ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

PROJECT SUMMARY for the
DRAFT CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Olin Corporation
427 North Shamrock Street, East Alton, Madison County

Illinois EPA ID Number: 119020AAG

Application Number: 96030015

Application Type: Initial Permit

Start of Public Comment Period: 09/19/2007

Close of Public Comment Period: 10/19/2007

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(This Project Summary generally describes the source and explains the draft permit. This document has been prepared pursuant to Section 39.5(8)(b) of the Illinois Environmental Protection Act, which requires "a statement that sets forth the legal and factual basis for the draft CAAPP permit conditions.")

I. INTRODUCTION

This source has applied for an initial Clean Air Act Permit Program (CAAPP) operating permit. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by Title V of the federal Clean Air Act and Section 39.5 of Illinois' Environmental Protection Act. The conditions in a CAAPP permit are enforceable by the Illinois Environmental Protection Agency (Illinois EPA), the USEPA, and the public. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

A CAAPP permit contains conditions identifying the applicable state and federal air pollution control requirements that apply to a source. The permit also establishes emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit. Further explanations of the specific provisions of the draft CAAPP permit are contained in the attachments to this document, which also identify the various emission units at the source.

It should be noted that above referenced draft permit incorporates revisions made to a prior draft permit which was previously submitted to public notice. These changes were mandated based upon changes at the source, subsequent revision of the initial CAAPP permit application, and comments from both the source and the public.

II. GENERAL SOURCE DESCRIPTION

a. Nature of Source

Olin Brass, located at 427 North Shamrock Street, East Alton, in Madison County, produces more than 50 copper-based alloys which are utilized to make specialized sheet and strip products for a diverse array of industries. Worldwide markets for the high-performance copper-based alloy products include automotive, builder's hardware, microelectronics, communications, ammunition, and coinage. Major facilities at East Alton, Illinois include casting and rolling mills.

The process of manufacturing copper-based alloys begins after inspected raw materials are separated by alloy composition, compacted into bales and placed in melting furnaces. Most Olin alloys are cast using a direct-chill technique which produces multiple ingots. Strict quality control procedures are used to verify

chemistry of each melt. To form the ingots, molten metal is poured, cooled and solidified under closely controlled conditions.

After casting is complete, the ingots are reduced from seven inches thick to less than one inch by multiple passes on a hot-rolling mill. Through a series of computer-controlled passes, Olin's cold-rolling tandem mill further reduces the strip thickness to one-tenth of an inch. Other mills are used to reduce the strip thickness even further in order to meet the customer's specifications.

Olin's annealing equipment offers the high degree of versatility needed to meet precise customer metallurgical requirements. Strip thickness, alloy, final product specifications and other factors are considered in determining which of Olin's annealing processes (strip annealing or bell annealing) are used. A computer controlled system closely monitors and controls exact operating parameters throughout the annealing process to ensure that the final anneal achieves the customer's desired mechanical properties and surface finish requirements.

Following final anneal and cleaning, if necessary, a portion of the metal is stamped, slit or drawn into its final shape with equipment at East Alton before it is shipped to the customer. Some of the metal is also sent to the Winchester Division for use in the manufacture of ammunition.

Olin's Winchester division manufactures ammunition components and assembles the components to make small arms ammunition for worldwide markets. Winchester products include: centerfire ammunition (up to 50 caliber); shotshell ammunition and ammunition components (i.e., primers, shellcases, powder, shot, bullets, etc.).

The manufacture of ammunition can be broken down into four common segments; shellcase; source of ignition; propellant; and projectile.

Shellcases for centerfire ammunition, and other associated parts are fabricated from metal strip (brass or steel). Plastic tubes are also used in shotshell assembly.

Primer mix, the source of ignition, is manufactured and added to the shellcase. The primer is used to ignite the propellant. Sealants are used to ensure that the primer is waterproofed.

The propellant is then added to the shellcases in accordance with the ammunition specifications. The propellant is not manufactured at the source. For banks the end of the shellcase is crimped and sealed with a color coded lacquer to identify the charge.

The final step in the manufacture process is the assembly of the projectile into the loaded ammunition. Bullets are inserted into the shellcase, with a waterproofing compound used as a sealant. For shotshells, a wad is used to separate the projectile (shot) from the propellant.

As described in Sections 4.0 and 7.0 of the permit, Olin utilizes a wide variety of particulate matter control devices on various processes; these include cyclones, baghouses, filters, mist eliminators and fume suppressants.

b. Ambient Air Quality Status for the Area

The source is located in an area that is currently designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment) and/or $PM_{2.5}$ and attainment or unclassifiable for all other criteria pollutants (carbon monoxide, lead, nitrogen dioxide, PM_{10}, and sulfur dioxide).

c. Major Source Status

The source requires a CAAPP permit as a major source of PM_{10}, $PM_{2.5}$, nitrogen oxides (NO_x), volatile organic material (VOM) and carbon monoxide (CO) emissions.

d. Source Emissions

The following table lists annual emissions of criteria pollutants from this source, as reported in the Annual Emission Reports sent to the Illinois EPA.

	Annual Emissions (tons)				
Pollutant	**2002**	**2003**	**2004**	**2005**	**2006**
CO	1,684.03	2,126.00	2,104.00	2,180.00	2,070.00
NO_x	101.33	97.80	97.80	103.20	99.94
Total PM	150.29	161.00	164.00	164.60	215.19
PM_{10}	138.80	150.00	152.00	153.10	203.74
$PM_{2.5}$	----	116.00	117.00	119.20	169.48
SO_2	4.70	0.70	0.68	0.72	0.68
VOM	51.88	52.30	57.30	61.20	93.24
MC (top HAP)	2.84	2.30	3.01	4.10	2.88
CR6	0.0000	0.0014	0.0006	0.0007	0.0008
Lead	0.17	0.18	0.18	0.20	0.18

MC Methylene Chloride (Dichloromethane)

CR6 Hexavalent chrome

III. NEW SOURCE REVIEW/TITLE I CONDITIONS

This draft permit contains terms and conditions that address the applicability of permit programs for new and modified sources under Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the draft permit by T1, T1R, or T1N. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this draft permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new conditions or revise such conditions in a Title I permit, those conditions are consistent with the information provided in the CAAPP application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This draft permit would establish new Title I requirements and newly revised Title I requirements.

IV. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source. In addition, the draft permit requires the source to certify its compliance status on an annual basis.

