INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
*We make Indiana a cleaner, healthier place to live.*

*Mitchell E. Daniels, Jr.*
*Governor*

*Thomas W. Easterly*
*Commissioner*

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: September 1, 2006

RE: AK Steel Corporation / 147-11043-00041

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

# Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTVOP.dot 03/23/06

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Governor

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100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.idem.IN.gov

# PART 70 OPERATING PERMIT
# OFFICE OF AIR QUALITY

**AK Steel Corporation**
**Rockport Works**
**6500 North U.S. 231**
**P.O. Box 45**
**Rockport, Indiana 47635**

**and two on-site contractors:**

**Air Liquide Industrial, U.S.L.P.**
**6500 North US Route 231**
**Rockport, Indiana 47635**

**and**

**Precision Strip, Inc.**
**6500 North US Route 231**
**Rockport, Indiana 47635**

(herein known as the Permittees) are hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

| Operation Permit No.: T147-11043-00041 | |
|---|---|
| Issued by: Original Signed By:<br>Nisha Sizemore, Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: September 1, 2006<br><br>Expiration Date: September 1, 2011 |

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## AK Steel

## Air Liquide Industrial, U.S.L.P.



## Precision Strip, Inc.

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.2, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary steel coil finishing plant with ancillary equipment.

| | |
|---|---|
| Responsible Officials: | General Manager of AK Steel, Rockport Works;<br>Manager of Precision Strip, Inc., Rockport Works; and<br>Vice President of Operations, Air Liquide Industrial, U.S.L.P. |
| Source Address: | 6500 North U.S. 231, Rockport, Indiana, 47635 |
| Mailing Address: | Same |
| General Source Phone Number: | 812/362-6144 |
| SIC Code: | 3312 |
| County Location: | Spencer |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Permit Program<br>Major Source, under PSD Rule;<br>1 of 28 Source Categories |

### A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This stationary source consists of three companies; one primary source, and two on-site contractors. The primary source is:

AK Steel Corporation (147-00041), a steel coil finishing operation, is located at 6500 North U.S. 231, Rockport, Indiana, 47635.

The two on-site contractors are:

(a) Air Liquide Industrial, U.S.L.P. (147-00049), an industrial gas production operation located inside the AK Steel plant, at 6500 North US Route 231, Rockport, Indiana 47635; and

(b) Precision Strip, Inc. (147-00051), a slitting operation located inside the AK Steel plant, at 6500 North US Route 231, Rockport, Indiana 47635.

One document for the Part 70 operating permit will be issued to AK Steel. Air Liquide Industrial, U.S.L.P. and Precision Strip, Inc., are included in this document, Operating Permit No. 147-11043-00041.

### A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units, and pollution control devices:

**AK STEEL**

(a) A Continuous Anneal and Pickling Line (APL) with a maximum normal capacity of 130 tons per hour consisting of:

(1) one (1) flattener,
(2) one (1) shear,
(3) one (1) laser welder,
(4) one (1) leveller shear,
(5) one (1) alkaline cleaner section exhausting through a wet scrubber system to Stack S06,
(6) one (1) 110.0 MMBtu/hr natural gas-fired annealing furnace section equipped with low-NOx burners with integral exhaust gas recirculation (or equivalent) exhausting to Stack S07A,
(7) one (1) 55.0 MMBtu/hr natural gas-fired annealing furnace section equipped with low-NOx burners with integral exhaust gas recirculation (or equivalent) exhausting to Stack S07B,

(8) one (1) air quench station consisting of 10 sections exhausting through a baghouse to Stack S08,
(9) one (1) water quench sections,
(10) one (1) cooling tower with 1650 gallons per minute recirculating capacity,
(11) one (1) enclosed shot blasting chamber exhausting through a baghouse to Stack S05,
(12) electrolytic pickle and rinse tanks exhausting through a wet scrubber system to Stack S09A,
(13) mixed acids pickle and rinse tanks exhausting through a multi-stage oxidation/reduction and acid neutralization scrubbing system to Stack S09B,
(14) one (1) steam heated strip dryer,
(15) skin pass temper mill and roll cleaning dust collection system exhausting through individual baghouses to Stack S09C, and
(16) one (1) tension/leveller and side trimmer.

(b) A Continuous Pickling Line (CPL) with a maximum normal capacity of 476 tons per hour consisting of:

(1) one (1) strip leveller and one (1) mechanical scale breaker exhausting through a baghouse to Stack S01,
(2) one (1) laser welder and one (1) tension leveller,
(3) three (3) HCl (Hydrochloric) acid pickle and rinse tanks;

(A) when processing carbon steel only: three (3) HCI acid pickle and rinse tanks exhausting through a wet scrubber system to Stack S02;

(B) when processing stainless steels only: three (3) HCI acid pickle tanks exhausting through a wet scrubber system to Stack S02; mixed acid and rinse tanks exhausting through a wet scrubber system Stack S02, through the electrolytic pickle scrubber system on the APL to Stack S09A, and exhausting through the multi-stage oxidation/reduction and acid neutralization scrubbing system on the APL at Stack S09B.

