
Q Okay, do you see that there's a paren one

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minus --
A Yes.
Q -- 0.99?
A Yes.
Q Is that a mathematical --
A Well, no, it's basically you're just divide -- yeah, it's a mathematical equation. You're just, basically -- one represents 100% control.
Q Right.
A You're subtracting the 99% control; and you're, basically, using that remainder to calculate the potential emissions based upon the emission rate.
Q So potential to emit after control?
A No, that's before control.
Q Well, if your control efficiency is 99%, you go 100% minus 99% point 0 --
A No, you're dividing by 0.1. You're not multiplying it.
Q But isn't 0.1 the controlled emissions rate?
A Yes, that's why you're dividing it to back-calculate the uncontrolled emissions rate.

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If I was going to calculate the controlled emissions rate I would multiply it.
Q Okay, thank you.
Maybe you can keep them near him in case he needs to use them again.
This is to be marked Exhibit 3.
(document marked as requested)
MS. TIKALSKY: Q What I've handed you is dated March 30th, 2005, Application for Renewal of Federally Enforceable State Operating Permit. Do you recognize this document?
THE WITNESS: A Yes.
MR. WALSH: Again, I'll note for the record it's not a complete document.
MS. TIKALSKY: Q It says "renewal" for the Federally Enforceable State Operating Permit. Was your current permit a federal re-enforceable state operating permit?
MR. WALSH: Object to form.
THE WITNESS: A It had limitations, restricted emissions from the site.
Q Do lifetime operating permits have restrictions on emissions?
MR. WALSH: Same objection.

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THE WITNESS: A Not all the time.
MS. TIKALSKY: Q Can they?
A In some instances.
MS. TIKALSKY: I'd like to mark this Exhibit Number 4.
(document marked as requested)
MS. TIKALSKY: Q I'm showing you what is called Operating Permit - Revised, issued February 8th, 2001. Do you recognize this document?
THE WITNESS: A Yes.
Q Can you tell me what kind -- what this document is?
A It's a permit, an air permit.
Q For who?
A NACME Steel Processing it says.
Q Okay. And do you note the expiration date?
A Yes.
Q What does it say?
A October 25th, 2005.
Q Okay. And does this document have emission limitations?
A Yes.

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Q Is this the Title Five document?
MR. WALSH: I'm going to object. The document speaks for itself.
THE WITNESS: A I don't know.
MS. TIKALSKY: Q When you look at it does it appear to be a Title Five document?
MR. WALSH: Object to form.
THE WITNESS: A With limitations on it, yes, it appears to be a type of permit that would be issued as a FESOP.
MS. TIKALSKY: Q I'll have you turn to page -- it says way at the lower right corner "NMLP 1251". At the stop it says "Standard Conditions for Operating Permit".
A Yes.
Q Is it possible that this is a state operating permit?
MR. WALSH: Object to form.
THE WITNESS: A I'm not sure what -- I understand what the question is. Is it an air permit, yes. Is it an operating permit, yes.
MS. TIKALSKY: Q An operating permit for air emissions, correct?
A Correct.

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Q Earlier you explained that there are different kinds of operating permits, there's lifetime operating permits. Is this a lifetime operating permit?
A It does not look like one.
Q And then operating permits, which this one has an expiration date?
A It's consistent with both different types of permits I've seen, such as a FESOP or an operating permit. I can't really say which one. It could be either.
Q Did you review this document when you did the renewal for the --
A I don't recall.
Q -- FESOP --
And item number two on this document, the operation and hydrogen chloride HDL emissions from the pickling line shall not exceed the following limits, it has steel throughput, emission factor, and HCL emission. Do you see that?
A Yes.
Q Could you state what the HCL emissions factor is?

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MR. WALSH: Object to form.
THE WITNESS: A What do you mean state what it is?
MS. TIKALSKY: Q Could you read it?
A It says the emission factor is 4.8 pounds per thousand tons.
Q And then the HCL emission, the third column, tons per year?
A 1.4.
Q And is that after control?
A It would have to be.
MS. TIKALSKY: Okay, I'm marking Exhibit 5.
(document marked as requested)
MS. TIKALSKY: Q I'm showing you what is titled the Air Emissions Source Operating Permit Revision Application dated April 11th, 2002. Do you recognize this document?
THE WITNESS: A I'm not finished reviewing it.
Yes.
Q We'll make a qualification. I'm not sure if it's the entire document or not. It's a good share of it. And I would like you to turn to what is page four, it states on the bottom

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at -- you see the item numbers are numbered -- number 12?
A Um-hum.
Q Would you look at number 12.
A Yes.
Q Is that what's used for this application in determining the maximum operating time of emission source?
MR. WALSH: I'm going to object. The document speaks for itself. You're mischaracterizing the question.
THE WITNESS: A It appears so, based upon the calculation.
MS. TIKALSKY: Q Okay. And it's based on 24 hours a day, seven days a week, 52 weeks a year, is that correct?
A Yes.
Q On page 11, under the number 11 where it says "efficiency of scrubber" --
A Yes.
Q -- is gaseous -- what would be the HCL factor?
A That would be particulate.
Q What would the gaseous be for?

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A That could be just -- you've got moisture and other types of air flow.
Q And it states 99.90%?
A That's what it states.
Q And then if you would turn to what is IEPA FOIA 0385 page at the bottom on the right side of the page, It says the emission calculation.
A Yes.
Q It says "4.8 pounds of HCL per ton steel processed". What does that mean?
A Basically, to me looking at it it looks like a typo. Should be for per thousand tons processed. If you look above, the permit emission factor, meaning that 4.8 pounds of HCL are emitted per -- it should be thousand tons of steel processed.
Q Okay. Wait, it also says "current permitting emission factor, scrubber control".
A Yes. What about it?
Q It says .0048 pounds HCL per thousand tons steel processed?
A Yes.
Q Does that comport with the current

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permitted emission factor, no control?
A Are you talking about the February 2001 operating permit; is that what we just looked at?
Q I was just trying to understand these numbers --
A Sure --
Q -- 4.8 pounds HCL per ton of steel processed.
A That is the factor on this February 2001 permit you showed me. It does not indicate whether this factor is before or after control.
Q Right. And on this calculation sheet there is, parenthesis, it says, "(no control)" and in parenthesis it says "(scrubber control)"?
A Correct.
Q Could you explain what each of those mean?
A Sure. The -- after -- no control, that emission factor, it appears that basically is taking that 4.8 pounds -- again, it looks like a typo to me -- a thousand tons of steel processed, okay, and saying that's uncontrolled emission rate. You would take a factor of 99% control over that, it's going to reduce emissions to the

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.0048.
Q On that last line it says HCL pounds per hour --
A Yes.
Q -- 3600 pounds per year. Where does the "3600" come from?
A That comes from multiplying the emission factor by 750,000 tons of steel.
Q And the results is .41 pounds of HCL per hour?
A Yes, based upon 8,760 hours year of operation.
Q And how does that calculate in tons per year?
A Well, basically, you can just turn it around, the 3,600 pounds a year. So if I were to take .41 pounds and multiply it by 8,760 that would equal 3,600 pounds.
Q So how would you figure out the maximum potential to emit?
MR. WALSH: Object to form.
THE WITNESS: A Maximum?
Q How would you calculate the PTE?
A I would take the hourly emission rate and

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provide a conservative value, I'd multiply it by the 8,760 because, typically, machines can't operate 24 hours a day, seven days a week, and it would provide a conservative estimate.

Q And to get the tons per year?

A I would just divide that number by 2000.

Q But that .41 pounds of HCL per year, per hour is controlled, correct?

A Is it? Based upon this calculation the way it works out it's based upon the 4.8 pounds HCL per ton of steel processed. That's the permitted factor here, and that doesn't say whether it's controlled or not. It's just based upon the permitted factor.

Q And where does the factor come from?

A I'm not sure. That was permitted before I believe I got involved in the permitting process.

Q Um-hum.

A So it would have been established by the Illinois EPA in the permit.

Q Is it based on an application request?

A I don't know. That was -- This is the, you know, this is the permit -- I think there

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was -- I don't know if there was or how that process or where that emission factor became established. That was before I was involved in the project or with NACME.

MS. TIKALSKY: I'd like to mark this Exhibit 6.

(document marked as requested)

MS. TIKALSKY: Counsel.

Q Do you recognize this document?

THE WITNESS: A Yes.

Q How do you recognize this document?

A I'm not sure what -- How do I recognize it? I've seen it before.

Q Okay. I'll qualify this is the Gaseous Emissions Test performed for NACME Steel Processing, LLC, dated April 16th, 2002. I'd like you to turn to what is the bottom right-hand corner "NMLP 0243". In a little chart under Summary of Results --

A Yes.

Q -- the second item, it says "HCL emission rate, pounds per hour, 0.217"?

A Yes.

Q Is that control emissions?

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A I'd like to see the rest of the stack test report.

Q Well, in the top -- at the top of the column it says "HCL Scrubber Exhaust Stack". Does that help?

A That would be after the exhaust stack, so that would be after control.

Q Okay.

A If the scrubber was operating at the time. There are times when you do stack testing where the control device may not be in operation.

Q Um-hum.

A Do you have the rest of the report?

Q I don't think I have that.

Do you recall with the 2005 application if it was based on this stack test?

A No, I don't recall.

MS. TIKALSKY: Exhibit 7.

(document marked)

MS. TIKALSKY: Q I'll have you look at -- this is just to say Renewal Application, Federally Enforceable State Operating Permit, dated October 18th, 2005; and the third last page is numbered "NMLP 0291" on the bottom right.

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MR. WALSH: I'm sorry, what page did you say?

MS. TIKALSKY: NMLP 291.

MR. WALSH: Okay, I thought you said very last page.

MS. TIKALSKY: Third one.

MR. WALSH: Okay, thanks.

MS. TIKALSKY: Q In the left column near the bottom it says, "other, specified HCL"; do you see that.

THE WITNESS: A Yes, ma'am.

Q And then it says "maximum"?

A Yes.

Q And that's in the pounds per hour column, it says "4.34"?

A Yes.

Q What does that represent?

A It appears to be the hourly emission rate of HCL.

Q Okay, and at the top of that second column it has an uncontrolled emission rate box --

A Yes.

Q -- with an X in it? And a super one there that says, "check uncontrolled emission

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rate box if control equipment is used"?
A Yes, I see it.
Q Okay, so this is what the emission rate is when the controlled equipment is in place?
A I don't think necessarily, no.
Q Why not?
A Because I'm not sure exactly what that rate is based on.
Q So they may have checked the wrong box?
A I don't know that.
Q From the document here what would, if you were reading this document, how would you understand it?
MR. WALSH: Object, calls for speculation.
THE WITNESS: A Well, I guess there's two ways I could look at this. I looked at the emission factor over on the right at .0065 or the pounds per hour; and there I don't know if -- whether they've assumed 24-hour operation or they put there's limitations on operations. As I discussed earlier, you cannot operate a piece of equipment 24 hours a day, seven days a week, typically. There's maintenance activities and other things or 365 days a year that you have to

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perform on that.
Q So at the top -- you were looking at the far right column where it says ".0065" pounds per HCL per ton of steel?
A Yes.
Q Does that mean that the rate for the steel throughput, the amount of steel throughput?
A It could be. You know, I don't see any other data.
Q And the next column over it says ".951" tons per year under the permitted emission rate?
A Yes, I see it.
Q Is that the tons per year emission rate of HCL after control?
A Well, I see permitted emission rate. It doesn't say --
Q Okay.
A It just says as a -- "provide the emission rate that will be used as a permit special condition".
Q So if the 4.34 were -- the pounds per hour of emissions, if the control equipment was used -- and next to it it says "19" tons per year?

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A That's what the document says.
Q All right.
And you were involved in the creation of this document?
A I believe a project engineer at Mostardi Platt was named, like Karyn Andersen.
Q So what were you involved with with this renewal application?
A I'm -- I was involved with corresponding, or I should say discussing the process with Valeriy Brodsky, the permit engineer, and responding to his requests for information. And, also, discussing the permit, this permitting, the process.
Q Um-hum. Are you aware of what the potential to emit at the time of this application was for the facility?
A No, not specifically what it was. I think I would have based it upon what we were permitted for.
MR. WALSH: Nancy, can we take a short break?
MS. TIKALSKY: Sure.
(WHEREUPON, a break was held)
MS. TIKALSKY: Number 8.

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(document marked as requested)
MS. TIKALSKY: Q Do you recognize this document at all?
THE WITNESS: A Yes.
Q This is a document, a fax with pages attached, faxed cover sheet with pages attached, to the Illinois EPA, attention: Val Brodsky, B-R-O-D-S-K-Y, from it's Blythe Cozza. Do you know Blythe Cozza?
A No.
Q It's NACME Steel Processing, LLC, regarding -- it says, the Following is from the stack test the 5-97, conducted by Macro Beck, (phonetic).
And I'll have you turn to the last page, NMLP 0008, in the bottom right corner, "Field Data and Results Page, Scrubber Inlet". What does that mean?
A Based upon what it says I would guess that it's the stack going into the scrubber.
Q Is that uncontrolled emissions?
A I would guess so, if it's before the scrubber it would be uncontrolled emissions.
Q Okay. And in the, about the middle of

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the page, at Roman numeral number two, Results --
A **Um-hum.**
Q -- you have the HCL pounds per hour line --
A **Yes.**
Q -- do you see that? And in the far right column it says "average"?
A **Yes.**
Q It says "21.41"?
A **Yep.**
Q So what -- 21.41 pounds per hour, what would the tons per year of the HCL be?
A **Well, if you -- I don't have a calculator to do the math -- but if you multiply it by the 8760 or the maximum operating hours that source can operate, you would have to know what the maximum source operating hours are to calculate potential to emit for that.**
Q And that would be per hour and then just divide it by 2000 to get tons per year --
A **Yes --**
Q -- pounds per year?
A **That's what's also been called is -- you don't have a lot of the supporting data to make**

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sure that the stack testing -- because this is what this stuff is -- was done according to EPA procedures. There should be a lot of backup data that would, calibration records and a lot of that that you'd have to -- you know, typically you would see with this to make sure it was measured correctly in accordance with EPA methods.
MS. TIKALSKY: Okay, mark this as Exhibit 9.
(document marked as requested)
MS. TIKALSKY: Q I represent that this is the partial pages of the Hydrogen Chloride Emission Compliance Test Report dated April 1, 2011. Do you recognize the document?
THE WITNESS: A Yes.
Q I'll have you turn to page NMLP 0075. It states this is the Test Result Summaries, is that correct --
A **Correct.**
Q -- at the top?
And the second bar it says, Hydrogen Chloride Emissions, do you see that?
A **Correct.**
Q And the last column, "average under pounds per hour", do you see that?