The source is operating under the Illinois Pollution Control Board Order PCB 1994-017, dated February 17, 1994 located at http://www.ipcb.state.il.us/documents/dsweb/Get/Document-19035/.

The order and corresponding stipulation and settlement agreement, filed on January 6, 1994, identifies emission units which are subject to 35 IAC 219 Subparts F and TT and establishes a compliance plan (See Sections 7.4 and 7.6, respectively of the draft permit).

V. PROPOSED ILLINOIS EPA ACTION/REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested by the Illinois EPA for the draft or proposed permit, pursuant to 35 IAC Part 252 and Sections 39.5(8) and (9) of the Illinois Environmental Protection

Act. A final decision on the draft or proposed permit will not be made until the public, affected states, and USEPA have had an opportunity to comment. The Illinois EPA is not required to accept recommendations that are not based on applicable requirements. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.

ATTACHMENT 1: Summary of Source-Wide Requirements

The following tables indicates the source-wide emissions control programs and planning requirements that are applicable to this source. These programs are addressed in Sections 5 and 6 of the draft permit.

Program/Plan	Applicable
Emissions Reduction Market System (ERMS)	No
Nitrogen Oxides (NO_x) Trading Program	No
Acid Rain Program	No
Compliance Assurance Monitoring (CAM) Plan	No
Fugitive Particulate Matter (PM) Operating Program[1]	Yes
Risk Management Plan (RMP)	No
PM_{10} Contingency Measure Plan	No

1. The fugitive PM operating program is required to significantly reduce fugitive particulate matter emissions from certain affected locations and facilities (35 IAC Part 212.309 – 212.312). Normally, elements of this program include, but are not limited to, addressing normal traffic pattern roads, parking facilities, and material piles and handling through the use of water, oils, or chemical dust suppressants.

Table 1 (Section 5.0 of the draft permit)

Applicable Rules and Requirements	
Emission Standards	• 35 IAC 212.301 and 212.314: General limitation requires that there be no visible fugitive particulate matter emissions be observed beyond the sources property line. (See Section 5.3.2(a)). • 35 IAC 212.123(a): General limitation requires that no smoke or other particulate matter be emitted with an opacity greater than 30 percent. (See Section 5.3.2(b)) • 35 IAC 212.302(a): Fugitive particulate matter requirements set in 35 IAC Sections 212.304 through 212.310 and 212.312. Operating program required. (See Section 5.3.3) • 40 CFR Part 82, Subpart F: General limitation requires that the source comply with the federal requirements regarding the operation, maintenance, service, repair, and/or disposal of appliances containing Ozone Depleting Substances. • 40 CFR Part 68: General limitation requires that the source comply with the federal requirements regarding a Risk Management Plan (RMP) for Chemical Accident Prevention in 40 CFR Part 68 if the source becomes subject to the requirements. • New or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B: General limitation requires that the source comply with any new promulgated regulations. • 35 IAC 244.141, 244.142, and 244.143: General limitation requires that the source and have on file with the Illinois EPA a written episode action plan.
Non-Applicability	• 40 CFR Part 61, Subpart C: National Emission Standard for Beryllium: Emission units at the source do not meet the applicability criteria in 40 CFR 61.30 (See Condition 5.5.1). • 40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants: Miscellaneous Metal Parts and Products Surface Coating Operations: The source is not a major source of HAP emissions (See Conditions 5.6.2 and 5.6.3) • 40 CFR Part 63, Subpart SSSS, National Emission Standards for Hazardous Air Pollutants: Metal Coil Surface Coating Operations: The source is not a major source of HAP emissions (See Conditions 5.6.2 and 5.6.3) and the materials applied in the strip lubrication operation (See Section 7.6) are not considered to be a coating as defined in 40 CFR 63.5110

Non-applicability (Continued)	• 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters because the source is not a major source of HAP emissions (See Conditions 5.6.2 and 5.6.3). • 40 CFR Part 63, Subpart FFFFFF, National Emission Standards for Hazardous Air Pollutants for Secondary Copper Smelting Area Sources: The source is not a secondary copper smelter as defined in 40 CFR 63.11158 • 35 IAC 212.304: Fugitive particulate matter from all storage piles; conveyor loading operations to the piles; and the normal traffic pattern access areas surrounding the piles at the source are less than 50 tons/year. • 35 IAC 212.316 and 212.324: The source does not meet the applicability criteria in 35 IAC 212.316(a) and 212.324(a) • 35 IAC Part 212 Subpart U: The source does not meet the applicability criteria in 35 IAC 212.700. • 35 IAC 219 Subpart TT: Subject emission units at the source as a group are limited to less than 100 tons per calendar year in Condition 7.6 and 35 IAC 219.980(a)(2).
Title I Conditions	• The draft permit contains source-wide limits on operation and emissions of HAPs from the source in Conditions 5.6.2 and 5.6.3. These limits were incorporated from Permit 05030067. • The draft permit contains new source-wide limits on operation and emissions for fuel combustion operations in Conditions 5.6.4.
Periodic Monitoring (other than basic regulatory requirements)	
Testing	35 IAC 201.282 and Section 4(b) of the Act: General source-wide testing requirements and HAP testing to verify minor source status in Conditions 5.7.1 and 5.7.2
Emissions Monitoring	None
Operational Monitoring	None
Inspections	None

Recordkeeping	• Annual Emission Records o Total annual source-wide emissions for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) in order to demonstrate compliance with Condition 5.6.1. • Records for HAP Emissions o HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) in order to demonstrate compliance with Condition 5.6.2. o Test results for the tests required by Condition 5.7.2 o MSDS or equivalent document showing the formulation of each coating or HAP containing material • Records for Other Source-Wide Emission Limitations o Uncontrolled fugitive particulate emissions from all storage piles; conveyor loading operations to the piles; and the normal traffic pattern access areas surrounding the piles at the source in order to verify that compliance with Condition 5.4.6 and 35 IAC 212.304. o Natural gas, propane, and No. 2 fuel oil usages and source-wide fuel combustion emissions in order to verify compliance with Condition 5.6.4. o Plans and monitoring and test results in order to verify compliance with Condition 5.3.3 o Documentation and records of the beryllium content of the alloys melted, cast, and machined at the source in order to verify compliance with Conditions 5.4.1 and 5.5.1. • Retention and Availability of Records o General records requiring that records be readily accessible to the Illinois EPA or USEPA
Reporting	
Prompt Reporting	• Operational limits specified in Conditions 5.6.4 within 30 days • Combustion emission limits for NOx and CO specified in Conditions 5.6.4 within 30 days • General deviation from the requirements of the permit within 30 days • Attachment 3
Other Reporting	None
Other Information	
Footnotes	None

ATTACHMENT 2: Summary of Requirements for Specific Emission Units

The following tables include information on the requirements that apply to significant emission units at this source. The requirements are found in Section 7 of the draft permit, which is further divided into subsection, i.e., Section 7.1, 7.2, etc., for the different categories of units at the source. A separate table is provided for each subsection in Section 7 of the draft permit. An explanation of acronyms and abbreviations is contained in Section 2 of the draft permit.