(4) one (1) steam heated pickle dryer,
(5) one (1) shear/trimmer, and
(6) one (1) CPL electrostatic oiler.

(c) A Continuous Cold Mill (CCM) with a maximum normal capacity of 660 tons per hour consisting of:

(1) one (1) strip leveller and one (1) shear,
(2) one (1) laser welder,
(3) five (5) cold reduction mills exhausting through one (1) mist elimination system to Stack S11; and
(4) one (1) cold mill rotary shear and tension reels.

(d) One (1) Temper Mill with a maximum capacity of 300 tons per hour exhausting through one (1) oil mist elimination system to Stack S16.

(e) A Continuous Galvanizing Line (CGL) with a maximum normal capacity of 183.6 tons per hour consisting of:

(1) one (1) flattener,
(2) one (1) mash seam welder,
(3) alkaline cleaning system exhausting through a wet scrubber system to Stack S17,
(4) one (1) 4.1 MMBtu/hr natural gas-fired cleaning section dryer,
(5) one (1) 205.7 MMBtu/hr annealing furnace with a continuous emissions monitor (CEM) and controlled by a selective catalytic reduction (SCR) system exhausting to Stack S18,
(6) one (1) 7.0 MMBtu/hr natural gas-fired back-up galvanneal soak section burner,
(7) one (1) 2.05 MMBtu/hr natural gas-fired preheater for the zinc pot equipment,
(8) one (1) induction zinc premelt pot,
(9) one (1) induction heated zinc coating pot,
(10) one (1) 0.82 MMBtu/hr natural gas-fired edge burner,
(11) one (1) water quench cooling section with a closed loop, recirculating water spray,

(12) one (1) 4.1 MMBtu/hr natural gas-fired dryer,
(13) one (1) skin pass temper mill and one (1) tension leveller,
(14) one (1) chromate application system with one (1) roll coater,
(15) one (1) 6.0 MMBtu/hr natural gas-fired dryer,
(16) one (1) phosphate application system with one (1) roll coater,
(17) one (1) 5.68 MMBtu/hr natural gas-fired dryer,
(18) one (1) CGL electrostatic oiler, and
(19) one (1) rotary shear.

(f) A Roll Repair Shop consisting of:

(1) Two (2) electrolytic chrome dip tanks, identified as 1 East and 1 West constructed in 1998, rated at 36 tons per hour steel rolls each, or 5.5 gallons per hour chromium solution, with both exhausting through a composite mesh pad mist elimination system to Stack S15.

(2) One (1) electrodischarge texturing machine exhausting through a baghouse to the interior of the building.

(g) Ancillary Equipment, as listed is;

(1) Hydrogen batch annealing with fifteen (15) natural gas-fired furnaces with low-NOx burners rated at 6.75 MMBtu/hr exhausting through the roof vent system in building 500;

(2) Space heaters and air make-up units with each unit limited to no more than 5.2 MMBtu/hr and a combined rating limited to no more than 251 MMBtu/hr;

(3) Two (2) non-contact cooling towers with mist drift eliminators exhausting to the atmosphere;

(4) Storage tanks for HCl acid, nitric acid, and HF (Hydroflouric) acid exhausting through a fume scrubber to Stack S04 consisting of:

(A) One (1) HF acid tank with a capacity of 20,000 gallons;

(B) One (1) nitric acid tank with a capacity of 20,000 gallons;

(C) Three (3) waste acid tanks, each with a capacity of 40,000 gallons, or 120,000 gallons combined;

(D) Three (3) HCL/ra acid tanks, each with a capacity of 20,000 gallons, or 60,000 gallons combined; and

(E) Two (2) CPL waste acid tanks, each with a capacity of 20,000 gallons, or 40,000 gallons combined.

(5) Miscellaneous storage tanks at the continuous cold mill (CCM) operation not to exceed an overall capacity of 353,000 gallons, consisting of:

(A) Two (2) Morgoil System 2 tanks, No.1 and No.2, each with a capacity of 18,500 gallons, or 37,000 gallons combined;

(B) One (1) CCM gear lube tank, with a capacity of 13,500 gallons;

(C) One (1) base oil storage tank, with a capacity of 10,000 gallons;

(D) One (1) direct oil tank, with a capacity of 4,000 gallons;

(E) Two (2) Emulsion tanks, No.1 and No.2, each with a capacity of 88,000 gallons, or 176,000 gallons combined; and

(F) Two (2) Emulsion tanks, No.3 and No.4, each with a capacity of 44,000 gallons, or 88,000 gallons combined.

