

APPENDIX B

NON-APPLICABLE REGULATIONS

PERMIT SHIELD REQUEST
40 CFR 71.6(f)

Veolia requests a permit shield such that compliance with the conditions of the issued Part 71 permit shall be deemed compliance with the applicable and non-applicable requirements listed in Section IV.A, Section VI.C and Appendix B.

CITATION	REGULATION DESCRIPTION	REASON NOT APPLICABLE
PART 212		
VISIBLE AND PARTICULATE MATTER EMISSIONS		
SUBPART B		
VISIBLE EMISSIONS		
Section 212.122	Visible Emissions Limitations for Certain Emission Units For Which Construction or Modification Commenced On or After April 14, 1972	Not fuel combustion unit with heat input > 250 MMBtu/hr
SUBPART D		
PARTICULATE MATTER EMISSIONS FROM INCINERATORS		
Section 212.181	Limitations for Incinerators	Superseded by MACT Subpart EEE Standards after June 30, 2004
Section 212.182	Aqueous Waste Incinerators	Not aqueous waste refuse incinerator
Section 212.183	Certain Wood Waste Incinerators	Not wood waste incinerator
Section 212.184	Explosive Waste Incinerators	Specific to a particular incinerator
Section 212.185	Continuous Automatic Stoking Animal Pathological Waste Incinerators	Not this type of incinerator
SUBPART E		
PARTICULATE MATTER EMISSIONS FROM FUEL COMBUSTION EMISSION UNITS		
Section 212.201	Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972, Using Solid Fuel Exclusively Located in the Chicago Area	Not this old or in this area
Section 212.202	Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972, Using Solid Fuel Exclusively Located Outside the Chicago Area	Not this old using solid fuel exclusively

Section 212.203	Controlled Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972, Using Solid Fuel Exclusively	Not this old using solid fuel exclusively
Section 212.204	Emission Units For Which Construction or Modification Commenced On or After April 14, 1972, Using Solid Fuel Exclusively	Not using solid fuel exclusively
Section 212.205	Coal-fired Industrial Boilers For Which Construction or Modification Commenced Prior to April 14, 1972, Equipped with Flue Gas Desulfurization System	Not a coal fired boiler
Section 212.206	Emission Units Using Liquid Fuel Exclusively	Not a fuel combustion emission source
Section 212.207	Emission Units Using More Than One Type of Fuel	No solid fuel burned
Section 212.208	Aggregation of Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972	Not this old
Section 212.210	Emissions Limitations for Certain Fuel Combustion Emission Units Located in the Vicinity of Granite City	Not in this area
SUBPART K	FUGITIVE PARTICULATE MATTER	
Section 212.302	Geographical Areas of Application	Not in the source categories and areas for 212.304 through 212.310 and 212.312 through 212.216
SUBPART L	PARTICULATE MATTER EMISSIONS FROM PROCESS EMISSION UNITS	
Section 212.321	Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972	Incinerators don't meet the definition of a "process emission unit". Not applicable to Drum Crusher and Material Handling Areas. See discussion following table.

Section 212.322	Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972	Not defined as a "process emission unit"
Section 212.323	Stock Piles	Not this type of source
Section 212.324	Process Emission Units in Certain Areas	Not defined as a "process emission unit"
SUBPART N	FOOD MANUFACTURING	
Section 212.361	Corn Wet Milling Processes	
Section 212.362	Emission Units in Certain Areas	Not part of this source category
SUBPART O	PETROLEUM REFINING, PETROCHEMICAL AND CHEMICAL MANUFACTURING	
Section 212.381	Catalyst Regenerators of Fluidized Catalytic Converters	Not subject to Subpart O Petroleum Refining, Petrochemical and Chemical Manufacturing
SUBPART Q	STONE, CLAY, GLASS AND CONCRETE MANUFACTURING	
Section 212.421	Portland Cement Processes For Which Construction or Modification Commenced On or After April 14, 1972	
Section 212.422	Portland Cement Manufacturing Processes	
Section 212.423	Emission Limits for the Portland Cement Manufacturing Plant Located in LaSalle County, South of the Illinois River	Not part of this source category
Section 212.424	Fugitive Particulate Matter Control for the Portland Cement Manufacturing Plant and Associated Quarry Operations Located in LaSalle County, South of the Illinois River.	
Section 212.425	Emission Units in Certain Areas	
SUBPART R	PRIMARY AND FABRICATED METAL PRODUCTS AND MACHINERY MANUFACTURE	
Section 212.441	Steel Manufacturing Processes	Not part of this source category