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A **Yes.**
Q It says .012?
A **"0.012".**
Q Yes. Is that an emissions rate summary after control?
A **Yes, based upon the exhaust stack, scrubber exhaust that would be after control.**
Q And, again, to calculate the potential to emit based on the, what, 99.9% control?
A **Well, you don't know that that scrubber's operating at that control efficiency. So, again, to get an accurate PTE you'd have to know the scrubber control efficiency at the time of the stack test.**
Q Right. And that's not in any of this data here, the summary?
A **I do not see it.**
Q But the calculation to get the PTE would be times that 8760 maximum?
A **Assuming that that was the maximum operating hours of the equipment.**
Q Divided by 2000, you'd get tons per hour?
A **That would be tons per year.**
Q Tons per year.

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And then that would be the emission rate -- controlled emission rate, right?
A **Annual?**
Q Tons per year, yeah.
A **That sounds right. I'm not doing the math, so I -- If you took that and you assumed that it could operate, 760, you would multiply that by that rate and divide by 2000 would give you tons per year.**
Q And if I wanted to then calculate what the uncontrolled emissions were I would --
A **You'd need to find out what the scrubber control efficiency was at the time of the test.**
Q Right. And then I would divide that by the control efficiency?
A **Well, one minus the control efficiency, right, like we discussed earlier.**
Q Right.
I would like you to turn to page 10 of the document at the bottom there. There's some notes there in the lower right corner.
A **Yes.**
Q They're calculations?
A **Could be. It could just be some -- a lot**

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of times when you do calculations you're kind of running through different numbers and different stuff. I would have to -- Some of it's cut off. So it's hard to tell. Those could be notes after the fact. You don't know when they were made.

Q The -- It looks like it's an e-mail document from R. Linden. Who's "R. Linden"?

A Rosanne Linden. She's a project manager at Mostardi Platt. She would have been involved in track -- probably getting the process data to be recorded during the stack test, see the tonnage of throughput, and requesting the information.

Q You don't know whose handwriting this would be?

A This writing on the bottom is mine.

Q It is yours?

A Yes, right here.

Q And you don't recall what that was about?

A Like I said, a lot of times what I do is I try and do different numbers and come through and see what, the calculated hourly emission rate potentially for purposes of the application, like we did in the previous one where we came up with

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the .41 pounds an hour, you know, you've got to have some information that you would put in some of the application forms, so you -- it could just be some hand scratch and doing different values and numbers.

Q So the .012 appears to be, 0.012 appears to be pounds per hour of HCL emissions from the stack test and then divided by 0.01 equals 1.2, that may be the one minus 99 --

A Yes, that could be.

Q -- .9?

A Assuming, again, it's an assumption that it's 99% control.

Q Um-hum. Okay.

What time is it?

MR. GRANT: About seven minutes to 4:00.

(Mr. Tikalsky handed reporter a document)

(document marked)

MS. TIKALSKY: Okay?

THE COURT REPORTER: Um-hum.

MS. TIKALSKY: Q This is a group of documents from 2002. Do you recognize these documents?

THE WITNESS: A Yes.

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Q And the top page is "NMLP 0233" in the bottom right corner, the permit denial, dated May 16th, 2002, is that correct --

A Yes.

Q -- do you see that? Can you read the first paragraph where it says "the Illinois EPA".

A It says "We read 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 Illinois Administrative Code, Section 201.160 might be violated."

Q And then the next paragraph where it says "the Illinois EPA", if you read the first sentence.

A "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."

Q And in just summarizing "the condition above", is that emissions test to be performed by an approved testing service?

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MR. WALSH: I'm going to object. The document speaks for itself.

MS. TIKALSKY: Q This permit included a condition that the emission test be performed by an approved testing service, do you that in number one, the second sentence?

A Yes.

Q And then I'd like you to turn to what is document NMLP 0237 and 0238. In relation to the permit denial, this is dated May 28, 2002 letter to the Illinois EPA from NACME, Thomas Beach, vice-president, plant manager, do you recognize this letter?

A Yes.

Q Did you help write it or compose it?

A Yes.

Q And what was the purpose of this letter?

A It was to submit the stack test report to the Illinois EPA, also request incorporation of the data into an operating permit, and then also it helped to notify them that the pickling baths were going to be operated at the lower HCL concentration than originally anticipated due to a lack of business.

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Q Did an application accompany this with compliance --
A The test report, this was a -- it's my recollection that this covered a previous application, and it was a submittal of the test report for that application.
Q Is that for the application that we just read, the permit denial on NMLP 223?
A I am not sure. I don't recall exactly. There's been a couple different construction permits issued at various times.
Q Is this a denial of an operating permit or a construction permit?
A It says operating permit.
Q And this letter is a request --
A To request a submittal of the stack report and request that the information be incorporated into -- or actually it says, you know, "We are requesting the process modification be incorporated into the existing permit." So the existing permit could be the operating permit they were currently operating under.
Q But a letter like this without an application wouldn't be regarded as an

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application?
MR. WALSH: Object to form.
THE WITNESS: A That letter would have been submitted with the test report.
MS. TIKALSKY: Q Right.
A Right. But as part of the -- it could be I -- in my opinion, it could be considered part of the application because you're required to submit that as part of the application to demonstrate what you're doing.
Q Okay, when -- and going back to the permit denial, is this a dead application?
MR. WALSH: Object to form.
THE WITNESS: A What do you mean by "dead application"?
MS. TIKALSKY: Q Well, is it no longer a live application waiting for information to be submitted?
A I don't know. I think you have to ask the Illinois EPA that.
Q Well, in that second paragraph it says, "The Illinois EPA would be pleased to review a re-application for this permit". Do you see that?

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A Yes, I see that.
Q And what does that mean to you?
A Well, if we want to send in another application they'll review it.
Q Right.
A That's different than a permit being dead.
Q But they would expect another application?
A I don't know if they would expect one. They said they would review one if it's submitted.
Q And then looking at the pages 0234, 0235 and 0236, this is a Construction Permit - Revised on the first page, 0234, issued April 12th, 2002. "Permit is hereby granted to the above-designated permittee to construct emission unit and/or air pollution control equipment consisting of turbo-tunnel enclosure on the existing steel pickling line and increasing a steel processing rate as described in the above-referenced application. This permit is subject to the standard conditions attached hereto and the following special conditions". And then it goes

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1, 2, 3A, B, C, D, 4A, B, C, D, E, 5.
And number two it says, "This permit allows operation of the pickling line at the rates and operational parameters specified in condition one only for the purpose of stack testing required for Special Conditions 3." Is there anything in this construction permit that allows operating --
MR. WALSH: I'm going to object to form.
MS. TIKALSKY: Q -- under this permit?
MR. WALSH: The document speaks for itself.
THE WITNESS: A Can you rephrase the question?
MS. TIKALSKY: Q Is there anything in this -- these three pages that states it is an operating permit?
MR. WALSH: Same objection.
THE WITNESS: A Well, it says in condition two that the permit allows operation of the pickling line at the rates and operational parameters specified in condition one for the purpose of stack testing.
Q Only for the purpose of stack testing, correct?

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A Yes.
Q So would you regard this as an operating permit?
A No.
Q Okay.
(Counsel handed reporter a document)
(document marked)
MS. TIKALSKY: We're getting there.
MR. WALSH: I'm sorry, is he looking at the exhibit now? Because I don't have one.
MS. TIKALSKY: Oh, here.
MR. WALSH: Thanks.
MS. TIKALSKY: Q Okay, I'm representing that this is a letter to Valeriy Brodsky dated March 23rd, 2007, from NACME Steel, John DuBrock. You work with John DuBrock?
THE WITNESS: A Yes, I work with him.
Q Right. It's regarding Change Request for a FESOP application. And did you compose this letter for him?
A I don't recall.
Q Can you summarize what this requested, specifically asking?
A Sure. Basically, it appears to request

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an increase in throughputs for the pickling process.
Q And earlier you stated that would be a change in operation, an increase of throughput, material throughput, is that correct?
A Yes, if it was done. This is just proposed.
MS. TIKALSKY: Okay, you want to chat?
MR. GRANT: You want to call Maureen?
MS. TIKALSKY: Um-hum.
MR. GRANT: And see if she's got anything?
MS. TIKALSKY: Um-hum.
MR. WALSH: We can just step out.
MR. GRANT: Do you mind?
MR. WALSH: No.
MS. TIKALSKY: Off the record.
(WHEREUPON, a short break was held)
MS. TIKALSKY: Q A couple more questions on the document Exhibit Number 4, the operating permit revised, which is issued February 8th, 2001. Have you got it? Okay, could you look through this document and tell me if there's any place on this document where it says it's a Federally Enforceable State Operating Permit.

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THE WITNESS: A I don't see anywhere it says that. I see limitations on the permit.
Q And you did state earlier that some state operating permits may have limitations?
A Yeah, any of them can.
Q And then to Exhibit Number 10 where the top page says "Permit Denial", is that the letter or --
A The construction permit revised?
Q 0237, NMLP 0237, that page, okay -- and 0238. On this document do you see anyplace where this letter was sent to the permit section of the Illinois EPA?
A It doesn't list permit section on here.
Q And it's addressed to the Compliance and Enforcement Section, is that correct?
A Yes. If I recall, I was working with Julie Armitage due to a facility closure.
Q Yeah. And a couple of quick questions, standard: Do you have a criminal record?
A No.
Q Do you -- Ever been sued before?
A No.
Q Sued anyone else?

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A Nope.
Q Are there any answers to my questions that you wish to change?
MR. WALSH: I'm going to object to the question until he reviews his deposition and has a right to make such changes.
MS. TIKALSKY: Not substantive. And that's what I'm asking.
THE WITNESS: A Not that I can think of at this moment.
MS. TIKALSKY: Q Do you have any other information that I asked you about that you now recall that you did not earlier?
MR. WALSH: I'll object. We've been sitting here now three hours and you're asking him now to recall everything he's testified about.
THE WITNESS: A Not that I'm aware of at this time.
MS. TIKALSKY: Thank you, that's all I have. Do you have anything?
MR. WALSH: No, I don't. Thank you. We'll reserve.
MS. TIKALSKY: Okay.

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STATE OF ILLINOIS)
) ss:
COUNTY OF COOK)

The within and foregoing deposition of the aforementioned witness was taken before NANCY K. SPEARE, C.S.R, and Notary Public, at the place, date and time aforementioned.

There were present during the taking of the deposition the previously named counsel. The said witness was first duly sworn and was then examined upon oral interrogatories; the questions and answers were taken down in shorthand by the undersigned, acting as stenographer and Notary Public; and the within and foregoing is a true, accurate and complete record of all of the questions asked of and answers made by the aforementioned witness, at the time and place hereinabove referred to.

The signature of the witness was not waived, and the deposition was submitted, pursuant to Rules 207 and 211 (d) of the Rules of the Supreme Court of Illinois, to the deponent per copy of the attached letter.

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The undersigned is not interested in the within case, nor of kin or counsel to any of the parties.

Witness my official signature and seal as Notary Public in and for Cook County, Illinois on this day of , A.D. 2013.

NANCY K. SPEARE, C.S.R.,
Notary Public
License No. 084-001584

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TOOMEY REPORTING
205 West Randolph Street
Suite 1230
Chicago, Illinois 60602

WITNESS CERTIFICATION

I hereby certify that I have read the foregoing transcript of my deposition consisting of pages 1 through 84 inclusive. Subject to the changes set forth on the preceding pages, the foregoing is a true and correct transcript of my deposition taken on 10-17-13.

(Signed)
BRITT E. WENZEL

SUBSCRIBED AND SWORN TO
Before me this day of

A.D. 2013.

Notary Public

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ATTACHMENT B

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 E

VALERIY BRODSKY 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, Valeriy Brodsky, 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 facts as set forth herein as follows:

1. I am currently employed by the Illinois Environmental Protection Agency ("Illinois EPA" or "Agency") as an Environmental Protection Engineer III, Bureau of Air, Permit Section, located at 1021 North Grand Avenue East, Springfield, Illinois. I have held this position from 1994 to the present. I was and continue to be the permit reviewer for Nacme Steel Processing, LLC

2. As an Environmental Protection Engineer III, my duties and responsibilities include, in part, review and recommend action on air permit applications, drafting correspondence and permits related to permit applications and ensure such activities are performed in compliance with the federal Clean Air Act, the Illinois Environmental Protection Act ("Act") and Pollution Control Board ("Board") regulations.

3. The April 2002 Stack Test shows the tons per hour (tph) of steel throughput that occurred during the stack test is based on 200 tons of steel pickled in a 6 hour period resulting in a calculation of 33.3 tph of steel throughput (process rate).

4. The April 2002 Stack Test results indicate the average HCL emission rate during the stack test to be .217 lbs/hr controlled emission rate. I calculated the PTE HCL (before control) on the maximum hourly controlled emission rate and the efficiency of the control at 99.90% efficiency stated in the 2002 Construction Permit and 2005 FESOP Application as the manufacturer's guaranteed efficiency result, which means that less than 1% of uncontrolled emissions are emitted. Thus, the measured or assumed negligible controlled emission shall be multiplied at least by 100 to get the uncontrolled emission rate value also known as PTE.

5. The emissions factor derived from the April 2002 Stack Test shows the HCL emissions factor to be 6.51 lbs. of HCl per 1,000 (10^3) tons of steel throughput. The emissions factor is calculated as follows: 0.217 lbs HCL per hour controlled emission rate divided by 33.3333 tons of steel/hour equals .0065 lbs HCl/Ton of Steel.

6. In Nacme's September 2005 SOP Renewal Application Nacme calculated the HCL PTE controlled emission rate to be 1.8 tpy of HCL emissions based on Nacme's 2005 SOP allowances of 4.8 lb/1000 tons and a 750,000 tpy proposed process rate, instead of the controlled emission rate and actual steel throughput shown in its April 2002 Stack Test results, which was the most recent indication of HCL emissions at the Facility.