(6) Miscellaneous storage tanks at the temper mill operation not to exceed an overall capacity of 131,000 gallons, consisting of:

(A) One (1) direct oil application tank, with a capacity of 4,000 gallons;

(B) Three (3) temper mill tanks, TM1-UZ203, LSL-01, 02, and 03, each with a capacity of 10,000 gallons, or 30,000 gallons combined;

(C) One (1) base oil tank, with a capacity of 8,000 gallons;

(D) One (1) solution tank, with a capacity of 3,200 gallons;

(E) One (1) gear lube tank, TM-1-P-2084, with a capacity of 2,100 gallons; and

(F) Two (2) Morgoil tanks, TM-1-P-2000 and 99, each with a capacity of 5,300 gallons, or 10,600 gallons combined.

(7) Miscellaneous oil storage tanks for the continuous galvanizing line (CGL) not to exceed an overall capacity of 16,250 gallons, consisting of:

(A) One (1) tank, GL1-PGOL-TNK-01, with a capacity of 6,000 gallons; and

(B) Three (3) tanks, GL1-PGOL-TNK-02, 03, and 04, each with a capacity of 3,000 gallons, or 9,000 gallons combined.

(8) A miscellaneous oil storage tank for the continuous pickling line (CPL), consisting of one (1) CPL pickling tank, with a capacity of 15,000 gallons.

(h) Rolling oils, rust preventative oils, and prelube oils.

(i) Process boilers consisting of:

(1) North Boilers: Two (2) natural gas-fired boilers with ultra low-NOx burners, constructed in 1998, each rated at 76.0 MMBtu/hr heat input, exhausting to Stack S03.

(2) South Boilers: Two (2) natural gas-fired boilers with ultra low-NOx burners, constructed in 1998, each rated at 76.0 MMBtu/hr heat input, exhausting to Stack S20.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

(a) This stationary source also includes the following insignificant activities, operated by AK Steel, which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Emissions from a laboratory as defined in this clause.

(A) Three (3) chemical – process testing laboratories: one each at the APL, CPL, and Roll Shop.
(B) One (1) process sample testing laboratory located at the WWTP (Waste Water Treatment Plant).
(C) One (1) process sample testing laboratory located at the Fluids Manager complex.
(D) One (1) steel sample physical laboratory and fume hood located in the CGL.

(2) Fuel dispensing activities, including the following:

(A) One (1) gasoline fuel transfer dispensing operation, handling less than 1,300 gal/day, with storage tank capacity of 1,100 gallons.
(B) One (1) petroleum fuel other than gasoline dispensing operation, handling less than 3,500 gal/day, with storage tank capacity of 1,100 gallons.

(3) Production related activities, including the following:

(A) Four (4) roll grinders, wherein cutting coolant continuously floods the machining interface, located in the roll repair shop.
(B) One (1) soapy water bearing washer/degreasing operation with a capacity of approximately 50 gallons, located in the roll repair shop.
(C) One (1) waste water treatment plant for treatment of process waste water.

(4) Activities associated with the following recovery systems: four (4) rolling oil circulation and recovery systems, located in the CCM Emulsion Room.

(5) Repair activities, including the following:

(A) Repair of baghouses, mist eliminators and scrubbers.
(B) Cleaning of APL cooling tower.
(C) Changeover from carbon to stainless and vice versa at the CPL.

(6) Flue gas conditioning systems and associated chemicals, such as the following: Ammonia is used in the deNOx system on the CGL Annealing Furnace.

(7) Blowdown for the following:

(A) Four (4) natural gas-fired boilers, listed in Section D.8, are equipped with automatic blowdown.
(B) Four (4) cooling towers, listed as ancillary equipment or in specific processes, are equipped with automatic blowdown.

(8) Activities associated with emergencies, including the following emergency generators:

(A) Diesel Powered – 519 HP, located at Primary Substation
(B) Diesel Powered – 1109 HP, located at CGL
(C) Diesel Powered – 1180 HP, located at CCM
(D) Diesel Powered – 349 HP, located at TM
(E) Diesel Powered – 1039 HP, located at APL/CPL
(F) Diesel Powered – 1039 HP, located at Reservoir
(G) Diesel Powered – 235 HP, located at Reservoir - Fire

(b) This stationary source also includes the following insignificant activities, operated by on-site contractors, which are specifically regulated, as defined in 326 IAC 2-7-1(21):

**AIR LIQUIDE INDUSTRIAL, U.S.L.P.**

(a) One (1) hydrogen generator using natural gas as feedstock, maximum input capacity of 6.24 MMBtu/hr;

(b) One (1) cooling tower, maximum capacity of 3,700 gallons per minute; and

(c) One (1) natural gas-fired emergency generator, maximum capacity of 80 KVA, with natural gas consumption rate of 1,138 cuft per hour.

**PRECISION STRIP, INC.**

(a) One (1) backup electrostatic oiler, with a maximum capacity of 123.2 pounds per hour oil, not to exceed 15% of Precision Strip's total operation.