Table 1 (Section 7.1 of the draft permit)

Emission Unit	
Name	Casting Operations
Description	Multiple emission units associated with casting operations. (See the descriptions in Section 7.1.1 and 7.1.2)
Date Constructed	Dates of Construction are listed in Section 7.1.2
Emission Control Equipment	The source utilizes various cyclones, baghouses, and filters for theses emission units (Section 7.1.1 and 7.1.2)
Applicable Rules and Requirements	
Emission Standards	• 35 IAC 212.321(a): General PM process limit. • 35 IAC 219.301: General volatile organic material (VOM) process limit. • 35 IAC 214.301: General SO_2 process limit • 40 CFR 60 Subparts A and M: NSPS for Secondary Brass and Bronze Production Plants limits opacity. • 35 IAC 212.307 and 212.213: Reiterates the operating program requirements in Condition 5.3.3.
Streamlining	• Not Applicable

Title I Conditions	• The draft permit contains limits on operation and emissions in 7.1.6(a) for the Ascast furnaces 1 and 2 and the melt furnaces on DC Casting Unit Numbers 1 through 5. These limits were incorporated from Permit 03060079. • The draft permit contains limits on operation and emissions in 7.1.6(b) for the #1 and #2 Horizontal Casting Units with their associated Baghouse (BH-3). These limits were incorporated from Permit 04020062. • The draft permit contains limits on operation and emissions in 7.1.6(c) for the Metals Research Laboratory (MRL) Furnace (MF-30) with the associated spark arrester and MRL Baghouse (BH-8). These limits were incorporated from Permit 04010031.
Title I Conditions (Continued)	• The draft permit contains limits on operation and emissions in 7.1.6(d) for the 1F mix muller, low profile turbine mixer and induction form operations with the associated furnace building cartridge filter system (CF-1). These limits were incorporated from Permit 04090009.
Non-applicability	• 35 IAC 217.121& 35 IAC 216.121: Charcoal burner is not by definition a fuel combustion emission unit (See 35 IAC 211.2470)
Periodic Monitoring (other than basic regulatory requirements)	
Testing	None
Emissions Monitoring	None
Operational Monitoring	Part of the recordkeeping and compliance procedures requirements in Conditions 7.1.9 and 7.1.12 of the draft permit, respectively • Differential Pressure Monitoring • Monthly Operational Inspections • Visible Emission Observations • Broken Bag Observations • See Attachment 5 (Pressure Drop Monitoring Schedule and Visible Emission Compliance Demonstration) of the draft Permit
Inspections	None
Recordkeeping	• Casting plant operation • Air Pollution Control Equipment o Baghouse pressure monitoring, visible emission observations, and operational inspections required in Condition 7.1.8 with a log of all repairs and corrective actions. • 40 CFR 60 Subpart M - Standards of Performance for Secondary Brass and Bronze Production Plants
Other	None

Reporting	
Prompt Reporting	Report within 30 days • Attachment 3
Other Reporting	None
Operational Flexibility	Allows individual baghouse compartments to be isolated for off-line cleaning, maintenance, or repairs without removing the emission units that are controlled by these baghouses from service. (Condition 7.1.11)
Other Information	
Footnotes	None

Table 2 (Section 7.2 of the draft permit)

Emission Unit	
Name	Unit 02 – Brass Operations
Description	Multiple emission units associated with brass operations. (See the descriptions in Section 7.2.1 and 7.2.2)
Date Constructed	Dates of Construction are listed in Section 7.2.2
Emission Control Equipment	The source utilizes various rotoclones, baghouses, drop-out boxes, filters, mist eliminators, for the emission units (Section 7.2.1 and 7.2.2)
Applicable Rules and Requirements	
Emission Standards	• 35 IAC 212.321(a) and 35 IAC 212.322(a): General PM process limits • 35 IAC 219.301: General volatile organic material (VOM) process limit • 35 IAC 214.301: General SO2 process limit • 35 IAC 214.303 (#9 Cleaning Line (CT-17)): Excluding fuel combustion emission units, similar emission units at a source using H2SO4 are limited to less than "45.4 grams in any one hour period for sulfuric acid usage less than 1180 Mg/yr (100 percent acid basis) (0.10 lbs/hr up to 1300 T/yr)" • 35 IAC 212.307 and 212.213: Reiterates the operating program requirements in Condition 5.3.3.
Streamlining	• Not Applicable

Title I Conditions	• The draft permit contains revised limits on operation and emissions in 7.2.6(a) for the Slab Furnace Operations (SF-1, SF-2, SF-3). These limits were incorporated from Permit 98090026. Changes to the previous Title 1 limits are as follows: o Reduction in previous emission limits based upon the revised emission factors shown in Tables 1.4.1 and 1.4.2, AP-42, Volume I, Supplement D, March, 1998. (See Condition 7.2.12) • The draft permit contains revised limits on operation and emissions in 7.2.6(b) for the Hot Mill. These limits were incorporated from Permit 98040084. Changes to the previous Ti1 limit are as follows: o Reduction in previous emission limits based upon the reduction in surface area per ton of metal processed. • The draft permit contains limits on operation and emissions in 7.2.6(c) for the #2 and #3 Coil Millers. These limits were incorporated from Permit 00080019.
Title I Conditions (Continued)	• The draft permit contains limits on operation and emissions in 7.2.6(d) for 4-Stand Tandem Mill. These limits were incorporated from Permit 93010016. • The draft permit contains limits on operation and emissions in 7.2.6(e) for the #29 Rolling Mill With Mist Eliminator. These limits were incorporated from Permit 01010072. • The draft permit contains limits on operation and emissions in 7.2.6(f) for Bell Anneal process emission units. These limits were incorporated from Permit 07010037. • The draft permit contains limits on operation and emissions in 7.2.6(g) for #4 Strip Anneal. These limits were incorporated from Permit 03030083. • The draft permit contains limits on operation and emissions in 7.2.6(h) for #1 Posit Bond Brushing Machine (BM-1). These limits were incorporated from Permit 98120051. • The draft permit contains limits on operation and emissions in 7.2.6(i) for 2 Posit Bond Brushing Machine (BM-2). These limits were incorporated from Permit 99070007. • The draft permit contains limits on operation and emissions in 7.2.6(j) for Hot Dip Tin Line (HD-1). These limits were incorporated from Permit 04120083. • The draft permit contains limits on operation and emissions in 7.2.6(k) for #9 Cleaning Line. These limits were incorporated from Permit 93080004 • It should be noted that the #1 & #2 Horizontal Casters Inline Miller Skimmers (SM-2 & SM-3) and the strip anneal for the #2 Horizontal Casting Unit (See Permit # 04020062) has limitations established in Condition 7.1.6(b) of the draft permit.

