

11/16/2017

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

IN THE MATTER OF:

**General Iron Industries, Inc.**  
1909 N. Clifton Avenue,  
Chicago, Illinois 60614

ATTENTION:

**Jim Kallas**  
Plant Environmental Engineer

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring General Iron Industries, Inc. (General Iron) to submit certain information about the facility at 1909 N. Clifton Avenue, Chicago Illinois. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit relating to emissions testing we are requiring you to complete, including the submittal of a test protocol, notification of intent to test, and the completion of a testing report. Appendix C specifies the information that you must submit relating to various permits and operating information. You must send this information to us according to the schedules contained in each appendix.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

11/05/01/11

General Iron owns and operates an emission source at the Chicago, Illinois facility. We are requesting this information to determine whether your emission source is complying with the Illinois State Implementation Plan.

General Iron must send all required information to:

Attn: Compliance Tracker, AE-18J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

General Iron must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix D, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix D

provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

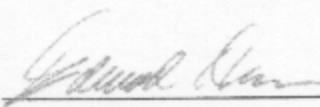
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject General Iron to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Scott Connolly at 312-886-1493 or at [connolly.scott@epa.gov](mailto:connolly.scott@epa.gov).

Date

11/14/17

  
Edward Nam  
Director  
Air and Radiation Division



## Appendix A

When providing the information requested in Appendices B and C, use the following instructions and definitions.

### Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix C.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix D for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

#### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

## Appendix B

### Information You Are Required to Submit to EPA: Emissions Testing

General Iron Industries (General Iron) must respond to this information request by performing testing at its facility in Chicago, Illinois ("the facility") pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a). General Iron must submit a test plan, conduct testing, and submit all other information requested in accordance with the schedule specified below:

|                                |  |
|--------------------------------|--|
| Submit testing Protocol(s)     | Not less than 45 days before testing       |
| Notification of Intent to Test | Not less than 21 days before testing       |
| Complete testing               | Within 180 days of receipt of this request |
| Submit Testing Report          | Within 30 days of completion of testing    |

1. Within one hundred and eighty (180) calendar days after receipt of this request, General Iron must perform emission testing at the facility to determine:
  - a. The total gaseous organic compound emission rate as volatile organic compounds (VOC) of the hammermill shredder using EPA Reference Methods 1-4 and Method 25A. Methane and ethane concentrations shall be determined using Method 18 and subtracted from the total hydrocarbon concentration measured following Method 25A to determine VOC concentrations;
  - b. Particulate Matter emission rate using EPA Reference Methods 1-4 and Method 5; and
  - c. Metals emission rates of the hammermill shredder using EPA Reference Methods 1-4 and Method 29.
2. During the testing conducted pursuant to Item 1, General Iron shall monitor and record the operating parameters of the shredder, including metal feed rate, water flow rates, shredder amperage and autos and non-auto material shredded per run.
3. During all emission testing, General Iron shall operate under representative conditions.
4. Not less than forty-five (45) calendar days prior to the planned test(s), General Iron shall submit to EPA a proposed testing protocol that completely describes the methods and procedures for testing at each unit, including all relevant operating parameters. The protocol shall state:
  - a. the proposed level of production during emission testing, as well as
  - b. the maximum and average production rates at processes associated with each emission point; and
  - c. shall state what procedures will be utilized to minimize unmeasured emissions.
5. General Iron shall conduct the testing under a protocol approved, in advance, by EPA. General Iron shall submit the protocol via e-mail to [connolly.scott@epa.gov](mailto:connolly.scott@epa.gov). EPA will provide approval or comments on the testing protocol via e-mail.



6. At least twenty-one (21) calendar days prior to the planned test(s), General Iron shall submit notification to EPA of its intent to perform emission testing. General Iron shall submit this notice via e-mail to [connolly.scott@epa.gov](mailto:connolly.scott@epa.gov).
7. Within thirty (30) calendar days after the completion of the test(s), General Iron shall submit a complete report of the emissions testing, including, at minimum, the following:
  - a. Summary of Results
    - i. results of the above-specified emission test(s);
    - ii. process and control equipment data recorded during the test(s);
    - iii. discussion of any errors that occurred during testing;
    - iv. discussion of any deviations from the reference test methods or other problems encountered during the test; and
    - v. data on production rate during testing.
  - b. Facility Operations
    - i. description of the process and control equipment in operation during the test(s);
    - ii. operating parameters of any control equipment in operation during the test(s); and
    - iii. facility operating parameters and data, including an explanation of how the operating parameters demonstrate that the process units were operating at greater than 95% production capacity at the time of the test.
  - c. Sampling and Analytical Procedures
    - i. sampling port location(s) and dimensions of cross-section;
    - ii. sampling point description, including labeling system;
    - iii. brief description of sampling procedures, including equipment and diagram;
    - iv. description of sampling procedures (planned or accidental) that deviated from any standard method;
    - v. brief description of analytical procedures, including calibration;
    - vi. description of analytical procedures (planned or accidental that deviated from any standard method; and
    - vii. quality control/quality assurance procedures, tests, and results.
  - d. Appendix
    - i. complete results with example calculations;
    - ii. raw field data;
    - iii. laboratory report, with signed chain-of-custody forms;
    - iv. calibration procedures and results;
    - v. raw process and equipment data, signed by a plant representative;
    - vi. test log(s); and
    - vii. project participants and titles.

## Appendix C

### Information You Are Required to Submit to EPA: Permits and Operations

General Iron must submit the following information about its facility in Chicago, Illinois, pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) within 30 days of receipt of this request.

1. Provide all construction permits, operating permits and permit applications submitted, received or in use since July 1, 2010.
2. Provide copies of the Operating Program, maintained pursuant to 35 Ill. Adm. Code 212.309, and all revisions, used at the facility since July 1, 2012.
3. Provide copies of all annual emissions reports submitted to the Illinois Environmental Protection Agency from January 1, 2012 to the present.
4. Provide in Microsoft Excel compatible format monthly records of shredder throughput (tons/month) since July 1, 2012. Separate throughput by total tons, light iron (ferrous), and non-ferrous, include amount of auto bodies shredded, in tons.
5. Provide shredder operating hours per day for each day from July 1, 2012 to the present. If no operations were conducted, state why there were no operations.
6. Provide facility documents discussing volatile organic compound (VOC) emissions from the shredder since July 1, 2010. Include emissions calculations, applicability studies and correspondence.



CERTIFICATE OF MAILING

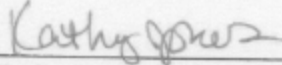
I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by  
Certified Mail, Return Receipt Requested, to:

Jim Kallas  
Plant Environmental Engineer  
General Iron Industries  
1909 N. Clifton Avenue  
Chicago, Illinois, 60614

I also certify that I sent a copy of the Request to Provide Information Pursuant to the  
Clean Air Act by E-mail to:

Julie Armitage  
Chief  
Bureau of Air  
Illinois Environmental Protection Agency  
[Julie.Armitage@Illinois.gov](mailto:Julie.Armitage@Illinois.gov)

On the 15<sup>th</sup> day of November 2017.

  
Kathy Jones, Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0006 0185 6722