(b) Mechanical cold rolled steel coil slitting operation, rated at 176,000 pounds per hour coiled steel, using various oils, with no emissions.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, T147-11043-00041, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

(b) If IDEM, OAQ, (and local agency if applicable), upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]

(a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of

any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Telephone Number: 1-888-672-8323 (Southwest Regional Office)
Facsimile Number: 812-380-2304 (Southwest Regional Office)

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

IDEM Southwest Regional Office
1120 North Vincennes Avenue
P.O. Box 128
Petersburg, Indiana 47567-0128

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T147-11043-00041 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the

"responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document, all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability

between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

B.25 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

**SECTION C** **SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, and A147-11471-00041, issued April 18, 2002, the emissions of sulfur dioxide, asbestos, lead, beryllium, mercury, vinyl chloride, fluorides, hydrogen sulfide, sulfuric acid mist and total reduced sulfur compounds (including hydrogen sulfide) shall not exceed the annual significant levels established in 326 IAC 2-2 (PSD) and 40 CFR 52.21. Therefore the requirements of 326 IAC 2-2 and 40 CFR 52.21 are not applicable.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 17, and A147-11471-00041, issued April 18, 2002, operation condition 17, the Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

(a) For AK Steel, pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan included in Construction Permit 147-6713-00041, issued February 13, 1997, and amended in Amendment 147-10571-00041, issued March 4, 1999. The plan consists of AK Steel Corporation meeting all of the following criteria:

(1) All roads associated with routine plant operations and parking lots located on the AK Steel property shall be paved;

(2) All paved road segments and parking lots shall be cleaned with a vehicular vacuum sweeper once every month to control PM10 emissions to no more than 3 tons per year and PM emissions to no more than 15 tons per year. Additionally, the following requirements shall apply:

(A) If a fugitive dust problem occurs at any time, the Permittee shall employ the sweeper as soon as practicably possible in the incident areas;

(B) After each incident, and the initial sweeper cleaning thereof, the Permittee shall sweep all incident areas, a second time, but no longer than 14 days after the incident; and

(C) The monthly schedule resumes only after 14 consecutive incident - free days have passed.

(3) Silt surface loading shall not exceed 16.8 pounds of silt per mile.

The cleaning activities of the paved road segments and parking lots may be delayed by one day when:

(1) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning;

(2) The road segment is closed or abandoned. Abandoned roads will be barricaded to prevent vehicle access;

(3) It is raining at the time of the scheduled cleaning; or

(4) Road surface temperature is below 35 degrees Fahrenheit.

Upon request of the Assistant Commissioner, AK Steel Corporation shall sample surface material silt content and surface dust loadings at paved segments specified by IDEM in accordance with field and laboratory procedures set by IDEM within 15 days of the request. The sample results shall be submitted to IDEM within 30 days of the sample date. Supplemental cleaning parameters of the paved roads and/or parking lots found to exceed the controlled silt surface loading of 16.8 pounds of silt per mile shall also be submitted to the IDEM within 30 days of the sample date.

(b) The plan does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.8 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.9 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.10 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

**Testing Requirements [326 IAC 2-7-6(1)]**

C.11 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

C.12 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

C.13 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.14 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)][326 IAC 3-5]

(a) The Permittee shall calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.

(b) All continuous emission monitoring systems shall meet all applicable performance specifications of 40 CFR 60 or any other performance specification, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.

(c) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

(d) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or is down for maintenance or repairs, the following shall be used as an alternative to continuous data collection:

Supplemental or intermittent monitoring of the parameter shall be implemented as specified in Section D of this permit until such time as the primary continuous emission monitoring system is back in operation, if the CEMS is not used to monitor $NO_X$ or $SO_2$ emissions pursuant to 40 CFR 75 or 326 IAC 10-4.

(e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a

continuous emission monitoring system pursuant to 326 IAC 3-5 and Construction Permit 147-6713-00041, issued February 13, 1997.

C.15 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.16 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

C.17 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.18 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.19 Response to Excursions and Exceedances 326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking

any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.20 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.21 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

(c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, document and maintain the following records:
  (A) A description of the project.
  (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
  (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
    (i) Baseline actual emissions;
    (ii) Projected actual emissions;
    (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
    (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report

shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C-General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and/or 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for

inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

**Stratospheric Ozone Protection**

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:

(a) A Continuous Anneal and Pickling Line (APL) with a maximum normal capacity of 130 tons per hour consisting of:

(1) one (1) flattener,
(2) one (1) shear,
(3) one (1) laser welder,
(4) one (1) leveller shear,
(5) one (1) alkaline cleaner section exhausting through a wet scrubber system to Stack S06,
(6) one (1) 110.0 MMBtu/hr natural gas-fired annealing furnace section equipped with low-NOx burners with integral exhaust gas recirculation (or equivalent) exhausting to Stack S07A,
(7) one (1) 55.0 MMBtu/hr natural gas-fired annealing furnace section equipped with low-NOx burners with integral exhaust gas recirculation (or equivalent) exhausting to Stack S07B,
(8) one (1) air quench station consisting of 10 sections exhausting through a baghouse to Stack S08,
(9) one (1) water quench section,
(10) one (1) cooling tower with 1650 gallons per minute recirculating capacity,
(11) one (1) enclosed shot blasting chamber exhausting through a baghouse to Stack S05,
(12) electrolytic pickle and rinse tanks exhausting through a wet scrubber system to Stack S09A,
(13) mixed acids pickle and rinse tanks exhausting through a multi-stage oxidation/reduction and acid neutralization scrubbing system to Stack S09B,
(14) one (1) steam heated strip dryer,
(15) skin pass temper mill and roll cleaning dust collection system exhausting through individual baghouses to Stack S09C, and
(16) one (1) tension/leveller and side trimmer.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.1.1 Particulate Matter (PM/PM10) Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 21, and A147-11471-00041, issued April 18, 2002, operation condition 21, and 326 IAC 2-2 (PSD BACT), the processes of the Continuous Annealing and Pickling Line shall be limited as follows:

(a) The alkaline cleaner shall be enclosed and maintained under negative pressure. The filterable particulate matter ($PM/PM_{10}$) generated from this process shall be controlled by a wet scrubber system. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0044 grains per dscf and 0.377 pounds per hour.

(b) Filterable particulate matter (PM/PM10) generated from the air quench station shall be controlled by a baghouse (S08). Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.005 grains per dscf and 1.41 pounds per hour.

(c) The shot blaster chamber shall be enclosed and maintained under negative pressure. The particulate matter generated from the operation shall be exhausted to a baghouse (S05) with an outlet grain loading not to exceed 0.000009 grains per dscf. The particulate matter emissions shall not exceed 0.006 pounds per hour.

(d) Filterable particulate emissions (PM/PM10) generated from the electrolytic pickling section shall be controlled by a wet scrubber system (S09A). The outlet grain loading from the scrubber for filterable particulate matter shall not exceed 0.0022 grains per dscf and 0.349 pounds per hour. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0093 grains per dscf and 0.77 pounds per hour.

(e) The mixed acid pickle and rinse tanks shall be enclosed and maintained under negative pressure. The particulate matter generated from this process shall be controlled by a wet scrubber system (S09B). The outlet grain loading for filterable particulate matter shall not exceed 0.003 grains per dscf and 0.153 pounds per hour. Total particulate matter (including condensible PM10) shall not exceed 0.0060 grains per dscf and 0.28 pounds per hour.

(f) The strip dryer shall only use steam heat.

(g) Filterable particulate matter (PM/PM10) generated from the skin pass temper mill and roll cleaning dust collection system shall be controlled by individual baghouses to a common Stack (S09C). Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0066 grains per dscf and 0.459 pounds per hour.

For parts (b), (d), (e) and (g), the OAQ may revise this permit to adjust the total PM/PM10 limitation based upon the results of IDEM approved stack testing. The Department will provide an opportunity for public notice and comment prior to finalizing any permit revision. IC 13-15-7-3 (Revocation or Modification of a Permit: Appeal to Board) shall apply to this permit condition.

D.1.2 Nitrogen Oxides (NOx) Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 21, and A147-11471-00041, issued April 18, 2002, and 326 IAC 2-2 (PSD BACT), the processes of the Continuous Annealing and Pickling Line shall be limited as follows:

(a) The 110.0 MMBtu per hour annealing furnace section No.1 and the 55.0 MMBtu per hour annealing furnace section No.2 shall each use only natural gas and NOx emissions shall be controlled by ultra low-NOx burners with integral exhaust gas recirculation (or its equivalent). Pursuant to Significant Source Modification 147-19502-00041, issued August 5, 2005, nitrogen oxide emissions from the furnaces shall not exceed the following limits:

| Furnace | Stainless Steel Type | lb/MMBtu | lb/hr |
|---|---|---|---|
| 110 MMBtu/hr (Section No.1) | | | |
| | 400 Cold Roll | 0.08 | 8.0 |
| | 300 Cold Roll | 0.087 | 9.6 |
| | 300 Hot Roll | 0.04 | 4.4 |
| 55 MMBtu/hr (Section No.2) | | | |
| | 400 Cold Roll | 0.14 | 7.7 |
| | 300 Cold Roll | 0.11 | 6.1 |
| | 300 Hot Roll | 0.04 | 2.2 |

(b) The Permittee shall employ an operational practice called “smoke and anneal” for certain grades of stainless steel in the 110.0 MMBtu per hour annealing furnace section No.1 and the 55.0 MMBtu per hour annealing furnace section No.2. This operational practice shall be limited to no more than 48 days or 1152 hours per 12 consecutive month period. The outlet nitrogen oxide loading shall not exceed 0.080 pounds per MMBtu during this operation. The combined nitrogen oxide emissions from the two sections of the annealing furnace shall not exceed 13.2 pounds per hour and 7.60 tons per year for this operation.