Section 212.442	Beehive Coke Ovens	
Section 212.443	Coke Plants	
Section 212.444	Sinter Processes	
Section 212.445	Blast Furnace Cast Houses	
Section 212.446	Basic Oxygen Furnaces	
Section 212.447	Hot Metal Desulfurization Not Located in the BO	
Section 212.448	Electric Arc Furnaces	
Section 212.449	Argon-Oxygen Decarburization Vessels	
Section 212.450	Liquid Steel Charging	
Section 212.451	Hot Scarfing Machines	
Section 212.452	Measurement Methods	
Section 212.455	Highlines on Steel Mills	
Section 212.456	Certain Small Foundries	
Section 212.457	Certain Small Iron-Melting Air Furnaces	
Section 212.458 Emission Units in Certain Areas		
SUBPART S	AGRICULTURE	
Section 212.461	Grain Handling and Drying in General	Not part of this source category
Section 212.462	Grain Handling Operations	
Section 212.463	Grain Drying Operations	
Section 212.464	Sources in Certain Areas	
SUPART T	CONSTRUCTION AND WOOD PRODUCTS	
Section 212.681	Grinding, Woodworking, Sandblasting and Shotblasting	Not part of this source category

SUBPART U	ADDITIONAL CONTROL MEASURES	
Section 212.700	Subpart U Additional Control Measures - Applicability	Not defined as a "process emission unit"
Section 212.701	Contingency Measure Plans, Submittal and Compliance Date	
Section 212.702	Determination of Contributing Sources	
Section 212.703	Contingency Measure Plan Elements	
Section 212.704	Implementation	
Section 212.705	Alternative Implementation	
PART 214	SULFUR LIMITATIONS	
SUBPART B	NEW FUEL COMBUSTION EMISSION SOURCES	
Section 214.121	Large Sources	Heat input not greater than 250 MMBtu/hr
Section 214.122	Small Sources	Not a fuel combustion emission source
SUBPART C:	EXISTING SOLID FUEL COMBUSTION EMISSION SOURCES	
Section 214.141	Sources Located in Metropolitan Areas	Not an existing solid fuel combustion unit
Section 214.142	Small Sources Located Outside Metropolitan Areas	
Section 214.143	Large Sources Located Outside Metropolitan Areas	
SUBPART D:	EXISTING LIQUID OR MIXED FUEL COMBUSTION EMISSION SOURCES	
		Not an existing solid fuel combustion unit
Section 214.161	Liquid Fuel Burned Exclusively	
Section 214.162	Combination of Fuels	

SUBPART E:	AGGREGATION OF SOURCES OUTSIDE METROPOLITAN AREAS	
Section 214.181	Dispersion Enhancement Techniques	Not an existing fuel combustion unit
Section 214.182	Prohibition	
Section 214.183	General Formula	
Section 214.184	Special Formula	
Section 214.185	Alternative Emission Rate	
Section 214.186	New Operating Permits	
SUBPART F:	ALTERNATIVE STANDARDS FOR SOURCES INSIDE METROPOLITAN AREAS	
Section 214.201	Alternative Standards for Sources in Metropolitan Areas	Not an existing fuel combustion unit
Section 214.202	Dispersion Enhancement Techniques	
SUBPART K:	PROCESS EMISSION SOURCES	
Section 214.301	General Limitation	Not defined as a "process emission unit"
Section 214.302	Exception for Air Pollution Control Equipment	
Section 214.303	Use of Sulfuric Acid	
Section 214.304	Fuel Burning Process Emission Source	
SUBPART O:	PETROLEUM REFINING, PETROCHEMICAL AND CHEMICAL MANUFACTURING	
Section 214.381	Sulfuric Acid Manufacturing	Not part of this source category
Section 214.382	Petroleum and Petrochemical Processes	
Section 214.383	Chemical Manufacturing	
Section 214.384	Sulfate and Sulfite Manufacturing	