Non-applicability	• 35 IAC 217.121& 35 IAC 216.121: #1 to #3 Slab Furnaces; Hot Mill; and #7, #9, #11 to #13, and #31 Bell Anneals are not by definition a fuel combustion emission unit (See 35 IAC 211.2470) • NSPS for Standards of Performance for Secondary Brass and Bronze Production Plants, 40 CFR 60 Subparts A and M: As per the applicability criteria for the NSPS, i.e., 40 CFR 60.130
Periodic Monitoring (other than basic regulatory requirements)	
Testing	None
Emissions Monitoring	None
Operational Monitoring	Part of the recordkeeping and compliance procedures requirements in Conditions 7.2.9 and 7.2.12 of the draft permit, respectively • Differential Pressure Monitoring • Monthly Operational Inspections • Visible Emission Observations • Broken Bag Observations See Attachment 5 (Pressure Drop Monitoring Schedule and Visible Emission Compliance Demonstration) of the draft Permit.
Inspections	None
Recordkeeping	• Hot Mill Operations o Throughput, Hours of operation. And Emissions. • Coil miller #2 and #3 o Throughput, Hours of operation. And Emissions. • Bell Anneal Operations : o Process rate, Calculated emission factor, And Emissions. • Posit Bond Brushing Machines (BM-1 & BM-2): o Records of inspection and repairs And Emissions. • #29 rolling mill with mist eliminator: o Throughput, Maintenance log And Emissions. • Fuel Combustion Records o Throughput, Burner Capacity And Emissions. • Hot Dip Tin Line o Throughput; inspection, maintenance, and repairs logs; And Emissions. • Air Pollution Control Equipment: o Baghouse pressure monitoring, visible emission observations, and operational inspections required in Condition 7.2.8 with a log of all repairs and corrective actions. • All other equipment o Throughput And Emissions.

Other	None
Reporting	
Prompt Reporting	Report within 30 days • Attachment 3
Other Reporting	None
Other Information	
Footnotes	None

Table 3 (Section 7.3 of the draft permit)

Emission Unit	
Name	Unit 03: Ammunition Operations
Description	Multiple emission units associated with ammunition manufacturing processes. (See the descriptions in Section 7.3.1 and 7.3.2)
Date Constructed	Dates of Construction are listed in Section 7.3.2.
Emission Control Equipment	The source utilizes various rotoclones, baghouses, wet separators, and filters for the emission units (Section 7.3.1 and 7.3.2)
Applicable Rules and Requirements	
Emission Standards	• 35 IAC 212.321(a) and 35 IAC 212.322(a): General PM process limits • 35 IAC 219.301: General volatile organic material (VOM) process limit • 35 IAC 214.301: General SO2 process limit • 35 IAC 214.303 Olin Propellant Treatment Process (OPTP-1)): Excluding fuel combustion emission units, similar emission units at a source using H2SO4 are limited to less than "45.4 grams in any one hour period for sulfuric acid usage less than 1180 Mg/yr (100 percent acid basis) (0.10 lbs/hr up to 1300 T/yr)" • 35 IAC 217.301(a) and (b): NOx limit for nitric acid processes • 35 IAC 212.307 and 212.213: Reiterates the operating program requirements in Condition 5.3.3.
Streamlining	Not Applicable

Title I Conditions	• The draft permit contains limits on operation and emissions in 7.3.6(a) for the Lower Billet Melt Kettle Permit. These limits were incorporated from Permit 97120071. • The draft permit contains limits on operation and emissions in 7.3.6(b) for the MRF Hammermills stages 1, 2 and 3. These limits were incorporated from Permit 03010028. • The draft permit contains limits on operation and emissions in 7.3.6(c) for the Building 7 Cobmeal Collection System. These limits were incorporated from Permit 98120002. • The draft permit contains limits on operation and emissions in 7.3.6(d) for the MRF Rotary Destruct System with Baghouse. These limits were incorporated from Permit 97100026. • The draft permit contains limits on operation and emissions in 7.3.6(e) for the OPTP Reactor Vessel Permit. These limits were incorporated from Permit 00080073. • The draft permit contains limits on operation and emissions in 7.3.6(f) for the Shotshell Cut-Off Firing Machine (SSCOFM-1) with 2-stage filter (2-SF). These limits were incorporated from Permit 02050092.
Non-applicability	• 40 CFR 60 Subpart R - Standards of Performance for Primary Lead Smelters; 40 CFR 60 Subpart L – Standards of Performance for Secondary Lead Smelters; 40 CFR 63 Subpart X - National Emission Standards For Hazardous Air Pollutants From Secondary Lead Smelting; and 40 CFR 63 Subpart TTT - National Emission Standards for Hazardous Air Pollutants for Primary Lead Smelting: Lead melting emission units do not meet the definition for lead smelting. • 35 IAC 219: Nitration tank (T-2) and spent acid storage tank (T-3) do not store organic material. • See Condition 7.3.5
Periodic Monitoring (other than basic regulatory requirements)	
Testing	None
Emissions Monitoring	None
Operational Monitoring	Part of the recordkeeping and compliance procedures requirements in Conditions 7.2.9 and 7.2.12 of the draft permit, respectively • Differential Pressure Monitoring • Monthly Operational Inspections • Visible Emission Observations • Broken Bag Observations See Attachment 5 (Pressure Drop Monitoring Schedule and Visible Emission Compliance Demonstration) of the draft Permit.