(c) The mixed acid pickle and rinse tanks shall be enclosed and maintained under negative pressure. The nitrogen oxide generated from this process shall be controlled by a wet scrubber system (S09B). The outlet nitrogen oxide loading shall not exceed 175 ppmvd and the nitrogen oxide emissions shall not exceed 9.66 pounds per hour.

**Compliance Determination Requirements**

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within five years after the most recent stack test or 36 months after issuance of this Part 70 permit, whichever is later, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM and PM-10 testing for S06, S08, S09A, S09B, and S09C, and NOx testing for S07A, S07B, and S09B utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible components. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.4 Control Equipment [326 IAC 2-2]

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10, and 326 IAC 2-2 (PSD), upon startup, the baghouses (S05, S08, S09C), shall be operated at all times and controlling PM when their respective emission units are in operation.

(b) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, and 326 IAC 2-2 (PSD), upon startup, the scrubbers (S06, S09A, S09B), shall be operated at all times when their respective emission units are in operation.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.1.5 Visible Emissions Notations

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 13, and Amendment 147-11471-00041, issued April 18, 2002, and 326 IAC 2-2 (PSD) visible emission notations of stack exhausts (S05, S06, S08, S09A, S09B, S09C) shall be performed. These notations shall be taken once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee, including trained personnel under contract with the source, is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.

D.1.6 Parametric Monitoring for Baghouses

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10, and 326 IAC 2-2 (PSD), the Permittee shall record the total static pressure drop across the baghouses (S05, S08, S09C) used in conjunction with the APL at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.3 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(b) The gauge employed to take the pressure drop across the baghouses shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within ±2% of full scale reading for S05 and S09C, and within ±0.25% (or ±5 digits at 22 degrees Celsius) for S08. The instrument shall be quality assured and maintained as specified by the vendor.

D.1.7 Baghouse Inspections

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10, and 326 IAC 2-2 (PSD), an inspection shall be performed each calendar quarter for the APL baghouses (S05, S08, S09C). Inspections required by this condition shall not be performed in consecutive months. Defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10(e), and 326 IAC 2-2 (PSD), in the event that a bag's failure has been observed:

(a) The process associated with the affected compartments will be shut down immediately until the failed units have been repaired or replaced.

(b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.1.9 Parametric Monitoring for Scrubbers

(a) Pursuant to Permit 147-11471-00041, issued April 18, 2002, and 326 IAC 2-2 (PSD), the Permittee shall record the pH of the scrubbing liquid (if applicable), pressure drop and scrubbing liquid flow rate of the scrubbers (S06, S09A, S09B) used in conjunction with the APL at least once per day when the process is in operation. When for any one reading, the pressure drop across a scrubber, the flowrate, or the pH of the scrubbing liquid is outside its normal range, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions and Exceedances. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a violation of this permit.

The instruments used for determining the pH of the scrubbing liquid (if applicable), pressure drop, and scrubbing liquid flow rate at the inlet of the control device shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(b) The gauge employed to take the pressure drop across the scrubbers or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within ±0.25% (or ±5 digits at 22 degrees Celsius) for S06, S09A, and S09B. The instrument shall be quality assured and maintained as specified by the vendor.

D.1.10 Scrubber Inspections

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, and 326 IAC 2-2 (PSD), an inspection shall be performed each calendar quarter of the scrubbers (S06, S09A, S09B). Inspections required by this condition shall not be performed in consecutive months. Defective scrubber components shall be replaced.

D.1.11 Scrubber Failure

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, and 326 IAC 2-2 (PSD), in the event that failure of a scrubber has been observed:

(a) The process associated with the affected unit will be shut down immediately until the failed unit has been repaired or replaced.

(b) Based upon the findings of the inspection, or any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.1.12 Record Keeping Requirements

(a) To document compliance with Condition D.1.2(b), the Permittee shall maintain hourly records of the “smoke and anneal” operational practice.

(b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations for stacks S05, S06, S08, S09A, S09B, and S09C.

(c) To document compliance with Condition D.1.6, the Permittee shall maintain once per day records of the total static pressure drop during normal operation when exhausting to the atmosphere.

(d) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10, and 326 IAC 2-2 (PSD), a record shall be kept of the results of the inspections and the number of bags replaced to document compliance with Condition D.1.7.

(e) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, and 326 IAC 2-2 (PSD), to show compliance with conditions D.1.9, D.1.10, and D.1.11, records shall be kept and made available upon request to the Office of Air Quality (OAQ).