7. In December 2005, I informed Nacme that the Agency could issue a FESOP with a process rate no greater than 33.3 tons per hour ("tph") pursuant to the results shown in its April 2002 Stack Test but not at the process rate of 85.6 tph proposed in Nacme's 2005 FESOP Application.

8. On several occasions between December 2005 and January 26, 2012, when Nacme met with the Complainant in a prefiling meeting, the Agency requested Nacme to submit a construction permit application for Nacme's proposed annual maximum steel throughput process modification requested in its 2005 FESOP Application and 2007 FESOP Application.

9. On or about February 12, 2012, Nacme submitted a construction permit application requesting the process modification of 120 tph, which was equivalent to Process Modification requested in its 2007 FESOP Application.

10. Relevant calculations for the Facility permits, permit applications and stack tests include the following:

Steel throughput process rates:

Nacme's 2005 SOP: 600,000 tpy divided by (24 x 365) = 69 tph

April 2002 Stack Test: 33.3 tph process rate x (24 x 365) = 292,000 tpy

Nacme's 2002 Construction Permit and 2005 FESOP Application:
750,000 tpy process rate divided by (24x365) = 85.6 tph process rate.

PTE HCL air emissions before control at the Facility:

0.217 lbs/hr air emissions after control x 100 = 21.70 lbs/hr x (24 x 365)
= 190,092 lbs/yr divided by 2000 lbs/ton
= 95.046 tpy of PTE HCL air emissions before control.

FURTHER, AFFIANT SAYETH NOT.

Valeriy Brodsky
VALERIY BRODSKY

SUBSCRIBED and SWORN to
Before me this 14th 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. NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation, Respondent.	)	**PCB No. 13 - 12** (Enforcement – Air)

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.

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

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. NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation, Respondent.	)	**PCB No. 13 - 12** (Enforcement – Air)

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
Applicant's Designation: PICKLING
Subject: Steel Pickling Plant
Date Issued: February 8, 2001
Location: 429 West 127th Street, Chicago, 60628

I.D. No.: 031600FWL
Date Received: November 13, 2000

Expiration Date: October 25, 2005

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.

Directory
Environmental Protection Agency
Bureau of Air

September 1, 1992

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

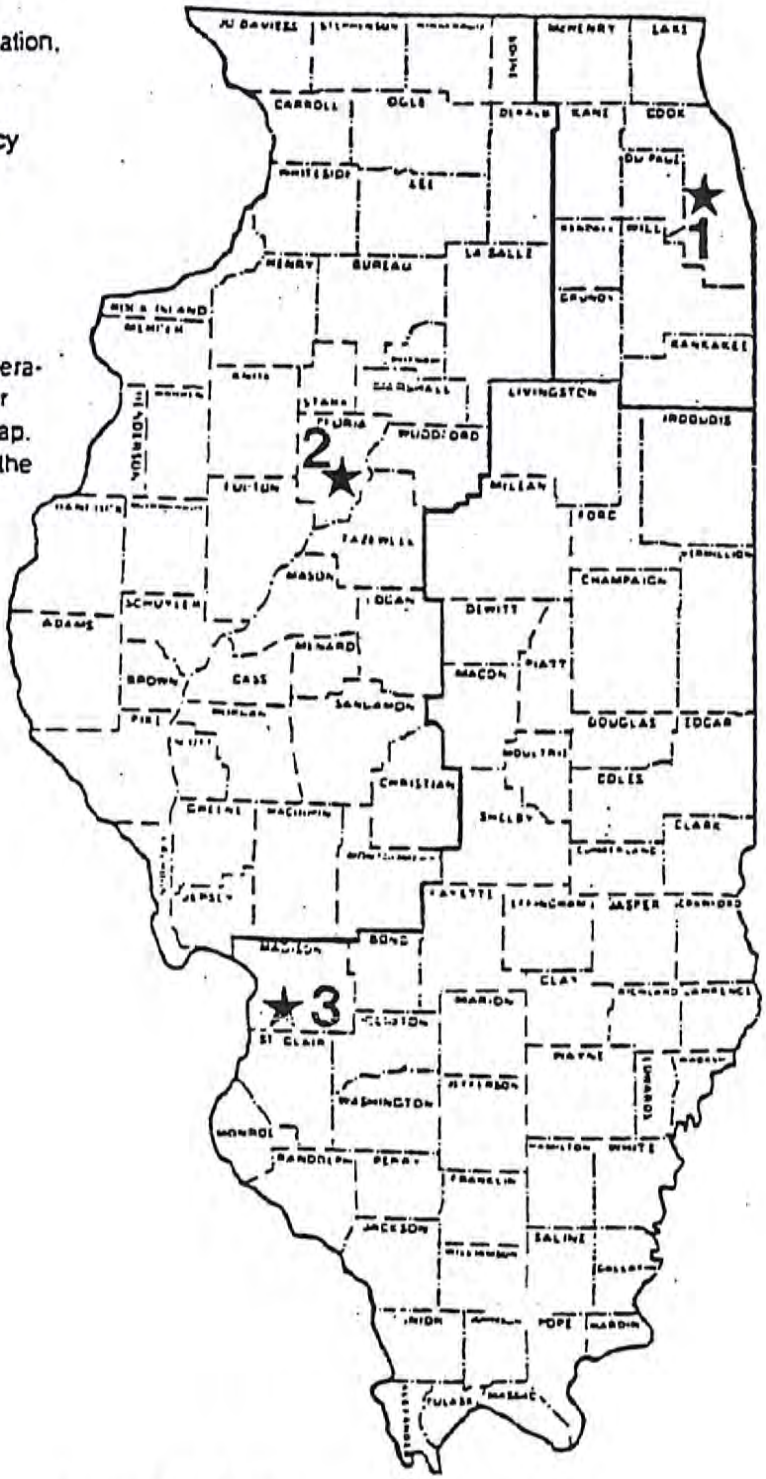
Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
2200 Churchill Road
Springfield, Illinois 62706
217/782-2113

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

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.

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	FOR AGENCY USE ONLY
NAME OF EQUIPMENT TO BE CONSTRUCTED OR OPERATED (B) **HCL Steel Pickling Line, HCL-ASTs**	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 — BY ______
SIGNATURE — DATE — SIGNATURE

Thomas Beach
TYPED OR PRINTED NAME OF SIGNER — TYPED OR PRINTED NAME OF SIGNER

Vice President, and General 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 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:
428 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.	*Descaled 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. *6,800*	LB/HR		c. *6,800*	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 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:

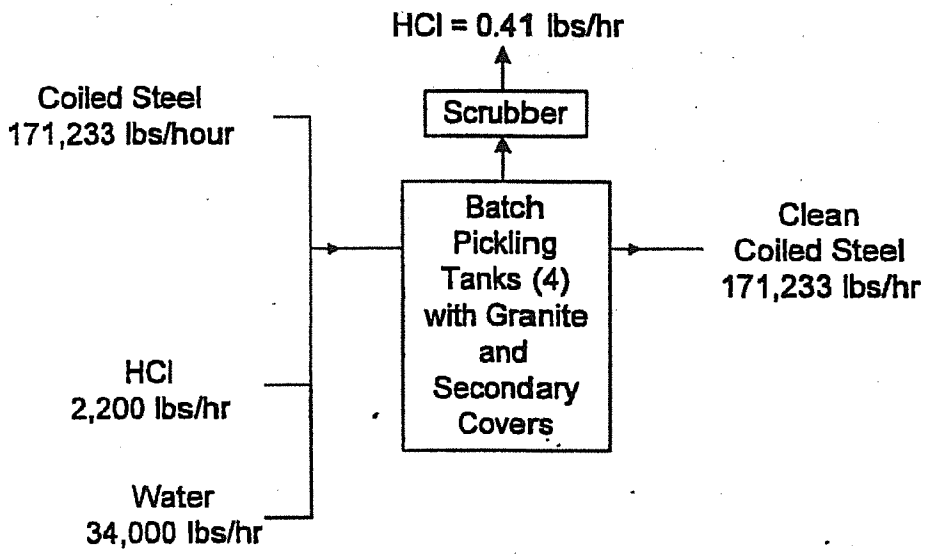
AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
6. FLOW RATES: _____ GPM _____ SCFM	8. FLOW RATES: _____ GPM _____ SCFM
7. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): %	9. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): %

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.	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

cc: Lanny
B/H Wentz
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.

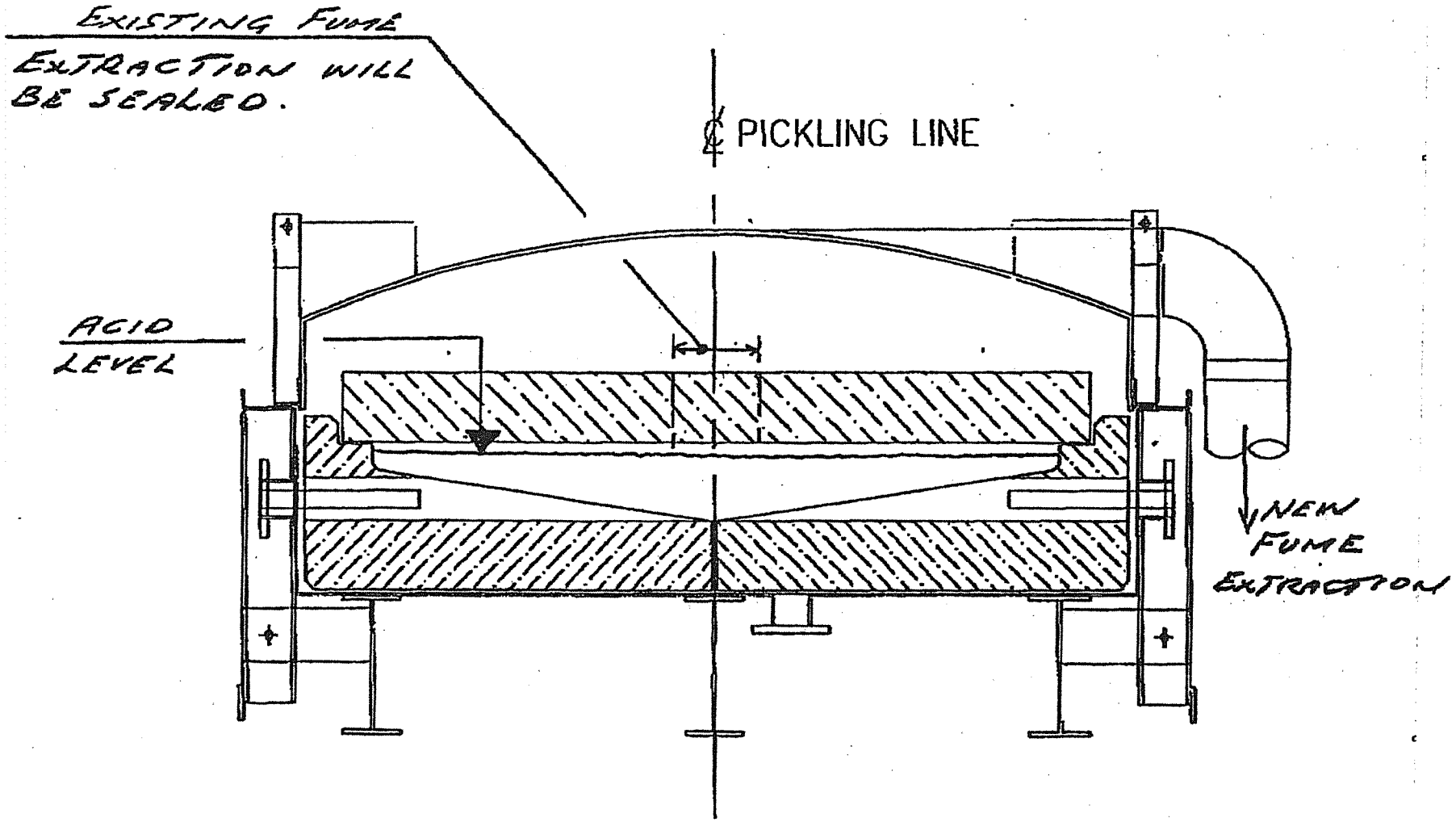
Best regards,

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. NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation, Respondent.	)	**PCB No. 13 - 12** (Enforcement – Air)

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)	Steel Throughput (Tons/Yr)	Emission Factor (Lb/10^3 Ton)	HCl Emission (Lb/Mo)	HCl Emission (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.	)	**PCB No. 13 - 12**
	)	(Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,	)	
	)	
Respondent.	)	

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 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