Inspections	None

Recordkeeping	• As applicable, hours of operation
	• Lower Billet Melt Kettle
	  o Throughput and Hours of Operation
	• Nitration Tank (T-2) and Spent Acid Storage Tank (T-3)::
	  o Throughput, Production Record, and Emissions.
	• MRF Hammermills stages 1, 2 and 3
	  o Throughput, Hours of Operation and Emissions.
	• OPTP Reactor Vessel
	  o Throughput, Production Record, and Emissions.
	• Shotshell Cut-Off Firing Machine (SSCOFM-1) with 2-stage filter (2-SF)
	  o Hours of operation; inspection, maintenance, and repairs logs; And Emissions.
	• Fuel Combustion Records
	  o Throughput, Burner Capacity And Emissions.
	• Air Pollution Control Equipment:
	  o Baghouse pressure monitoring, visible emission observations, and operational inspections required in Condition 7.2.8 with a log of all repairs and corrective actions.

Other	None
Reporting	
Prompt Reporting	Report within 30 days • Attachment 3 • Nitration Tank (T-2): Five Day Reporting
Other Reporting	None
Other Information	
Footnotes	None

Table 4 (Section 7.4 of the draft permit)

Emission Unit	
Name	Unit 04: Subpart F Sources
Description	Multiple emission units subject to 35 IAC 219 Subpart F. (See the descriptions in Section 7.4.1 and 7.4.2)
Date Constructed	Dates of Construction are listed in Section 7.4.2.
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	• 35 IAC 219 Subpart F: Coating Operations o Miscellaneous Metal Parts and Products Coating/Clear Coating [35 IAC 219.204(j)(1) o Miscellaneous Metal Parts and Products Coating/Extreme Performance Coating Air Dried [35 IAC 219.204(j)(2)(A)]
Streamlining	None
Title I Conditions	• The draft permit contains revised limits on operation and emissions in 7.4.6(a) for the Manurhin Case Mouth Sealant Line (CSML-1). These limits were incorporated from Permit 99020096. Changes to the previous Title 1 limits are as follows: o Coating usage limitations were added to the above in order to allow for enforcement of the emissions limitation (See Condition 7.4.6(a)(ii)). • The draft permit contains revised limits on operation and emissions in 7.4.6(b) for the 5.56 Short Range Training Ammunition coating. These limits were incorporated from Permit 05030067. Changes to the previous Title 1 limits are as follows: o Coating usage limitations were added to the above in order to allow for enforcement of the emissions limitation (See Condition 7.4.6(b)(i)(B)) • The draft permit contains limits on operation and emissions in 7.4.6(c) for 49 Cappers (CAP-1 to CAP -49). These limits were incorporated from Permit 07020049 • Reiterates and references HAP limitations in Condition 5.6.3

Non-applicability	• 35 IAC 219.301 or 219.302, Use of Organic Material: Subject to 35 IAC 219 Subpart F: Coating Operations • 35 IAC 219 Subpart TT: Subject to 35 IAC 219 Subpart F: Coating Operations (See 35 IAC 219.980(a))
Periodic Monitoring (other than basic regulatory requirements)	
Testing	• The VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 to establish the records required under 35 IAC 218.211: [35 IAC 219.105(a), 219.211(a), and Section 39.5(7)(b) of the Act] • HAP testing required as per Condition 5.7.2
Emissions Monitoring	None
Operational Monitoring	None
Inspections	None
Recordkeeping	• of VOM content testing results (Condition 7.4.7) • 35 IAC 219.211(c)(2) o Name and identification number of each coating; and o Weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM). • Substrate material coated • Records of the coating usage • VOM and HAP content of coatings and solvents, % by Wt • Density of coatings, lb/gal • Records of the solvent usage • Density of solvent • Monthly and annual VOM and HAP emissions
Other	None
Reporting	
Prompt Reporting	Report within 30 days • Attachment 3 • 35 IAC 219.211(c)(3)(A)
Other Reporting	None
Operational Flexibility	Usage of coatings, thinners, or cleaning solvents with various VOM and HAP contents (Condition 7.4.11)
Other Information	

Footnotes	None

Table 5 (Section 7.5 of the draft permit)

Emission Unit	
Name	Unit 5 – Cold Cleaning/Degreasing
Description	Posit Bond Brushing Cleaner (See Condition 7.5.1 and 7.5.2).
Date Constructed	Constructed: May 1996 Modified: August 1999
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	• 35 IAC 219.182: Cold cleaning • 35 IAC 219.301: General volatile organic material (VOM) process limit
Streamlining	None
Title I Conditions	• The draft permit contains limits on operation and emissions in Conditions 7.5.6(a). These limits were incorporated from Permit 99070007 • The draft permit contains limits on solvents used in the affected emission unit in Conditions 7.5.6(b), in order to avoid applicability of 40 CFR Part 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning (See Condition 7.5.4(a)) • The draft permit contains limits on heating the solvent and solvent vapor pressure in the affected emission unit in Conditions 7.5.6(c), in order to avoid applicability of 35 IAC 219.182(b)(3) and 219.182(c)(4). (See Condition 7.5.4(c))
Non-applicability	• 40 CFR Part 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning: Applicability criteria shown in 40 CFR 63.460. (See solvent usage limit Condition 7.5.4(b)) • 35 IAC 219 Subpart TT: Subject to 35 IAC 219 Subpart E: Solvent Cleaning. [35 IAC 219.980(a)] • 35 IAC 219.182(b)(3) and 219.182(c)(4): Limits on solvent vapor pressure and prohibition against solvent heating. (See Condition 7.5.6(c))
Periodic Monitoring (other than basic regulatory requirements)	
Testing	Compliance with 35 IAC 219 Subpart E: Solvent Cleaning - 35 IAC 219.186
Emissions Monitoring	None
Operational Monitoring	None

Inspections	None
Recordkeeping	• 35 IAC 219.182 - Cold Cleaning: [35 IAC 219.182(d)] • General Records o Solvent usage and recovered, lb/mo and lb/yr; o Operating schedule (i.e., number of cycles per month and per year); and o Monthly and annual aggregate VOM and HAP emissions; and o Certified Product Data Sheet (CPDS) or Material Safety Data Sheets (MSDS) for the solvents used.
Other	None
Reporting	
Prompt Reporting	Report within 30 days • Attachment 3 • 35 IAC 219.182(d)(5) & (6)
Other Reporting	None
Other Information	
Footnotes	None

Table 6 (Section 7.6 of the draft permit)