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements,

of this permit. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

**SECTION D.2 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:

(b) Continuous Pickling Line (CPL) with a maximum capacity of 476 tons per hour consisting of:

(1) one (1) strip leveller and one (1) mechanical scale breaker exhausting through a baghouse to Stack S01,
(2) one (1) laser welder and one (1) tension leveller,
(3) three (3) HCl acid pickle and rinse tanks;

(A) when processing carbon steel only: three (3) HCI acid pickle and rinse tanks exhausting through a wet scrubber system to Stack S02;

(B) when processing stainless steels only: three (3) HCI acid pickle tanks exhausting through a wet scrubber system to Stack S02; mixed acid and rinse tanks exhausting through a wet scrubber system to Stack S02, through the electrolytic pickle scrubber system on the APL to Stack S09A, and exhausting through the multi-stage oxidation/reduction and acid neutralization scrubbing system on the APL at Stack S09B.

(4) one (1) steam heated pickle dryer,
(5) one (1) shear/trimmer, and
(6) one (1) CPL electrostatic oiler.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.2.1 Particulate Matter (PM/PM10) Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to 326 IAC 2-2-3 (Best Available Control Technology), Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 22, and A147-11471-00041, issued April 18, 2002, and 326 IAC 2-2 (PSD BACT), the processes of the continuous pickling line (CPL) shall be limited as follows:

(a) Filterable particulate matter (PM/PM10) generated from the strip leveller and mechanical scale breaker shall be controlled by a baghouse. The outlet grain loading of the baghouse for filterable particulate matter shall not exceed 0.0044 grains per dscf and 1.52 pounds per hour. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0076 grains per dscf and 3.69 pounds per hour.

(b) The HCl pickling baths and rinse tanks shall be enclosed and maintained under negative pressure. The filterable particulate matter (PM/PM10 HCl acid mist) generated from this process shall be controlled by a wet scrubber system. The outlet grain loading from the scrubber for filterable particulate matter shall not exceed 0.0020 grains per dscf and 0.206 pounds per hour. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0091 grains per dscf and 0.61 pounds per hour.

(c) The pickling line dryer shall only use steam heat.

(d) The rust Preventive oils shall be applied to the metal strips electrostatically.

For parts (a) and (b), the OAQ may revise this permit to adjust the total PM/PM10 limitation based upon the results of IDEM approved stack testing. The Department will provide an opportunity for public notice and comment prior to finalizing any permit revision. IC 13-15-7-3 (Revocation or Modification of a Permit: Appeal to Board) shall apply to this permit condition.

D.2.2 Hazardous Air Pollutants

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 19, and Amendment 147-11471-00041, issued April 18, 2002, the emissions of hazardous air pollutants from the entire source shall be less than 10 tons per 365 day period for any individual HAP and 25 tons per 365 day period of any combination of HAPs.

**Compliance Determination Requirements**

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within five years after the most recent stack test or 36 months after issuance of this Part 70 permit, whichever is later, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM and PM-10 testing for S01 and S02 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible components. Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.4 Particulate Matter (PM) Control [326 IAC 2-2]

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10, and 326 IAC 2-2 (PSD), upon startup, baghouse (S01) shall be operated at all times and controlling PM when its associated facility is in operation.

(b) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, and 326 IAC 2-2 (PSD), upon startup, scrubber S02 shall be operated at all times and controlling PM when its associated facility is in operation.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.2.5 Visible Emissions Notations

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 13, and 326 IAC 2-2 (PSD), visible emission notations of stacks S01 and S02 shall be performed. These notations shall be taken once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee, including trained personnel under contract with the source, is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.

D.2.6 Parametric Monitoring for Baghouse

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10, and 326 IAC 2-2 (PSD), the Permittee shall record the total static pressure drop across the baghouse (S01) used in conjunction with the CPL at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(b) The gauge employed to take the pressure drop across the baghouse, or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be

accurate within ±2% of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

D.2.7 Baghouse Inspections

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10, and 326 IAC 2-2 (PSD), an inspection shall be performed each calendar quarter for the CPL baghouse (S01). Inspections required by this condition shall not be performed in consecutive months. Defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10(e), and 326 IAC 2-2 (PSD), in the event that a bag's failure has been observed:

(a) The process associated with the affected compartments will be shut down immediately until the failed units have been repaired or replaced.

(b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.2.9 Parametric Monitoring for Scrubber

(a) Pursuant to A147-11471-00041, issued April 18, 2002, and 326 IAC 2-2 (PSD), the Permittee shall record the pH of the scrubbing liquid, pressure drop and scrubbing liquid flow rate of scrubber S02 at least once per day when the process is in operation. When for any one reading, the pressure drop across the scrubber, or the pH of the scrubbing liquid is outside its normal range, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions and Exceedances. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a violation of this permit.

The instruments used for determining the pH of the scrubbing liquid, pressure drop, and scrubbing liquid flow rate at the inlet of the control device shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(b) The gauge employed to take the pressure drop across the scrubbers shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within 0.25% (or ±5 digits at 22 degrees Celsius) for S02. The instrument shall be quality assured and maintained as specified by the vendor.

D.2.10 Scrubber Inspections

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, and 326 IAC 2-2 (PSD), an inspection shall be performed each calendar quarter of the scrubber (S02). Inspections required by this condition shall not be performed in consecutive months. Defective scrubber components shall be replaced.