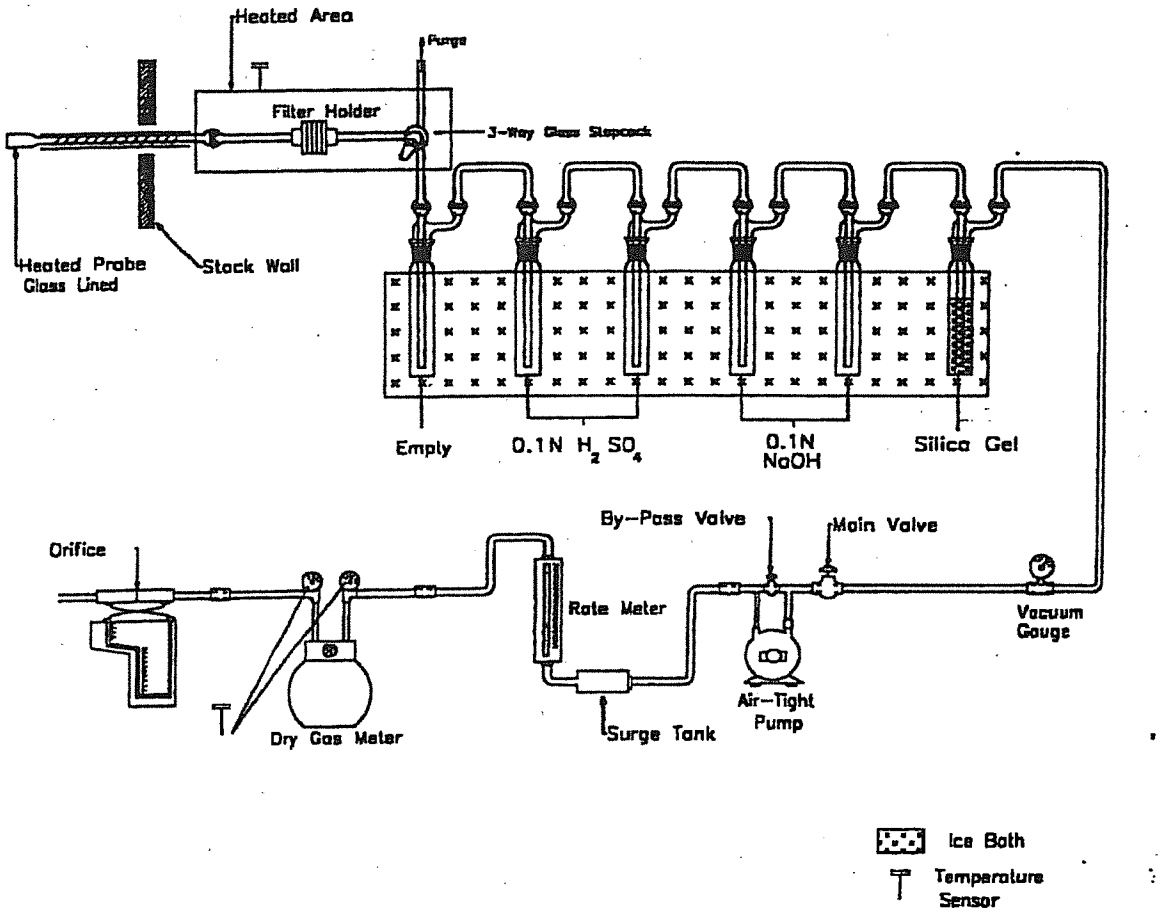
	Temp	% Acid	Scrubber Water	Stack MSA Monitor
8AM	#1 195° #2 185° #3 195° #4 195°	11.5%	2.57 GPM	7 PPM
9AM	#1 195° #2 185° #3 195° #4 195°	11.6%	2.67 GPM	12 PPM
10AM	#1 195° #2 185° #3 195° #4 195°	11.6%	2.69 GPM	8 PPM
11AM	#1 195° #2 185° #3 195° #4 196°	11.4%	2.58 GPM	9 PPM
12:00	#1 195° #2 185° #3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

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)	749.9	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)	38.6531	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
										0.000
		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:	29.36	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:	86.60	°F
Sqrt P:	0.270	Inches H20
Ts:	126.56	°F
Vm:	38.106	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:	36.645	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 (%)	-118760.000	
Vs:	16.430	fps
ACFM:	6968.	
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

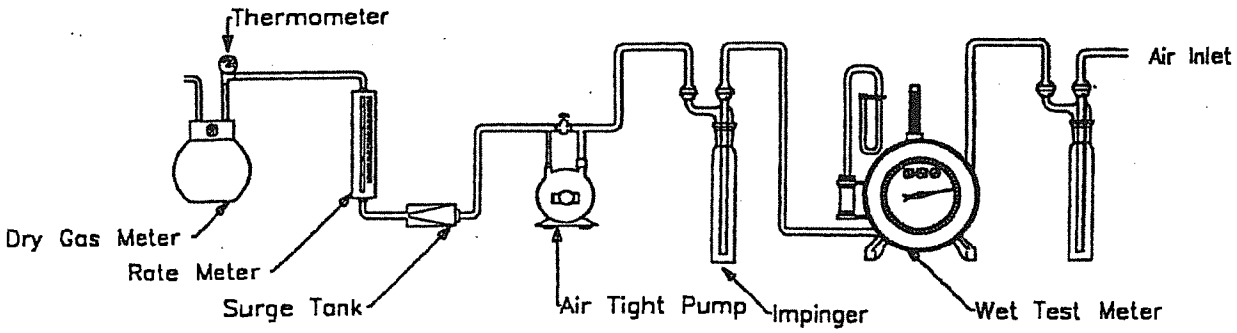
Field Data/Calculated Data

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:	36.653	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 (%)	-118760.000	
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.

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

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 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

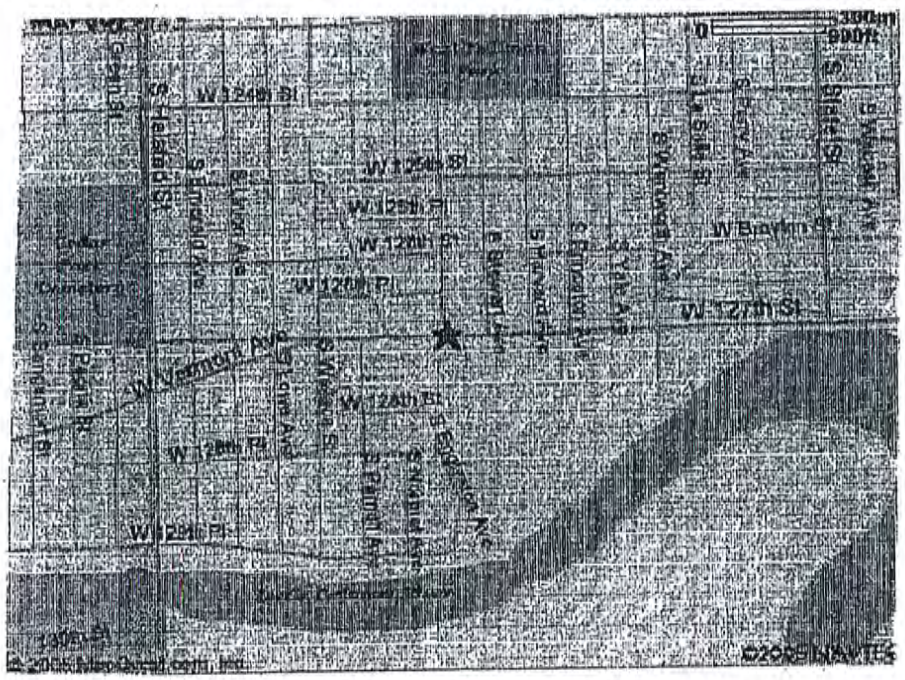


EXHIBIT 200-3 FACILITY DIAGRAM

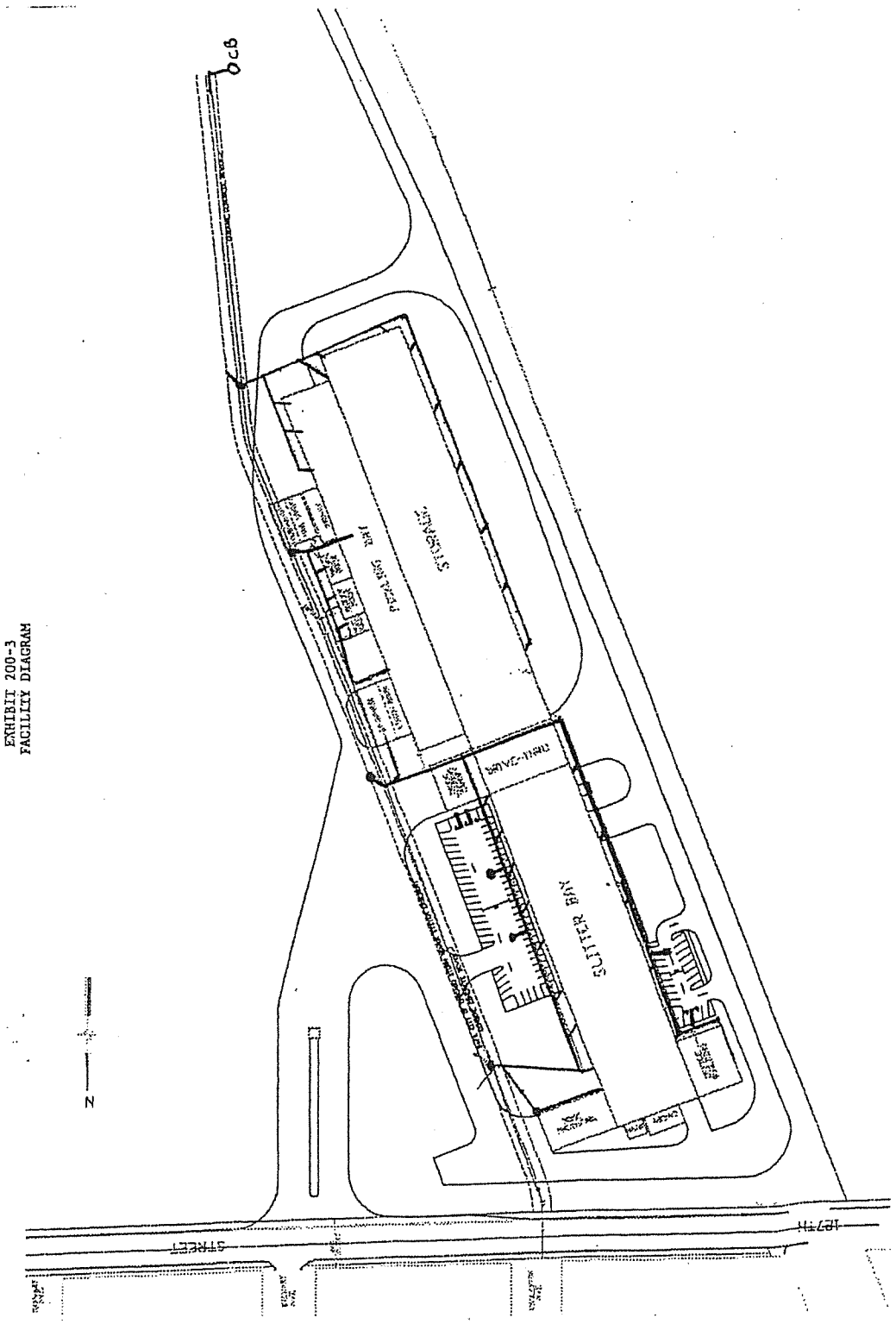


EXHIBIT 200-4 LIST OF INSIGNIFICANT ACTIVITIES

- 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: *9/30/05*	3) SOURCE ID NO. (IF KNOWN): *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
_____

NMLP 0284

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		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
Unscaled Steel Coils	*77,990*	*292,000*	*77,990*	*292,000*

21c) BY-PRODUCT MATERIALS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	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

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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*

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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

☐ [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:						( )				
	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

☐ [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	*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*	*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 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.

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

782-40
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

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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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:

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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*

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.

(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 240-8.

[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

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

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

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

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

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

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

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:
9/30/05

3) SOURCE ID NO. (IF KNOWN):
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
_____

Printed on Recycled Paper
260-CAAPP

NMLP 0313

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*

NMLP 0316

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

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

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:

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.

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. NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation, Respondent.	))))))))))	**PCB No. 13 - 12** (Enforcement – Air)

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

NAME OF EQUIPMENT TO BE CONSTRUCTED OR OPERATED (B): ***HCL Steel Pickling Line, HCL-ASTs***

FOR AGENCY USE ONLY
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

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: ***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:
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: *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 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 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. NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation, Respondent.	))))))))))	**PCB No. 13 - 12** (Enforcement – Air)

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: 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, 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	BY _____ SIGNATURE	_____ DATE
John Dubrock TYPED OR PRINTED NAME OF SIGNER		_____ TYPED OR PRINTED NAME OF SIGNER	
Director of Operations TITLE 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 630-893-2680	
9b. STREET ADDRESS: 429 West 127th Street		12. CONTACT PERSON'S FACSIMILE NUMBER: 630-893-9017	
9c. CITY Chicago		13. FEDERAL EMPLOYER IDENTIFICATION NUMBER (FEIN): 36-4036553	
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. 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. NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation, Respondent.	)	**PCB No. 13 - 12** (Enforcement – Air)

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")

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	*0/-*

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

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*

NMLP 0351

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:
10/3/05

3) SOURCE ID NO. (IF KNOWN):
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

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 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:
10/03/05

3) SOURCE ID NO. (IF KNOWN):
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
_____

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)		

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:

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:

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:

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

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*

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.

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.

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.

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: _____

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
_____

NMLP 0338

(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.

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: _____

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
_____

Printed on Recycled Paper
215-CAAPP

NMET P 0336

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*

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-SUDING 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)

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)?

\

(53) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

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

HAP INFORMATION						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:	*0.1*	*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-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 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.

(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	TONS PER YEAR (TONS/YR)	[2]PERMITTED EMISSION RATE: 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:	0.1	0.44				0.1 (lbs/hr)	40CFR63.115	0.44	0.1 lbs/hr	0.44
HCl	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.

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

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

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.

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.