Emission Unit	
Name	Unit 06: Other VOM Emission Units
Description	Multiple emission units which as a group meets the applicability criteria in 35 IAC 219 Subpart TT: Other Emission Units (35 IAC 219.980(a)) but which is excluded from being applicable to the subpart under 35 IAC 219.980(a)(2). (See the descriptions in Section 7.6.1 through 7.6.3)
Date Constructed	Dates of Construction are listed in Section 7.6.2.
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	• 35 IAC 219.301: General volatile organic material (VOM) process limit
Streamlining	None

Title I Conditions	• The draft permit contains limits on operation and emissions in Conditions 7.6.6(a) and (c). These limits were incorporated from Permit 07020050, 93050056 and 99030110. [T1] • The draft permit contains new limits on operation and emissions in Conditions 7.6.6(b). [T1N] • The above referenced limits ensure that the affected emission units are not subject to the control requirements of 35 IAC Part 219, Subpart TT.
Non-applicability	• 35 IAC 219 Subpart TT: Other Emission Units: Excluded pursuant to Conditions 7.6.3(b) and 7.6.6 [35 IAC 219.980(a) & (d)] • 40 CFR 60 Subpart TT - Standards of Performance for Metal Coil Surface Coating: Applicability criteria shown in 40 CFR 60.460(a)
Periodic Monitoring (other than basic regulatory requirements)	
Testing	VOM content: 35 IAC 219.105(a), 219.211(a), and Section 39.5(7)(b) of the Act
Emissions Monitoring	None
Operational Monitoring	None
Inspections	None
Recordkeeping	• Test results for VOM and HAP content of each coating, lubricant or solvent: Section 39.5(7)(e) of the Act • Name and identification number, weight of VOM (lb/gal), and HAP per volume of each coating, lubricant or solvent: 35 IAC 219.211(c)(2) • General Records: o Material Usage; o Waste solvent content of waste materials (i.e., waste lubricants, solvents, cobmeal,…etc.); and o Monthly and annual aggregate VOM and HAP emissions.
Other	None
Reporting	
Prompt Reporting	Report within 30 days • Attachment 3 • 35 IAC 219 Subparts TT Exclusion: 35 IAC 219.990
Other Reporting	None
Operational Flexibility	Usage of sealants, marking paints, lubricants, thinners, or cleaning solvents with various VOM and HAP contents (Condition 7.6.11)

Other Information	
Footnotes	None

Table 7 (Section 7.7 of the draft permit)

Emission Unit	
Name	Unit 07: Chrome Plating Line
Description	There are four chrome plating tanks identified at the facility. Chrome plating tanks 1 and 2 (PT-3) are located within a single tank and each has a 12-volt DC rectifier with a maximum output of 500 amperes. Chrome plating tanks 3 and 4 (PT-2 and PT-1) each have a single 12-volt DC rectifier with a maximum output of 500 amperes. The maximum total output for the four rectifiers is 2,000 amperes. A chemical fume suppressant containing a wetting agent is used to keep the surface tension of the electroplating baths from exceeding 45 dynes per centimeter at any time during operation of the plating tanks.
Date Constructed	Nov. 1982
Emission Control Equipment	None (Chemical Fume Suppressant containing a wetting agent is used to achieve compliance)
Applicable Rules and Requirements	
Emission Standards	• 40 CFR, Part 63, Subparts A and N - National Emission Standards For Chromium Emissions From Hard And Decorative Chromium Electroplating And Chromium Anodizing Tanks: • 35 IAC 212.321(a): General PM process limit
Streamlining	None
Title I Conditions	None
Non-applicability	None
Periodic Monitoring (other than basic regulatory requirements)	
Testing	40 CFR 63 Subpart N: National Emission Standards For Chromium Emissions From Hard And Decorative Chromium Electroplating And Chromium Anodizing Tanks: 40 CFR 63.344(c) and (d)
Emissions Monitoring	None
Operational Monitoring	40 CFR 63 Subpart N: National Emission Standards For Chromium Emissions From Hard And Decorative Chromium Electroplating And Chromium Anodizing Tanks: 40 CFR 63.343(c)

Inspections	None
Recordkeeping	• 40 CFR 63 Subpart N: National Emission Standards For Chromium Emissions From Hard And Decorative Chromium Electroplating And Chromium Anodizing Tanks: 40 CFR 63.346 • General Records o Process operating time; o Date and time that fume suppressant wetting agents were added to the bath; and o Bath components purchased, with the wetting agent clearly identified as a bath constituent contained in one of the components.
Other	None
Reporting	
Prompt Reporting	Attachment 3
Other Reporting	• 40 CFR 63 Subpart N: National Emission Standards For Chromium Emissions From Hard And Decorative Chromium Electroplating And Chromium Anodizing Tanks: 40 CFR 63.347 and in the General Provisions to 40 CFR part 63, according to the applicability of 40 CFR 63 Subpart A as identified in Table 1 of 40 CFR 63 Subpart
Other Information	
Footnotes	None

Table 8 (Section 7.8 of the draft permit)

Emission Unit	
Name	Unit 08: Utility Operations
Description	Multiple emission units which provide utility services for the source. These include the Propane Plant & Vaporizer Flare; Limestone Silos (wastewater treatment) and Package Boilers. (See the descriptions in Section 7.8.1 through 7.8.2)
Date Constructed	Dates of Construction are listed in Section 7.8.2.
Emission Control Equipment	The Limestone silos (S-1,S-2) are equipped with Filters (FF-1, FF-2).
Applicable Rules and Requirements	
Emission Standards	• Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc: Boiler B-6 (Added in 1995) meets the applicability criteria under 40 CFR 60.40c(a); • 35 IAC 212.206: Particulate matter (PM) into the atmosphere in any one hour period shall not exceed 0.15 kg/MW-hr (0.10 lb/mmBtu) of actual heat input from any fuel combustion emission unit. • 35 IAC 216.121: Carbon monoxide (CO) into the atmosphere from any Package Boiler with actual heat input greater than 2.9 MW (10 mmBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air • Sulfur dioxide (SO_2) o 35 IAC 214.161(b): Boilers burning distillate fuel oil, SO2 emissions limited to less than 0.3 lb/mmBtu. o 40 CFR 60 Subpart Dc: For Package Boiler B-6 burning distillate fuel oil, SO_2 emissions limited to less than 0.5 lb/mmBtu or as an alternative the fuel is limited to less than 0.5 weight percent sulfur. All limits shall be based on a 30-day rolling average. [40 CFR 60.42c(d) and (g)] As indicated in the permit, the limitations in 35 IAC 214.161(b) supersedes the 40 CFR 60 Subpart Dc requirements since 35 IAC 214.161(b) is more stringent than the 40 CFR 60 Subpart Dc, (See Condition 7.8.6(a)).