SUBPART P:	STONE, CLAY, GLASS AND CONCRETE PRODUCTS	
Section 214.401	Glass Melting and Heat Treating	Not part of this source category
Section 214.402	Lime Kilns	
SUBPART Q:	PRIMARY AND SECONDARY METAL MANUFACTURING	
Section 214.421	Combination of Fuels at Steel Mills in Metropolitan Areas	Not part of this source category
Section 214.422	Secondary Lead Smelting in Metropolitan Areas	
Section 214.423	Slab Reheat Furnaces in St. Louis Area	
SUBPART V:	ELECTRIC POWER PLANTS	
Section 214.521	Winnetka Power Plant	Not part of this source category
SUBPART X:	UTILITIES	
Section 214.561	E. D. Edwards Electric Generating Station	Not part of this source category
Section 214.562	Coffeen Generating Station	
PART 215	ORGANIC MATERIAL EMISSION STANDARDS AND LIMITATIONS	Section not applicable to Metro East Area
PART 216	CARBON MONOXIDE EMISSIONS	
SUBPART B	FUEL COMBUSTION EMISSION SOURCES	
Section 216.121	Fuel Combustion Emission Sources (>10MMBtu/hr)	Not a fuel combustion emission source
Section 216.122	Exception, Midwest Grain Products	Source specific
SUBPART C	INCINERATORS	
Section 216.141	Incinerators	Superseded by MACT Subpart EEE Standards after June 30, 2004
Section 216.142	Exceptions	< 200 lb/hr excluded; small explosive excluded

SUBPART N	PETROLEUM REFINING AND CHEMICAL MANUFACTURE	
Section 216.361	Petroleum and Petrochemical Processes	Not part of this source category
Section 216.362	Polybasic Organic Acid Partial Oxidation Manufacturing Processes	
SUBPART O	PRIMARY AND FABRICATED METAL PRODUCTS	
Section 216.381	Cupolas	Not part of this source category
Section 216.382	Exception, General Motor's Ferrous Foundry in Vermilion County	
PART 217	NITROGEN OXIDES EMISSIONS	
SUBPART B	NEW FUEL COMBUSTION EMISSION SOURCES	
Section 217.121	New Emission Sources	Heat input not greater than 250 MMBtu/hr
SUBPART C	EXISTING FUEL COMBUSTION EMISSION SOURCES	
Section 217.141	Existing Emission Sources in Major Metropolitan Areas	Heat input not greater than 250 MMBtu/hr
SUBPART K	PROCESS EMISSION SOURCES	
Section 217.301	Industrial Processes	Not part of this source category
SUBPART O	CHEMICAL MANUFACTURE	
Section 217.381	Nitric Acid Manufacturing Processes	Not part of this source category
SUBPART T	CEMENT KILNS	
Section 217.400	Applicability	Not part of this source category
Section 217.402	Control Requirements	
Section 217.404	Testing	
Section 217.406	Monitoring	
Section 217.408	Reporting	
Section 217.408	Reporting	

SUBPART U	NO_x CONTROL AND TRADING PROGRAM FOR SPECIFIED NO_x GENERATING UNITS	Not part of this source category
SUBPART V	ELECTRIC POWER GENERATION	Not part of this source category
SUBPART W	NO_x TRADING PROGRAM FOR ELECTRICAL GENERATING UNITS	Not part of this source category
SUBPART X	VOLUNTARY NO_x EMISSIONS REDUCTION PROGRAM	Not part of this source category
PART 218	ORGANIC MATERIAL EMISSION STANDARDS AND LIMITATIONS FOR THE CHICAGO AREA	Not in this area
PART 219	ORGANIC MATERIAL EMISSION STANDARDS AND LIMITATIONS FOR THE METRO EAST AREA	
SUBPART B	ORGANIC EMISSIONS FROM STORAGE AND LOADING OPERATIONS	
Section 219.119	Applicability for VOL (> .5 psia; > 40,000 gal)	Tank capacities range from 4,900 to 30,000 gallons
Section 219.120	Control Requirements for Storage Containers of VOL (> 0.75 psia < 11.1 psia; > 40,000 gal)	
Section 219.121	Storage Containers of VPL (petroleum > 1.5 psia or gas > 40,000 gal)	
Section 219.122	Loading Operations	Source not at facility
Section 219.123	Petroleum Liquid Storage Tanks	
Section 219.124	External Floating Roofs	Source not at facility
Section 219.125	Compliance Dates	Source not at facility
Section 219.127	Testing VOL Operations	
Section 219.128	Monitoring VOL Operations	
Section 219.129	Recordkeeping and Reporting for VOL Operations	