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):

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
_____

NMLP 0325

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

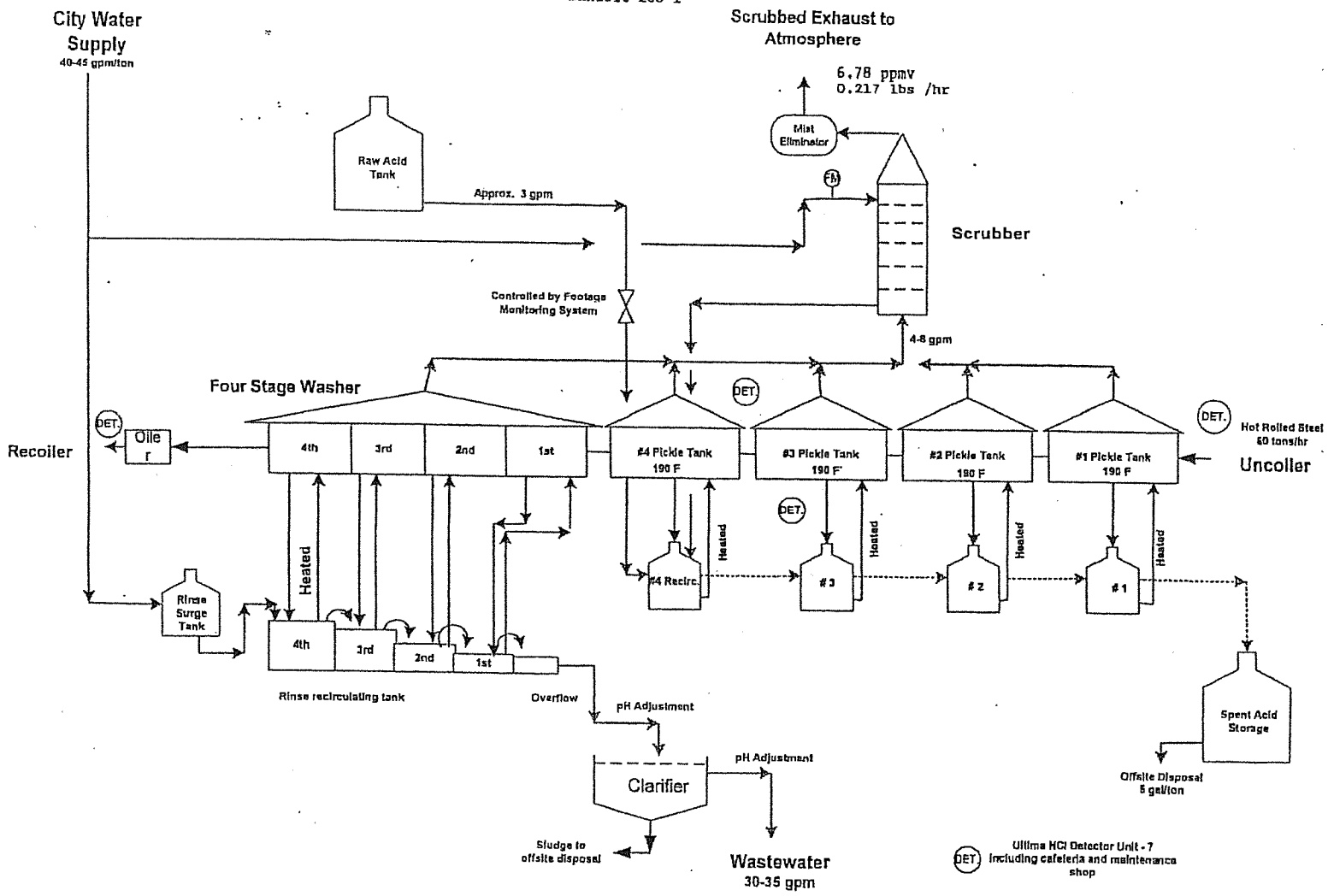
HCL Solution = 8,606,400 lbs HCl Solution per year/7,488 hours per year = **1150 lbs HCl Solution/hr**
or 4,303.2 tpy
Water = 2.6 gpm X 60 min/hr = 156.4 gal/hr = **1,303 lbs/hr or 9,760,140 lbs/yr (4880.1 tpy)**

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.

Exhibit 260-1



NACME Pickling Process Flow Diagram

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):

(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.

(31)EMISSION INFORMATION

REGULATED AIR POLLUTANT		[1]ACTUAL 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:	*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*	*5.0 (LBS/HR)*	*212.321*	*28 PE*	*5.5 LBS/HR*	*22*
	TYPICAL:	*4.00*	*14.4*	*0.24 GR/DSCF*		*4*	*5.5 (LBS/HR)*	*212.321*	*19 PE*		

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.

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 (%)		CONTROL EQUIPMENT EFFICIENCY (%)		OVERALL REDUCTION EFFICIENCY (%)	
		(MIN)	(TYP)	(MIN)	(TYP)	(MIN)	(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.:

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:

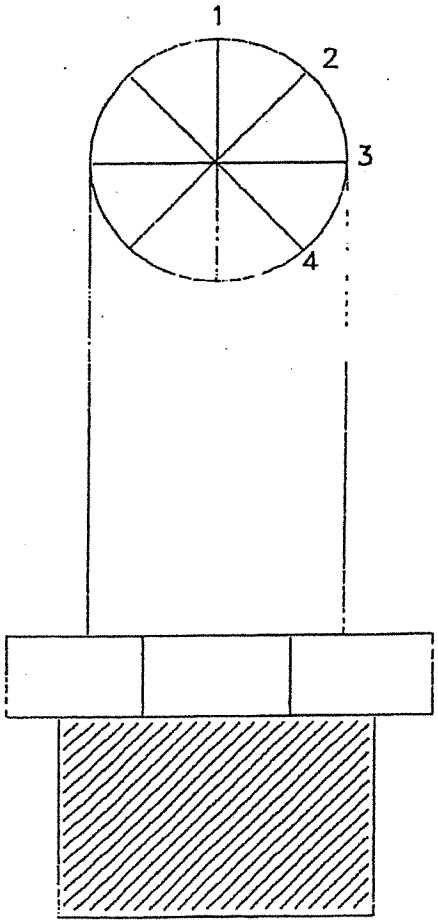
REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Testing notification	*Tst Notification*	*Prior to testing*
Annual Emission Reporting	*Annual Emission Report*	*Annually*

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

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. VOLOSARSKY 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: 5 in.
PORT SIZE: 4 in.
PORT TYPE: nipple

IMPINGER H_2O
FINAL: 536 ml/gm
INITIAL: 450 ml/gm
GAIN: 86 ml/gm
TOTAL H_2O COLLECTED:

SILICA GEL:
FINAL WT: 221.9 gm
INITIAL WT: 215.5 gm
WT. GAIN: 6.4 gm

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.

Customer [illegible]

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.

Form 1005-1

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 60° 2.35 60°

Port-Point No.	Velocity Head (P) in. H_2O	$\sqrt{P}$	Clock Time 24 hr.	Meter Volume (Vm) ft^3	17.87 Orifice. (H) in. H_2O	60° Stack Temp (t_s) °F	Meter Temp. (t_m) Inlet °F	Meter Temp. (t_m) Outlet °F	2.31 Meter Rate cfm	80° Pump Vacuum in. Hg	Notes		Probe Temp. °F	Filter Holder Temp. °F	Impinger Outlet Temp. °F
1	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	67.856	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	82.88	1.1	129	88	86	0.576	3	1.439	82.866	257	255	65
	→		1110	84.312								84.305			
21	0.07	0.265	1117	84.550	1.3	125	85	85	0.622	2	1.554		255	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	99.87	1.3	125	86	85	0.622	2	1.554	99.836	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	126.313		85.604							

GE MOSTARDI PLATT
TEST SUPPORT DATA

TEST RUN NO. 3 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: 5 in.
PORT SIZE: 4 in.
PORT TYPE: nipple

IMPINGER H_2O
FINAL: 553 ml/gm
INITIAL: 450 ml/gm
GAIN: 103 ml/gm
TOTAL H_2O COLLECTED:

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

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: Circular 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.

Customer: Nucor

Test No. 3

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

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

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.

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)

FOID: Region 1
Application File
Compliance & Systems Management Section

ROCKFORD – 4302 N. 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. NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation, Respondent.	)	**PCB No. 13 - 12** (Enforcement – Air)

EXHIBIT F

THOMAS J. REUTER AFFIDAVIT

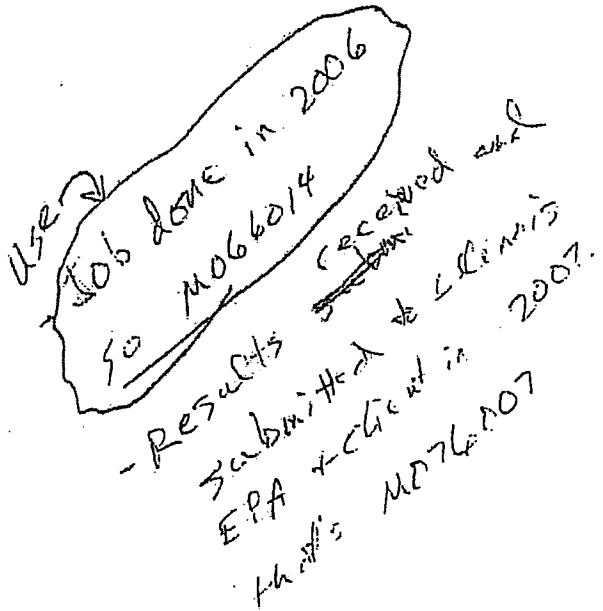
TAB 12
DECEMBER 21, 2006, HYDROGEN CHLORIDE EMISSIONS TEST REPORT ("DECEMBER 2006 STACK TEST REPORT")

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	99.0	97.6	97.6	98.1
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	5,856	5,973	6,272	6,034
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

Program Manager

Chris E. Jensen

Quality Assurance

Jeffrey M. Crivlare

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 Glass probe broke	38000	37840	37710
		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
LINE OPERATOR: DJ

PAGE: 1
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 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	42084	1	1	115	117	60 750	60	60	Z30193	[illegible]	300	735	20% 133	1621
2	Gibral.	Gibral.	N11099	V62371	41980	0	1	117	119	60.750	60	60	Z30194	39450	300	820	133	350
3	"	"	"	V62370	41980	0	1	071	072	"	60	60	Z30195	29500	300	[illegible]	133	350
4	"	"	"	V62369	41730	0	1	071	073	"	60	60	Z30196	39380	300	905	133/	349
5	"	"	"	V62365	41820	0	1	073	076	"	60	60	Z30197	39460	275	940	133, 337/	349
6	"	"	"	V62366	41570	0	1	072	072	"	60	60	Z30198	39620	275	1005	133	350
7	ISGB	ISGB	N10212	V64985	38310	1	0	.221	.222	48.750	49.250	49.250	Z30199	37990	200	1107	337, FIRST COIL OF STACK TEST	103
8	"	"	N10212	V64991	38670	1	0	.220	.222	48.750	49.125	49.125	Z30200	38290	200	1117	999/337,	104
9	"	"	N10212	V64990	38610	1	0	.222	.221	48.750	49.125	44.127	Z30201	38120	200	1125	337/ 354/	1031

369,014 ← CHARGED WEIGHT TOTAL

354,130 ← PRODUCED WEIGHT TOTAL

TOP CODE:	EDGE CODE:
0-DRY 1-OIL DL-DRY LUBE PL-PRE-LUBE	0-MILL EDGE 1-CUT EDGE 2-OR MORE SLIT

SHIFT TOTALS:

			IN	OUT
HOURS:	8	COILS:	20	20
CHARGED:	397	PRODUCED:	387	

National Processing Company - Chicago Division

Form #P3-1 1/99

NMLP 0031

NATIONAL PROCESSING COMPANY
PICKLE LINE
DAILY PRODUCTION/INSPECTION REPORT

DATE: DEC 21ST

PAGE: 2

SHIFT: T-3

LINE OPERATOR: DJ

EXIT OPERATOR: JOHN C.

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	IS6B	IS6B	N16212	V64[illegible]	38120	1	0	.221	.227	48.750	49.125	49.125	[illegible]	38140	200	1:35	3543337	1035
11	"	"	"	V64[illegible]	[illegible]980	1	0	.221	.224	"	49.125	49.125	[illegible]	38105	200	12:00	1337	1038
12	"	"	"	V64[illegible]	38220	1	0	.223	.223	"	49.125	49.125	[illegible]	43970	300	12:10	LAST COIL OF STACK 1337	1633
13	"	"	"	V64[illegible]	[illegible]40	1	0	.225	.222	"	49.125	49.125	[illegible]	39000	300	1:40	337	1048
14	"	"	"	V6[illegible]86	38350	1	0	.221	.224	"	49.125	49.125	[illegible]	[illegible]	300	1:35	337	1132
15	"	"	"	V64[illegible]	38[illegible]	1	0	.221	.221	"	49.125	49.125	[illegible]	38160	300	1:25	337	1041
16	"	"	"	V64[illegible]	[illegible]850	1	0	.221	.221	"	49.125	49.125	[illegible]	[illegible]	300	1:35	282 337	1034
17	"	"	"	V64[illegible]	38[illegible]	1	0	.222	.221	"	49.125	49.250	[illegible]	38100	300	1:35	337	1038
18	"	"	"	V64[illegible]	38[illegible]	1	0	.222	.222	"	49.125	49.125	[illegible]	[illegible]	300	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-CUT MORE SLIT

348,290 = CHARGED WEIGHT TOTAL

343 660 = PRODUCED WEIGHT TOTAL

SHIFT TOTALS:	IN	OUT
HOURS:	COILS:	
CHARGED:	PRODUCED:	

NMC/NPC EAST CHED

JAN-03-2007 16:23

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	TSC113	ESlitter	MO211	U64960	38530	1	0	.221	.222	48.750	49.25	49 1/2	Z3021F	38060	[illegible]	[illegible]	337	1041
20	"	"	"	U64776	38360	1	0	.221	.222	"	49.25	49.25	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:	

National Processing Company - Chicago Division

Form #P3-1 1/99

NMLP 0033

NATIONAL PROCESSING COMPANY
PICKLE LINE
DAILY PRODUCTION/INSPECTION REPORT

DATE: 12.21.06 PAGE: 1

LINE OPERATOR: D. Ibarra SHIFT: 3-11

EXIT OPERATOR: J. Arreola

NO.	BILL TO	SHIP TO	SALES ORDER #	TAG #	ENGOING 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	TSCG	Slitter	011211	V64966	38250	1	0	.222	.220	48.750	49.062	49.125	Z30213	37840	200	2:50	337	1028
2	"	"	"	V64965	38260	1	0	.222	.221	"	49.187	49.187	Z30214	37770	200	3:05	337	1029
3	"	"	"	V64963	38310	1	0	.221	.220	"	49.187	49.187	Z30215	37930	200	3:15	337	1031
4	"	"	"	V64962	38310	1	0	.220	.220	"	49.250	49.187	Z30216	37570	200	3:40	337 999-Brn. Surf/Inclus.	1030
5	"	"	"	V64973	38140	1	0	.221	.221	"	49.187	49.187	Z30217	37710	200	3:50	337	1026
6	"	"	"	V64970	38270	1	0	.221	.220	"	49.187	49.187	Z30218	37790	200	4:00	337	1031
7	"	"	"	V64967	38240	1	0	.222	.221	"	49.187	49.187	Z30219	37800	200	4:15	337 END OF TEST 2	1029
8	"	"	"	V64971	38190	1	0	.221	.221	"	49.250	49.187	Z30220	37710	200	4:45	337 START TEST 3	1028
9	"	"	"	V64970	38220	1	0	.222	.220	"	49.250	49.250	Z30221	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: 501	PRODUCED: 495	

Form #P3-1 1/99

National Processing Company - Chicago Division

NI411 (1/0

NATIONAL PROCESSING COMPANY
PICKLE LINE
DAILY PRODUCTION/INSPECTION REPORT

PAGE: 2

SHIFT: 2 3/11

DATE: 12/21/06

LINE OPERATOR: Dave P.