Emission Standards (Continued)	• Opacity o 35 IAC 212.123(a): excluding Package Boiler B-6, opacity limited to less than 30 percent (See Condition 5.3.2(b)). o 40 CFR 60 Subpart Dc (40 CFR 60.42c(c) and (d)): opacity limited to less than 20 percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. As indicated in the permit, for the Package Boiler B-6, opacity limitations in 40 CFR 60 Subpart Dc (40 CFR 60.42c(c) and (d)) supersedes the 35 IAC 212.123(a) requirements since 40 CFR 60 Subpart Dc is more stringent than the 35 IAC 212.123(a), (See Condition 7.8.6(a)(iii)). • 35 IAC 219.301: General volatile organic material (VOM) process limit (Propane Plant & Vaporizer Flare and Limestone Silos) • 35 IAC 212.321(a): General PM process limit (Propane Plant & Vaporizer Flare and Limestone Silos)
Streamlining	None
Title I Conditions	• Package Boilers: The draft permit contains revised limits on operation and emissions in Conditions 7.8.6(b) for the Package Boilers. These limits were incorporated from Permit 85100062. Changes to the previous Title 1 limits are as follows: o These limits allow the use of natural gas equivalent propane-air mixture as fuel in the boilers with no corresponding increase in emissions. Additional limitations regarding source wide combustion limitations have been added in Condition 5.6.4. • Propane Plant & Vaporizer Flare: The draft permit contains new Title 1 limits on operation and emissions in Conditions 7.1.6(c) for the Propane Plant & Vaporizer Flare. The above referenced limits ensure that the affected emission units are not subject to MSSCAM and/or PSD.
Non-applicability	• 35 IAC 212.122 (Opacity limit): Boiler capacities are less than 250 mmBtu/hr and the Propane Plant & Vaporizer Flare and Limestone Silos are not by definition a fuel combustion emission units (See 35 IAC 211.2470); • 35 IAC 214.122 (SO_2 limitations): Propane plant vaporizer flare (FL-1) and burnoff flare do not burn solid fuel or liquid fuel; • 35 IAC 217.141 (NO_x): Boiler capacities are less than 250 mmBtu/hr and the Propane Plant & Vaporizer Flare and Limestone Silos are not by definition a fuel combustion emission units (See 35 IAC 211.2470); • 35 IAC 219.301 (VOM limit): Pursuant to 35 IAC 219.303, fuel combustion emission units, i.e., the boilers are excluded from applicability from 35 IAC 219.301.
Periodic Monitoring (other than basic regulatory requirements)	
Testing	None

Emissions Monitoring	None
Operational Monitoring	None
Inspections	None
Recordkeeping	• Fuel Usage • Emissions • Distillate Fuel Oil Sulfur Content
Other	None
Reporting	
Prompt Reporting	Attachment 3
Other Reporting	40 CFR 60 Subpart Dc
Other Information	
Footnotes	None

Table 9 (Section 7.9 of the draft permit)

Emission Unit	
Name	Unit 09: Gasoline Tanks
Description	The small gasoline storage tanks are used to dispense gasoline to plant vehicles.
Date Constructed	Dates of Construction are listed in Section 7.9.2.
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	• 35 IAC 219.122(b): Tanks having a storage capacity of greater than 946 liter (250 gallon) are required to be equipped with a permanent submerged loading pipe; • 35 IAC 219.583(a)(1): Tanks used for gasoline dispensing operations are required to be equipped with a submerged loading pipe
Streamlining	None
Title I Conditions	None
Non-applicability	• 35 IAC 219.121 & 35 IAC 219.122(a): Tank capacity of each tank is less than 40,000 gal • 35 IAC 219.583(a)(2) and (3): Tank capacity of each tank is less than 575 gal. [35 IAC 219.583(b)] • 35 IAC 219 Subpart TT: Tanks are to 35 IAC 219 Subparts B (Organic Emissions from Storage and Loading Operations) and Y (Gasoline Distribution). [35 IAC 219.980(a)]
Periodic Monitoring (other than basic regulatory requirements)	
Testing	None
Emissions Monitoring	None
Operational Monitoring	None
Inspections	None

Recordkeeping	• Tank capacity and submerged loading pipe design; • Maintenance and repair records; • Gasoline Throughput; and • Tank Emissions
Other	None
Reporting	
Prompt Reporting	Attachment 3
Other Reporting	None
Operational Flexibility	• Changes to components related to either the “submerged loading pipe or submerged fill”, including addition of new components and repair and replacement of components; and • Changes in the material stored in a tank provided the tank continue to comply with the Conditions 7.9.5 of this permit.
Other Information	
Footnotes	None

Table 10 (Section 7.10 of the draft permit)

Emission Unit	
Name	Unit 10 - Fugitive emissions
Description	Fugitive emissions are defined as those emissions, which would not reasonably pass through a stack, vent or other functionally equivalent opening. Emissions are generated from the operations shown in Condition 7.10.2
Date Constructed	Not Applicable
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	• 35 IAC 212.301 and 212.314: General limitation requires that there be no visible fugitive particulate matter emissions be observed beyond the sources property line. (See Section 5.3.2(a)). • 35 IAC 212.302(a): Fugitive particulate matter requirements set in 35 IAC Sections 212.304 through 212.310 and 212.312. Operating program required (See Section 5.3.3) • 35 IAC 212.321(a): General PM process limit (Contact cooling towers and Casting Fugitives)
Streamlining	None
Title I Conditions	None
Non-applicability	• 35 IAC 212.321(a): (Emissions of Particulate Matter from Process Emission Units): The fugitive road emission sources are not considered to be a process emissions unit and because material storage piles are considered to be unique process in which the rules cannot reasonably be applied. • 35 IAC 212.304: Fugitive particulate matter from all storage piles; conveyor loading operations to the piles; and the normal traffic pattern access areas surrounding the piles at the source are less than 50 tons/year.
Periodic Monitoring (other than basic regulatory requirements)	
Testing	None
Emissions Monitoring	None

Operational Monitoring	Visible Emission Observations: See Condition 7.10.8 and Attachment 5 of the permit
Inspections	None
Recordkeeping	• Paved and unpaved roads (VMT/mo, VMT/yr)*; • Storage pile activity (T/mo, T/yr)*; • Cooling tower flow rate (gallons/mo, gallons/yr)*; • Emissions • Visible emission observations
Other	None
Reporting	
Prompt Reporting	Attachment 3
Other Reporting	None
Other Information	
Footnotes	None

ATTACHMENT 3: Prompt Reporting of Deviations

Prompt reporting of deviations is critical in order to have timely notice of deviations and the opportunity to respond, if necessary. The effectiveness of the permit depends upon, among other important elements, timely and accurate reporting. The Illinois EPA, USEPA and the public rely on timely and accurate reports submitted by the permittee to measure compliance and to direct investigation and follow-up activities. Prompt reporting is evidence of a permittee's good faith in disclosing deviations and describing the steps taken to return to compliance and prevent similar incidents.