SUBPART C	ORGANIC EMISSIONS FROM MISCELLANEOUS EQUIPMENT	
Section 219.141	Separation Operations	Source not at facility
Section 219.143	Vapor Blowdown	Source not at facility
Section 219.144	Safety Relief Valves	Not applicable
SUBPART E	SOLVENT CLEANING	Source not at facility
SUBPART F	COATING OPERATIONS	Not part of this source category
SUBPART G	USE OF ORGANIC MATERIAL	Not part of this source category
Section 219.303	Fuel Combustion Emission Sources	Not applicable
Section 219.304	Operations with Compliance Program	Not an applicable source
SUBPART H	PRINTING AND PUBLISHING	Not part of this source category
SUBPART Q	SYNTHETIC ORGANIC CHEMICAL AND POLYMER MANUFACTURING PLANT	Not part of this source category
SUBPART R	PETROLEUM REFINING AND RELATED INDUSTRIES; ASPHALT MATERIALS	Not part of this source category
SUBPART S	RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS	Not part of this source category
SUBPART T	PHARMACEUTICAL MANUFACTURING BATCH OPERATIONS AND AIR OXIDATION PROCESSES	Not part of this source category
SUBPART V	AGRICULTURE	Not part of this source category
SUBPART W	CONSTRUCTION	Not part of this source category
SUBPART X	GASOLINE DISTRIBUTION	Not part of this source category
SUBPART Y	DRY CLEANERS	Not part of this source category
SUBPART Z	PAINT AND INK MANUFACTURING	Not part of this source category
SUBPART AA	POLYSTYRENE PLANTS	Not part of this source category
SUBPART BB	MARINE TERMINALS	Not part of this source category
SUBPART GG		

SUBPART HH	MOTOR VEHICLE REFINISHING	Not part of this source category
SUBPART PP	MISCELLANEOUS FABRICATED PRODUCT MANUFACTURING PROCESSES	Not part of this source category
SUBPART QQ	MISCELLANEOUS FORMULATION MANUFACTURING PROCESSES	Not part of this source category
SUBPART RR	MISCELLANEOUS ORGANIC CHEMICAL MANUFACTURING PROCESSES	Not part of this source category
SUBPART TT	OTHER EMISSION UNITS	Not part of this source category
SUBPART UU	RECORDKEEPING AND REPORTING	Not part of this source category
PART 220	NONMETHANE ORGANIC EMISSIONS	Not a MSW landfill
PART 225	CONTROL OF EMISSIONS FROM LARGE COMBUSTION SOURCES	Not a coal fired EGU
PART 228	ASBESTOS	No asbestos abatement projects
PART 229	HOSPITAL/MEDICAL/INFECTIOUS WASTE INCINERATORS	Not part of this source category
PART 237	OPEN BURNING	

FEDERAL REGULATIONS

Compliance Assurance Monitoring [40 CFR Part 64]

This regulation is not applicable to the facility or any emission unit in the facility for the following reasons:

1. The emission standards or limitations are a result of regulations established pursuant to Section 111 or 112 of the Act (ie. NESHAPS), and
2. For other emission standards, a control device is not used to achieve compliance.

NESHAPS for Mercury [40 CFR 61 Subpart E]

This regulation is not applicable to the facility because it does not belong to any of the applicable source categories listed.

NESHAPS for Benzene Emissions from Benzene Storage Vessels [40 CFR 61 Subpart Y]

This regulation is not applicable to the facility because it is not part of a benzene production facility.

NESHAPS for Benzene Emissions from Benzene Transfer Operations [40 CFR 61 Subpart BB]

This regulation is not applicable to the facility because it is not part of a benzene production facility.

STATE REGULATIONS

Particulate Emission from Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321]

This regulation is not applicable to the Drum Crusher because the potential for particulate matter emissions is negligible when crushing empty drums. It is also not applicable to the MP-1 and MP-2 units as the potential for particulate emission generation is insignificant and the processing of materials is conducted in a building.