EXIT OPERATOR:

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	EsgG	Slitter	N10211	V64969	38220	1	0	.223	.221	48 750	49 187	49 187	Z30222	57750	200	5 05	337	1008
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	Steel W	Steel W	N10193	V64902	44844	1	0	.231	.236	48 750	49 187	49 125	Z30227	44130	200	6 05	(999/HLD-Not Edge Trimmed - No 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	47584	1	0	.309	.308	"	49 187	48 875	Z30229	46220	200	6 30	139 (999/HLD-Not Edge Trimmed)	895
18	"	"	"	V64883	47584	1	0	.311	.311	"	49 250	49 062	Z30230	46780	200	6 55	139 (999/HLD-Not Edge Trimmed)	901

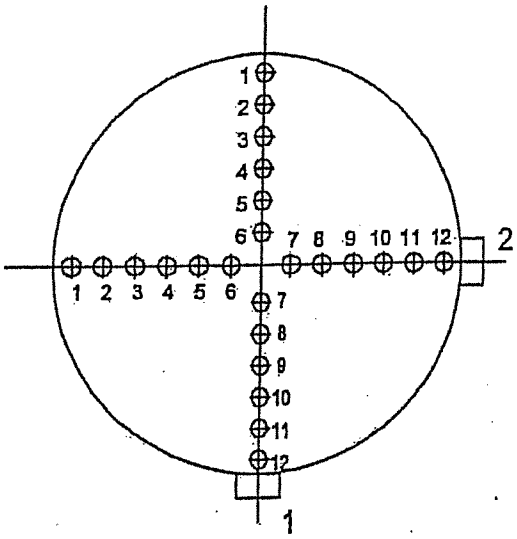
423,695. ← CHARGED WEIGHT TOTAL

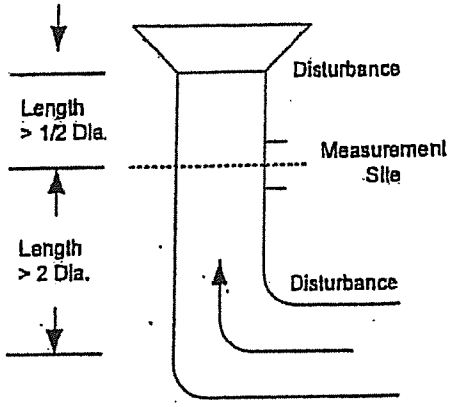
418,500. ← PRODUCED WEIGHT TOTAL

TOP CODE	EDGE CODE
0-DRY 1-OIL DL-DRY LUBE PL-PRE-LUBE	0-MILL EDGE 1-CUT EDGE 2-OR MORE SLIT

SHIFT TOTALS:		IN	OUT
	HOURS:	COILS:	
	CHARGED:	PRODUCED:	

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

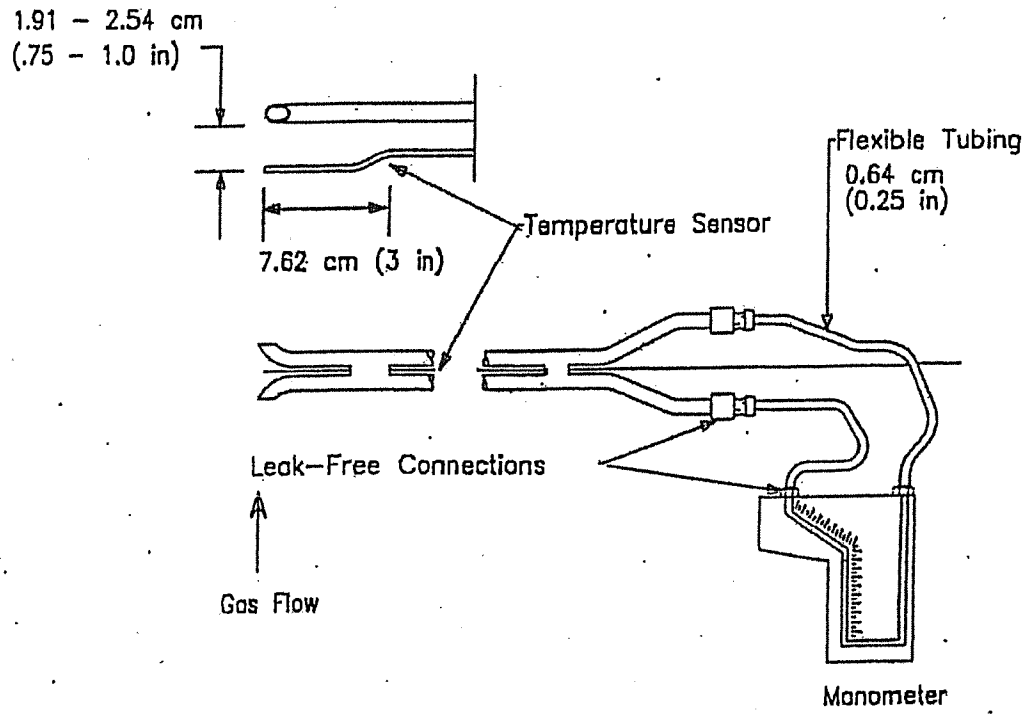
No. of Points per Port : 12

No. of Ports: 2

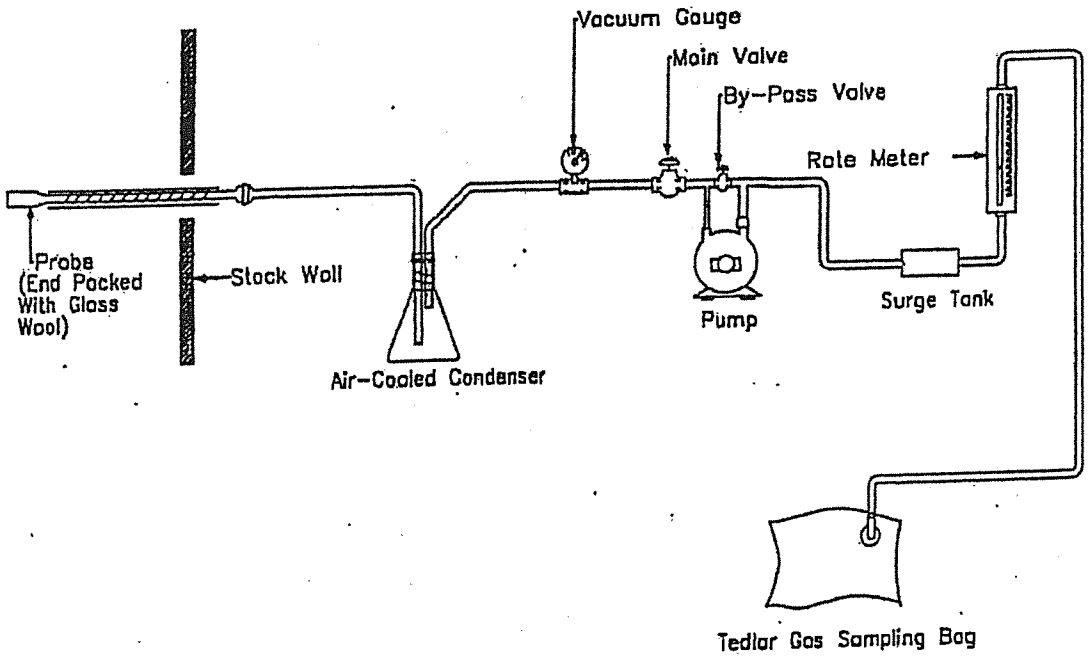
Port Length: 5 Inches

NMLP 0036

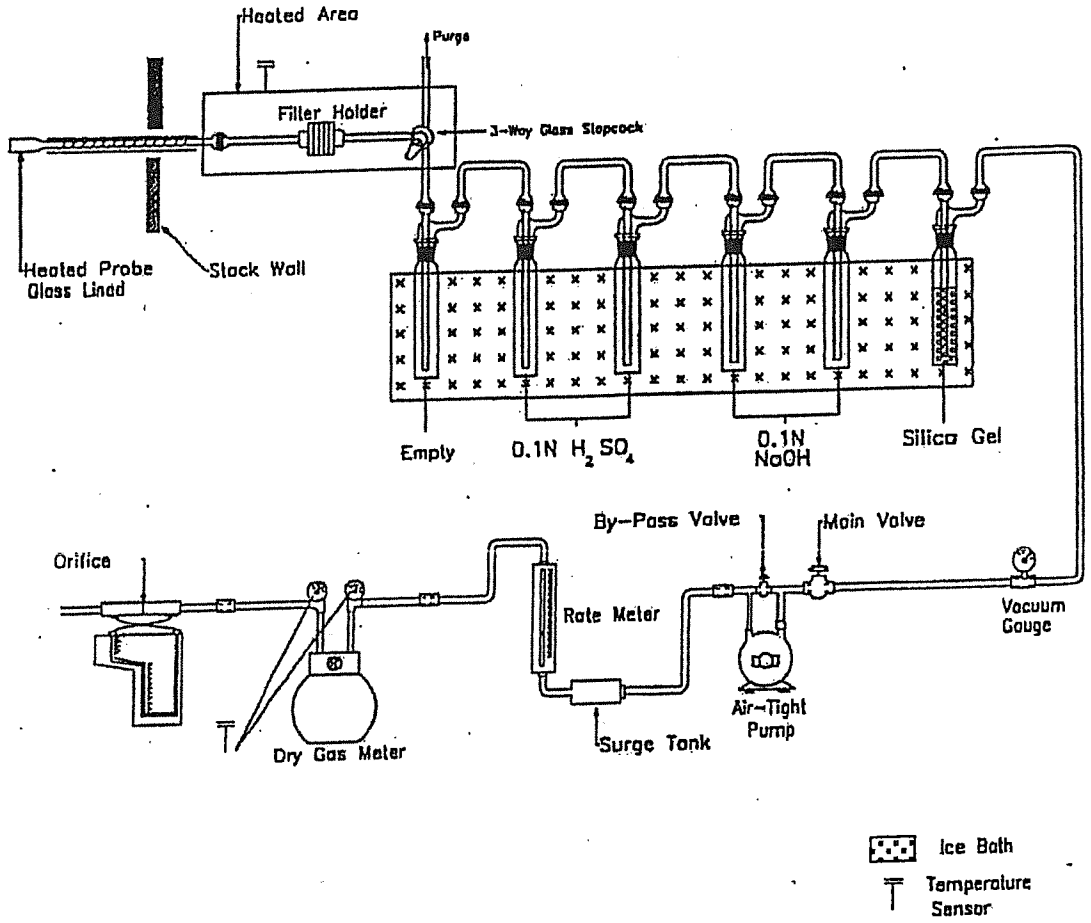
USEPA Method 2 - S-Type Pitot Tube Diagram



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

$$\mu g/\text{lb HCl} = \mu g\ \text{Cl} \times \frac{36.453}{35.453}$$

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. $C_a = \frac{m_a}{V_a \rho_a}$

7. $W_a = C_a V_{aw} \rho_a$

8. $C_{acf} = 15.43 K_1\left(\frac{m_n P_s}{V_{w(std)} + V_{m(std)}\ T_s}\right)$

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_{std} = 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:	80.6	°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	fall	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:	3893.6	ml
Final Impinger Content:	3744.8	ml
Difference:	51.2	
Total Water Gain:	51.2	

Silica Initial Wt.	0	grams
Silica Final Wt.	0	grams
Difference:	0	

Moisture, Bws: 0.064 Supersaturation Value, Bws: 0.061*

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	1.480	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	66	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	17.669
	11:38:00			89.099							
2-1	11:44:00	0.07	0.99	89.099	0.265	98	62	58	3.0	1.491	15.583
2	11:46:30	0.07	0.99	90.590	0.265	98	63	58	3.0	1.490	15.583
3	11:49:00	0.08	1.19	92.080	0.283	98	65	58	3.0	1.640	16.659
4	11:51:30	0.07	0.99	93.720	0.265	98	65	59	3.0	1.490	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	98	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:	0.268	in. H_2O
Stack Temperature, Ts:	99.9	°F
Meter Volume, Vm:	37.399	cf
Meter Volume, Vmstd:	36.793	dscf
Meter Volume, Vwstd:	2.288	wscf
Isokinetic Variance:	97.1	%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:	28.201	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
Final Impinger Content:	2890.6	ml
Difference:	40.2	
Total Water Gain:	46.6	

Silica Initial Wt.	830.8	grams
Silica Final Wt.	839.2	grams
Difference:	8.4	

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. 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	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

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.

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:	28.233	lb/lb mole
Excess Air:	—	%
Gas Velocity, Vs:	18.013	fps
Volumetric Flow:	6,791	acfm
Volumetric Flow:	5,973	dscfm
Volumetric Flow:	6,325	scfm

MOISTURE DETERMINATION

Initial Impinger Content:	2891.8	ml
Final Impinger Content:	2930.8	ml
Difference:	39	
Total Water Gain:	47	

Silica Initial Wt.	825.6	grams
Silica Final Wt	833.6	grams
Difference:	8	

Moisture, Bws: 0.058 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	15:01:00	0.07	1.05	45.563	0.265	96	61	61	3.0	1.557	15.565
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	15.565
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	68	61	3.0	1.540	15.565
8	15:18:30	0.07	1.05	56.410	0.265	98	68	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	15:36:00	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	1.660	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	15.565
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	15.565
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	15.565
10	15:58:30	0.07	1.05	78.98	0.265	98	70	63	3.0	1.550	15.565
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	1.660	16.639
	16:06:00			83.86							

Test Run 3

NMT P 0048

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:	97.8	°F
Meter Volume, Vm:	39.558	cf
Meter Volume, Vmstd:	38.904	dscf
Meter Volume, Vwstd:	2.317	wscf
Isokinetic Variance:	98.8	%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:	28.838	lb/lb mole
Gas Weight wet, Ms:	28.227	lb/lb mole
Excess Air:	—	%
Gas Velocity, Vs:	16.884	fps
Volumetric Flow:	7,088	acfm
Volumetric Flow:	6,212	dscfm
Volumetric Flow:	6,582	scfm

MOISTURE DETERMINATION

Initial Impinger Content:	2867.2	ml
Final Impinger Content:	2908	ml
Difference:	40.8	
Total Water Gain:	49.2	

Silica Initial Wt.	839.2	grams
Silica Final Wt.	847.6	grams
Difference:	8.4	

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	1.660	16.641
2	17:27:30	0.08	1.19	105.01	0.283	97	66	61	3	1.660	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	98	68	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

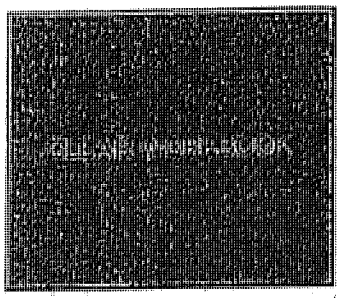
Customer: Nacme Steel Processing, LLC
Plant: Chicago Facility
Location: HCl Scrubber Exhaust Stack

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

Analyte - Emission Data

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					
Initul			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.)