Any occurrence that results in an excursion from any emission limitation, operating condition, or work practice standard as specified in this CAAPP permit is a deviation subject to prompt reporting. Additionally, any failure to comply with any permit term or condition is a deviation of that permit term or condition and must be reported to the Illinois EPA as a permit deviation. The deviation may or may not be a violation of an emission limitation or standard. A permit deviation can exist even though other indicators of compliance suggest that no emissions violation or exceedance has occurred. Reporting permit deviations does not necessarily result in enforcement action. The Illinois EPA has the discretion to take enforcement action for permit deviations that may or may not constitute an emission limitation or standard or the like, as necessary and appropriate.

Section 39.5(7)(f)(ii) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(B), requires prompt reporting of deviations from the permit requirements. The

permitting authority (in this case, Illinois EPA) has the discretion to define "prompt" in relation to the degree and type of deviation likely to occur. Furthermore, Section 39.5(7)(f)(i) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(A) requires that monitoring reports must be submitted at least every 6 months. Therefore, USEPA generally considers anything less than 6 months to be "prompt" as long as the selected time frame is justified appropriately (60 Fed. Reg. 36083, 36086 (July 13, 1995)).

The USEPA has stated that, for purposes of administrative efficiency and clarity, it is acceptable to define prompt in each individual permit. *Id.* The Illinois EPA has elected to follow this approach and defines prompt reporting on a permit by permit basis. In instances where the underlying applicable requirement contains "prompt" reporting, this frequency or a shorter frequency of reporting is the required timeframe used in this permit. Where the underlying applicable requirement fails to explicitly set forth the timeframe for reporting deviations, the Illinois EPA has developed a structured manner to determine the reporting approach used in this permit.

The Illinois EPA generally uses a time frame of 30 days to define prompt reporting of most deviations. Also, for certain permit conditions in individual permits, the Illinois EPA may require an alternate timeframe that is less than 30 days if the permit requirement justifies a shorter reporting time period. Under certain circumstances, EPA may establish a deviation reporting period longer than 30 days, but, in no event exceeding 6 months. Where it has established a deviation reporting period other than 30 days in an individual permit (specifically Section 7.x.10), the Illinois EPA has explained the reason for the alternative timeframe. (See Attachment 2 of this Project Summary.)

The timing for certain deviation reporting may be different when a source or emission unit at a source warrants reporting to address operation, independent of the occurrence of any deviations. This is the case for a source that is required to perform continuous monitoring for the emission unit, for which quarterly or semi-annual "monitoring" reports are appropriate. Where appropriate, reporting of deviations has generally been combined in, or coordinated with these quarterly or semi-annual reports, so that the overall performance of the plant can be reviewed in a comprehensive fashion. This will allow a more effective and efficient review of the overall performance of the source by the Illinois EPA and other interested parties, as well as by the source itself.

At the same time, there are certain deviations for which quicker reporting is appropriate. These are deviations for which individual attention or concern may be warranted by the Illinois EPA, USEPA, and other interested parties. Under this scenario, emphasis has been placed primarily on deviations that could represent substantial violations of applicable emission standards or lapses in control measures at the source. For these purposes, depending on the deviation, immediate notification may be required and preceded by a follow-up report submitted within 15 days, during which time the source may further assess the deviation and prepare its detailed plan of corrective action.

In determining the timeframe for prompt reporting, the Illinois EPA assesses a variety of criteria such as:

- historical ability to remain in continued compliance,
- level of public interest in a specific pollutant and/or source,
- seriousness of the deviation and potential to cause harm,
- importance of applicable requirement to achieving environmental goals,
- designation of the area (i.e., non-attainment or attainment),
- consistency among industry type and category,
- frequency of required continuous monitoring reports (i.e., quarterly),
- type of monitoring (inspection, emissions, operational, etc.), and
- air pollution control device type and operation

These prompt reporting decisions reflect the Illinois EPA's consideration of the possible nature of deviations by different emission units and the responses that might be required or taken for those different types of deviations. As a consequence, the conditions for different emission units may identify types of deviations which include but are not limited to: 1) Immediate (or very quick) notification; 2) Notification within 30 days as the standard; or 3) Notification with regular quarterly or semi-annual monitoring reports.

The Illinois EPA's decision to use the above stated prompt reporting approach for deviations as it pertains to establishing a shorter timeframe in certain circumstances reflects the criteria discussed as well as USEPA guidance on the topic.

- 40 CFR 71.6(a)(3)(iii)(B) specifies that certain potentially serious deviations must be reported within 24 or 48 hours, but provides for semi-annual reporting of other deviations. (Serious or severe consequences)
- FR Vol. 60, No. 134, July 13, 1995, pg. 36086 states that prompt should generally be defined as requiring reporting within two to ten days of the deviation, but longer time periods may be acceptable for a source with a low level of excess emissions. (intermediate consequences)
- Policy Statement typically referred to as the "Audit Policy" published by the USEPA defines prompt disclosure to be within 21 days of discovery. (Standard for most "pollutant limiting" related conditions)
- Responses to various States by USEPA regarding other States' definition of prompt.

As a result, the Illinois EPA's approach to prompt reporting for deviations as discussed herein is consistent with the requirements of 39.5(7)(f)(ii) of the Act as well as 40 CFR part 70 and the CAA. This reporting arrangement is designed so that the source will appropriately notify the Illinois EPA of those events that might warrant individual attention. The timing for these event-specific notifications is necessary and appropriate as it gives the source enough time to conduct a thorough investigation into the causes of an event, collecting any necessary data, and to develop preventative measures, to reduce the likelihood of similar events, all of which must be addressed in the notification for the deviation.

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