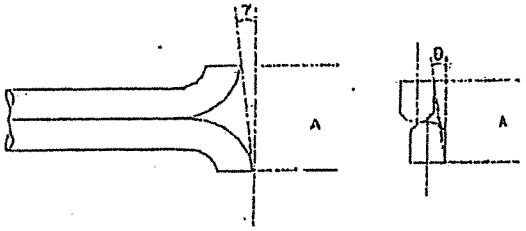
β_1 = 1 °(<5°), β_2 = 1 °(<5°) w = A sin θ = 0.019 (in.); (<0.03125 in.)

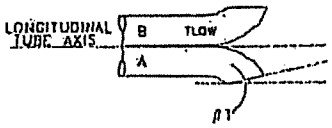
γ = 0 °, θ = 1 °, A = 1.077 (in.) P_A = 0.54 (in.), P_B = 0.54 (in.), D_t = _____ (in.)

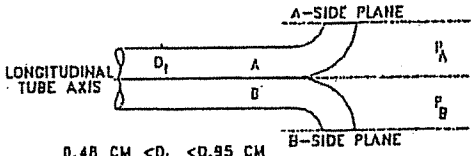
Comments: _____

Calibration required? _____ yes N no

Pitot Tube No.: 38 Date: 12/18/2006 Name: AAS

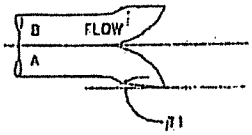


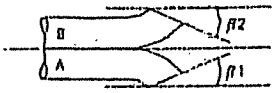


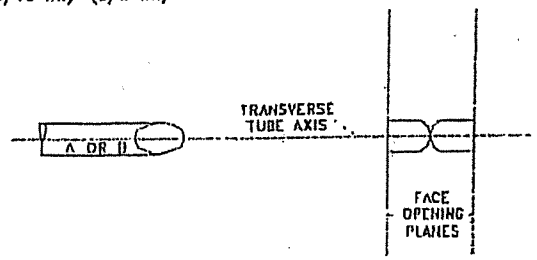


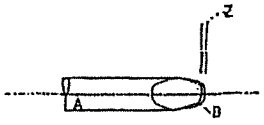
NOTE:
1.05 D_t < P_t < 1.50 D
$P_A = P_B$

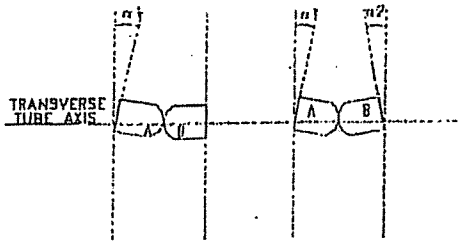
0.48 CM ≤D_t ≤0.95 CM
(3/16 IN.) (3/8 IN.)

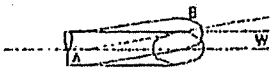












NMLP 0058

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.)

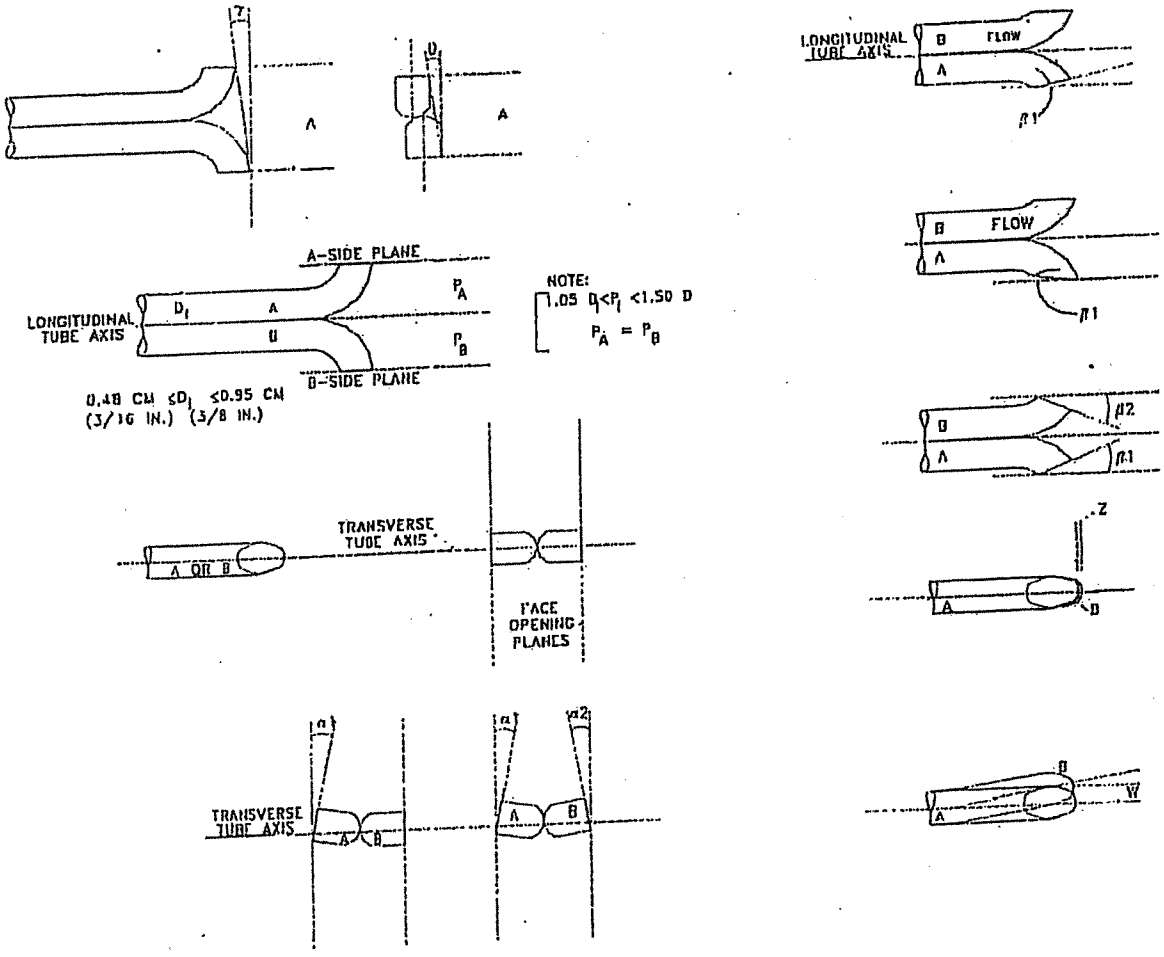
β_1 = 1 ° (<5°), β_2 = 1 ° (<5°) w = A sin θ = 0.019 (in.); (<0.03125 in.)

γ = 0 °, θ = 1 °, A = 1.077 (in.) P_A = 0.54 (in.), P_B = 0.54 (in.), D_t = _____ (in.)

Comments: _____

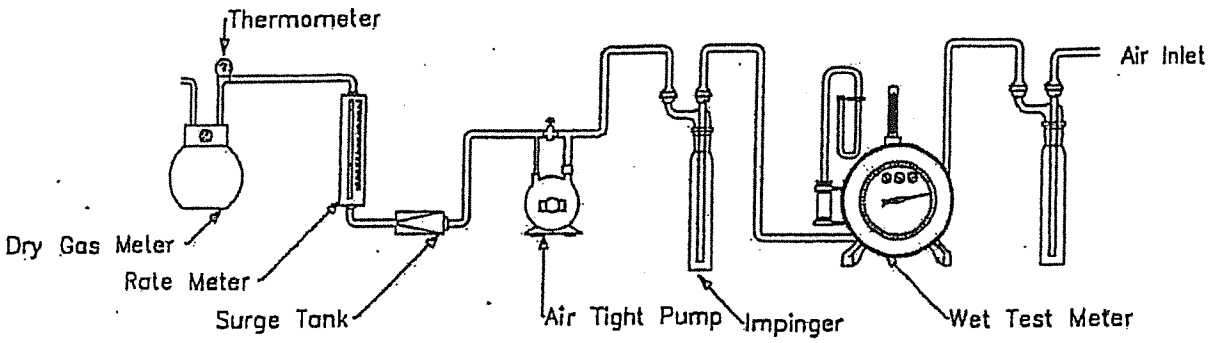
Calibration required? _____ yes N no

Pitot Tube No.: 38 Date: 12/28/2006 Name: AAS



NMLP 0059

Dry Gas Meter Calibration Sample Train Diagram



Isokinetic Sampling Cover Sheet

Plant Information

Run Number: 1 Date: 12/21/06 Project Number: PE2006284
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 TUDER Meter ID: CM13 Meter Y Value: 1.990
Pitot ID: 038A Pitot Coefficient: 1.840 Probe Length: 4'
Probe Liner: GLASS Nozzle Diameter: .374 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: 4692.6 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: _____ Date: 12/21/06 Test Number: 1

Client: NACME STEEL Test Location: HCL SCRUBBER EXHAUST STACK Operator: DAN TUIDER

Plant: CHICAGO 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	1105	.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	259	46
-4	1115:30	.07	.99	75.59	.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	.07	.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

Run Number: 2
Test Location: HCL SCRUBBER EXHAUST STACK
Duct Shape: (Circular) or Rectangular
Source Condition: _____
Port Type: NIPPLE

Plant Information

Date: 12/21/06
Client Name: NACME STEEL
Length: _____ Width: _____ or
Test Method: M26A
Port Length: 5"

Project Number: _____
Plant Name: CHICAGO, IL
Diameter: 36"
Flue Area: 7.069
Port Size: 4"

Meter and Probe Data

Operator: DAN TUIDER
Pitot ID: 038A
Probe Liner: GLASS
Filter Number/Weight: _____

Meter ID: CM13
Pitot Coefficient: .846
Nozzle Diameter: .374

Meter Y Value: .990
Probe Length: 4
Train Type: ANDERSON
Thimble Number/Weight: _____

Pre-Test Nozzle Leak Check: 0.000 @ 10 "Hg
Pre-Test Pitot Leak Check: ✓ @ 5.4 "H_2O

Post-Test Nozzle Leak Check: 0.000 @ 5 "Hg
Post-Test Pitot Leak Check: ✓ @ 5.5 "H_2O

Traverse Data

Ports Sampled: 2
Total Points: 24

Points/Port: 12
Total Test Time: 60

Min./Point: 2.5
Sample Plane: (Horizontal) or Vertical

Stack Parameters

Barometric Pressure: 29.4
CO_2 %: _____
Initial Imp. Volume or Weight: 400
Initial Silica Weight: _____

Static Pressure: .4
O_2 %: _____
Final Imp. Volume or Weight: _____
Final Silica Weight: _____

Determined by: Method 3 or Method 3A
Imp. Volume or Weight Gain: _____
Silica Weight Gain: _____

Balance used for impingers and/or silica weights (Model and S/N): _____

Comments:

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
Test Location: ACI SCRUBBER EXHAUST STACK
Duct Shape: (Circular) or Rectangular
Source Condition: _____
Port Type: NIPPLE

Date: 12/21/06
Client Name: NACME STEEL
Length: _____ Width: _____ or
Test Method: M 26A
Port Length: 5"

Project Number: _____
Plant Name: CHICAGO, IL
Diameter: 36"
Flue Area: 7.069
Port Size: _____

Meter and Probe Data

Operator: DAN TUTOER
Pitot ID: 038A
Probe Liner: _____
Filter Number/Weight: _____

Meter ID: CM13
Pitot Coefficient: .840
Nozzle Diameter: .374

Meter Y Value: .990
Probe Length: 4'
Train Type: ANDERSON
Thimble Number/Weight: _____

Pre-Test Nozzle Leak Check: 0.000 @ 10 "Hg
Pre-Test Pitot Leak Check: ✓ @ 5.5 "H_2O

Post-Test Nozzle Leak Check: 0.000 @ 5 "Hg
Post-Test Pitot Leak Check: ✓ @ 5.1 "H_2O

Traverse Data

Ports Sampled: 2
Total Points: 24

Points/Port: 12
Total Test Time: 60

Min./Point: 2.5
Sample Plane: Horizontal or Vertical

Stack Parameters

Barometric Pressure: 29.4
CO_2 %: 0.0
Initial Imp. Volume or Weight: 400
Initial Silica Weight: _____

Static Pressure: -.4
O_2 %: 21.6
Final Imp. Volume or Weight: _____
Final Silica Weight: _____

Determined by: Method 3 or Method 3A
Imp. Volume or Weight Gain: _____
Silica Weight Gain: _____

Balance used for Impingers and/or silica weights (Model and S/N): _____

Comments:

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	48
-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 @ 20 "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:

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 TOLDER

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	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	111.86	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	.09	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. NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation, Respondent.	)	**PCB No. 13 - 12** (Enforcement – Air)

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.	15)	14) 2,000.00
Application Contains New And/Or Modified Emission Units	15) FOR THE FIRST NEW EMISSION UNIT, ENTER $4,000.		
	16) NUMBER OF ADDITIONAL NEW AND/OR MODIFIED EMISSION UNITS = X $1,000.	16)	17) 0.00
	17) LINE 15 PLUS LINE 16, OR $10,000, WHICHEVER IS LESS.		
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

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

Rev. 6/6/2003
Printed on Recycled Paper
292-CAAPP

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	
		11:07 AM	1:00 PM	3:05 PM	4:45 PM	
Start Time		12:10 AM	2:10 PM	4:15 PM	5:50 PM	Average
End Time						
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

ATTACHMENT C

Q. Well -- yeah. Well, that's a fair question. I guess I'd say within a year how many total facilities are you dealing with in terms of writing a permit -- reviewing and writing a permit for in the year 2000?

A. Several dozens.

Q. Several dozen?

A. Yes.

Q. Do you have any help?

A. No.

Q. So you can't delegate it to somebody to say, "Here, take this and" --

A. No. If it's assigned to me, it's my responsibility to issue. We receive help for

stack test analysis. We have special person assigned for stack test reviews, basically, is all. I do not receive any external help except when I need to have stack test review done professionally.

Q. All right. So I think we've seen -- well, a state operating permit was subsequently issued after you did this review; right?

Q. (By Mr. Walsh) Let me show you what's been marked Exhibit 25. Do you recognize that?

A. Yes.

Q. I'm sorry. And what do recognize it to be?

A. This is stack test review done by specialist.

Q. Done by specialist. You testified earlier that you sometimes -- or you don't yourself review stack tests but you delegate that --

A. Yes.

Q. -- to someone who is a specialist in that area; is that right?

A. Yes.

Q. And was the person that it was delegated to Ken --

A. Erewele.

Q. -- Erewele? That's his name?

A. Uh-huh.

Q. And did you, yourself, delegate it to him?

A. It's pretty much automatic procedure

because stack test report even doesn't go to permit section. It goes to compliance unit which perform these stack test reviews.

Q. All right. So is it your recollection that you knew this was happening? It didn't come to you, and then you delegated it out, or that it -- how did it go? How did it work procedurally?

A. Stack test report arrives to compliance unit, and it's assigned on one of the reviewer. He performs this review, and then we receive copy of the result.

Q. You receive a copy --

A. Yes.

Q. -- of the results. Okay.

And you see the bottom paragraph which reads, "The methodologies and general procedures described in the protocol comply with the testing requirements"?

A. Yeah.

Q. What testing requirements is it talking about there?

A. Testing requirements. It's use of correct test methods, timing, calibration of

page 130

equipment, a lot of technicalities which --

Q. And the right data is included in the report?

A. Yes.

Q. All right. And that's necessary for the state to further process the state operating permit that was pending at the time?

A. Yes.

Q. And it goes on to say, "The compliance section recommends that the BOA accept this test as valid." "BOA" is the bureau of air?

A. Exactly.

Q. Okay.

Brodsky, Valeriy

page 130

Q. (By Mr. Walsh) Let me show you Exhibit 26, and just let me -- we may be able to shortcut this. This is the emissions test that's referred to in the exhibit that we just looked at, Exhibit 25. Is that your understanding?

A. Yes.

Q. But if I understand your testimony, you probably wouldn't have looked at this in any great detail because you send it to the -- Ken

Erewele --

A. Yes.

Q. -- for review?

A. I didn't send it. I said he received. If I need additional information, I go to compliance section and pick up this report to look for some additional data.

Q. All right. So would this report not even come to your permit file in the normal course?

A. We have special file for the facility which stores all tests.

Q. Okay. So -- but would this, in the normal course -- let me just ask you: Did this test get sent to you? Do you remember?

A. No, I do not remember.

Q. And in the normal course, would it be sent to you --

A. No.

Q. -- unless you -- only if you asked for it?

A. Yes.

ATTACHMENT D

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.	)	

NOTICE OF SERVICE

To: See Attached Service List.

PLEASE TAKE NOTICE that I have today served Respondent the THE PEOPLE'S IDENTIFICATION OF RULE 213(f)(1) LAY WITNESSES pursuant to Illinois Pollution Control Board's Order dated April 23, 2013.

Respectfully submitted,

Nancy J. Tikalsky
Assistant Attorney General
Office of the Illinois Attorney General
Environmental Bureau
69 West Washington Street, Suite 1800
Chicago, Illinois 60602
(312) 814-8567

Date: April 30, 2013

THIS FILING IS SUBMITTED ON RECYCLED PAPER

SERVICE LIST

Edward V. Walsh, III
ReedSmith LLP
10 South Wacker Drive
Chicago, Illinois 60606-7507

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

Bradley P. Halloran, Hearing Officer (Notice and Certificate of Service only)
Illinois Pollution Control Board
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

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.	)	

CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that on April 30, 2013, I served true and correct copies of Complainant's **THE PEOPLE'S IDENTIFICATION OF RULE 213(f)(1) LAY WITNESSES** upon the persons and by the methods as follows:

[First Class U.S. Mail]

Edward V. Walsh, III
ReedSmith LLP
10 South Wacker Drive
Chicago, Illinois 60606-7507

[Email Attachment]
Maureen Wozniak
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

[Email Attachment(Notice and Certificate of Service only)-]
Bradley P. Halloran, Hearing Officer
Illinois Pollution Control Board
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

Nancy J. Tikalsky
Assistant Attorney General
Office of the Illinois Attorney General
Environmental Bureau
69 West Washington Street, Suite 1800
Chicago, IL 60602
(312) 814-8567

Date: April 30, 2013

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
v.	)	**PCB No. 2013 - 12**
	)	(Enforcement – Air)
NACME STEEL PROCESSING, LLC,	)	
a Delaware limited liability corporation,	)	
	)	
Respondent.	)	

THE PEOPLE'S IDENTIFICATION OF RULE 213(f)(1) LAY WITNESSES

Plaintiff, PEOPLE OF THE STATE OF ILLINOIS ("People"), by its attorney, LISA MADIGAN, Attorney General of the State of Illinois, hereby furnishes, pursuant to Illinois Supreme Court Rule 213(f)(1), the identities and addresses of witnesses who will testify at hearing and identifies the subjects on which each witness will testify.

The People state that based on information in their possession at this time, they intend to call the following witnesses:

1. George Ordija, Illinois EPA – Environmental Protection Specialist, Bureau of Air, Division of Air Pollution Control. Mr. Ordija is expected to testify in support of the violations alleged in the People's Complaint, including his observations at and around Nacme facility located at 429 West 127th Street, Chicago, Cook County, Illinois ("Facility") during his inspections on ..... September 28, 2010. Mr. Ordija is also expected to testify about his conversations with Nacme personnel. In addition, Mr. Ordija is expected to testify about documents and correspondence submitted by Nacme to the Illinois EPA. Mr. Ordija may be contacted through the People's counsel. The People's investigation in this matter is continuing, and the People reserve the right to further supplement and update the extent of Mr. Ordija's testimony.

2. Yasmine Keppner-Bauman, IEPA, Illinois EPA – Environmental Protection Specialist, Bureau of Air, Division of Air Pollution Control. Ms. Keppner-Bauman is expected to testify about her knowledge and familiarity of violations against the Nacme Facility. Ms. Keppner-Bauman is also expected to testify about her conversations with Nacme personnel. In addition, Ms. Keppner-Bauman is expected to testify about documents and correspondence exchanged between Nacme and the Illinois EPA. Ms. Keppner-Bauman may be contacted through the People's counsel. The People's investigation in this matter is continuing, and the People reserve the right to further supplement and update the extent of Ms. Keppner-Bauman's testimony.

3. Valeriy Brodsky, Illinois EPA, Environmental Protection Engineer, Bureau of Air, Division of Air Pollution Control. Mr. Brodsky is expected to testify in support of the violations alleged in the People's Complaint, including his familiar with permit applications and permit-related communications and documentation, including stack tests, associated with the Nacme Facility. Mr. Brodsky is also expected to testify about his conversations with Nacme personnel and Nacme's environmental consultants. In addition, Mr. Brodsky is expected to testify about documents and correspondence submitted by Nacme and its environmental consultants to the Illinois EPA. Mr. Brodsky may be contacted through the People's counsel. The People's investigation in this matter is continuing, and the People reserve the right to further supplement and update the extent of Mr. Brodsky's testimony.

4. Harish Narayen, Illinois EPA, Regional Manager, Bureau of Air, Division of Air Pollution Control, Des Plaines Field Operation Section. Mr. Narayen is expected to testify in support of the violations alleged in the People's Complaint, including his familiar with permit applications and permit-related communications and documentation, including stack tests,

associated with the Nacme Facility. In addition, Mr. Narayen is also expected to testify about his conversations with Nacme personnel and Nacme's environmental consultants; and about documents and correspondence submitted by Nacme and its environmental consultants to the Illinois EPA. Mr. Narayen may be contacted through the People's counsel. The People's investigation in this matter is continuing, and the People reserve the right to further supplement and update the extent of Mr. Narayen's testimony.

5. Bob Bernoteit, Illinois EPA, Manager, Bureau of Air, Division of Air Pollution Control, Federally Enforceable State Operating Permit Unit. Mr. Bernoteit is expected to testify in support of the violations alleged in the People's Complaint, including his familiarity with permit applications and permit-related communications and documentation, including stack tests, associated with the Nacme Facility. Mr. Bernoteit is also expected to testify about his conversations with Nacme personnel and Nacme's environmental consultants. In addition, Mr. Bernoteit is expected to testify about documents and correspondence submitted by Nacme and its environmental consultants to the Illinois EPA. Mr. Bernoteit may be contacted through the People's counsel. The People's investigation in this matter is continuing, and the People reserve the right to further supplement and update the extent of Mr. Bernoteit's testimony.

6. David Bloomberg, Illinois EPA, Manager, Bureau of Air, Division of Air Pollution Control, Air Quality Planning Section; formerly Manager, Air Compliance Section. Mr. Bloomberg is expected to testify in support of the violations alleged in the People's Complaint, including his knowledge regarding the sending of Violation Notice, the rejection of the Compliance Commitment Agreement ("CCA"), and Notice of Intent to Pursue Legal Action ("NITPLA") processes. Mr. Bloomberg may be contacted through the People's counsel. The

People's investigation in this matter is continuing, and the People reserve the right to further supplement and update the extent of Mr. Bloomberg's testimony.

7. John DuBrock, Nacme, General Manager of the Facility. Mr. DuBrock is expected to testify about Nacme's operations at its Facility and about the violations alleged in the People's Complaint.

8. Bob Hendrickson, Nacme, Plant Manager of the Facility. Mr. Hendrickson is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.

9. Tom Beach, Nacme, Vice President and Plant Manager. Mr. Beach is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.

10. William Reichel, Nacme, Plant Manager of the Facility. Mr. Reichel is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.

11. Vytas Ambutas, Nacme. Mr. Ambutas is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.

12. Bob Wisdom, Nacme, Manager. Mr. Wisdom is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.

13. Britt Wenzel, Mostardi Platt Environmental Services, Inc., Manager, Environmental Compliance Management/environmental consultant for Nacme for the Facility.

Mr. Wenzel is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.

14. Jamie C. Iatropulos, Mostardi Platt Environmental Services, Inc., Staff Consultant, Environmental Compliance Management/environmental consultant for Nacme for the Facility. Mr. Iatropulos is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.

15. Chris E. Jensen, Mostardi Platt Environmental Services, Inc., Program Manager, Environmental Compliance Management/environmental consultant for Nacme for the Facility. Mr. Jensen is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.

16. Timothy E. Russ, Mostardi Platt Environmental Services, Inc., Program Manager, Environmental Compliance Management/environmental consultant for Nacme for the Facility. Mr. Russ is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.

17. James F. Robertson, Mostardi Platt Environmental Services, Inc., Project Manager, Environmental Compliance Management/environmental consultant for Nacme for the Facility. Mr. Robertson is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.

18. Jeffrey M. Crivlare, Mostardi Platt Environmental Services, Inc., Project Manager, Environmental Compliance Management/environmental consultant for Nacme for the Facility. Mr. Crivlare is expected to testify about Nacme's operations and air permits at its Facility and about the violations alleged in the People's Complaint.

19. Gayle E. O'Neill, Ph.D., TEI Analytical, Inc. for Mostardi Platt Environmental Services, Inc., Environmental Compliance Management/environmental consultant for Nacme for the Facility. Dr. O'Neill is expected to testify about Laboratory Reports of stack test data.

20. Rebuttal Witnesses. The People intend to call rebuttal witnesses at trial as necessary. The People further state that their investigation continues and that they reserve the right to supplement their response to this Interrogatory and the disclosure of lay witnesses and the subjects on which each witness will testify as additional information becomes available (*e.g.* after the Board's decision on the People's Motion to Strike and Dismiss Respondent's Amended Affirmative Defenses, conducting depositions and/or Nacme's Supplementing its Discovery Responses).

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,
LISA MADIGAN,
Attorney General of the State of Illinois

BY: _____

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ATTACHMENT E

ILLINOIS POLLUTION CONTROL BOARD
April 23, 2013

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB 13-12
	)	(Enforcement – Air)
NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation,	)	
	)	
	)	
Respondent.	)	

HEARING OFFICER ORDER

On April 18, 2013, the parties filed an agreed motion to revise the existing discovery schedule. The motion is accepted to the extent as follows.

The parties must disclose all lay witnesses who may testify on or before April 30, 2013. The parties must complete all lay witness depositions on or before May 31, 2013. The parties must disclose all expert witnesses who may testify on or before June 28, 2013. The parties must file rebuttal reports of expert witnesses on or before July 31, 2013. The parties must complete all depositions of expert witnesses on or before August 30, 2013. Discovery closes on August 30, 2013.

The parties or their legal representatives are directed to appear at a telephonic status conference with the hearing officer on May 16, 2013, at 9:30 a.m. The telephonic status conference must be initiated by the complainant, but each party is nonetheless responsible for its own appearance. At the conference, the parties must be prepared to discuss the status of the above-captioned matter and their readiness for hearing.

IT IS SO ORDERED.

Bradley P. Hellon

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center, Suite 11-500
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Chicago, Illinois 60601
312.814.8917
Brad.Halloran@illinois.gov

CERTIFICATE OF SERVICE

It is hereby certified that true copies of the foregoing order were mailed, first class, on April 23, 2013, to each of the persons on the service list below.

It is hereby certified that a true copy of the foregoing order was hand delivered to the following on April 23, 2013:

John T. Therriault
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