D.2.11 Scrubber Failure

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, and 326 IAC 2-2 (PSD), in the event that failure of a scrubber (S02) has been observed:

(a) The process associated with the affected unit will be shut down immediately until the failed unit has been repaired or replaced.

(b) Based upon the findings of the inspection, or any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.2.12 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations for stacks S01 and S02.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain once per day records of the

total static pressure drop during normal operation when exhausting to the atmosphere.

(c) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10 a record shall be kept of the results of the inspections and the number of bags replaced to document compliance with Condition D.2.7. These records shall be kept and made available upon request to the Office of Air Quality.

(d) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, to show compliance with conditions D.2.9, D.2.10, and D.2.11, records shall be kept and made available upon request to the Office of Air Quality (OAQ).

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

**SECTION D.3 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:

(c) A Continuous Cold Mill (CCM) with a maximum normal capacity of 660 tons per hour consisting of:

(1) one (1) strip leveller and one (1) shear,
(2) one (1) laser welder,
(3) five (5) cold reduction mills exhausting through one (1) mist elimination system to S11; and
(4) one (1) cold mill rotary shear and tension reels.

(d) A Temper Mill with a maximum capacity of 300 tons per hour exhausting to one (1) oil mist elimination system to Stack S16.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.3.1 Particulate Matter (PM/PM10) Best Available Control Technology (BACT) [326 IAC 2-2]

(a) Pursuant to 326 IAC 2-2-3 (Best Available Control Technology), Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 23, and A147-11471-00041, issued April 18, 2002, and 326 IAC 2-2 (PSD BACT), the five-strand cold reduction mill shall be enclosed and maintained under negative pressure. The filterable particulate matter (PM/PM10) generated from this process shall be controlled by a mist elimination system. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0087 grains per dscf and 16.1 pounds per hour.

(b) Pursuant to 326 IAC 2-2-3 (Best Available Control Technology), Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 25, and A147-11471-00047, issued April 18, 2002, and 326 IAC 2-2 (PSD BACT), the filterable particulate matter (PM/PM10) generated from the temper mill shall be controlled by a mist eliminator. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.010 grains per dscf and 5.71 pounds per hour.

For parts (a) and (b), the OAQ may revise this permit to adjust the total PM/PM10 limitation based upon the results of IDEM approved stack testing. The Department will provide an opportunity for public notice and comment prior to finalizing any permit revision. IC 13-15-7-3 (Revocation or Modification of a Permit: Appeal to Board) shall apply to this permit condition.

D.3.2 Opacity Best Available Control Technology [326 IAC 2-2]

Pursuant to 326 IAC 2-2-3 (Best Available Control Technology) and Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 14, and 326 IAC 2-2 (PSD BACT), visible emissions from stacks S11 and S16 shall not exceed an average of five (5) percent opacity in 24 consecutive readings.

**Compliance Determination Requirements**

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within five years after the most recent stack test or 36 months after issuance of this Part 70 permit, whichever is later, in order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM and PM-10 testing for S11 and S16 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible components. Testing shall be conducted in accordance with Section C- Performance Testing.

D.3.4 Particulate Matter (PM) Control [326 IAC 2-2]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 12, and 326 IAC 2-2 (PSD), each mist elimination system (S11, S16) shall be in operation at all times when its associated facility in operation.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.3.5 Visible Emissions Notations

(a) Visible emission notations of stack exhausts S11 and S16 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.

D.3.6 Parametric Monitoring

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 12, and 326 IAC 2-2 (PSD), the Permittee shall record the pressure drop of the mist elimination systems (S11, S16) used in conjunction with the CCM at least once per day when in operation. When for any one reading, the pressure drop across the systems are outside their normal range, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a violation of this permit.

The instruments used for determining the pressure drop shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(b) The gauge employed to take the pressure drop across the mist elimination systems shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within 0.25% (or ±5 digits at 22 degrees Celsius) of full scale reading for S11 and S16. The instrument shall be quality assured and maintained as specified by the vendor.

D.3.7 Mist Eliminator Inspections

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 12, and 326 IAC 2-2 (PSD), an inspection shall be performed each calendar quarter of the mist elimination systems. Inspections required by this condition shall not be performed in consecutive months. Defective mist eliminator components shall be replaced.

D.3.8 Mist Eliminator Failure

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 12, and 326 IAC 2-2 (PSD), in the event that a mist elimination system's failure has been observed:

(a) The process associated with the affected unit will be shut down immediately until the failed unit has been repaired or replaced.

(b) Based upon the findings of the inspection, or any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.3.9 Record Keeping Requirements

(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations for stacks S11 and S16.

(b) To show compliance with condition D.3.6, the Permittee shall maintain records of the pressure drop during normal operation when exhausting to the atmosphere.

(c) To show compliance with condition D.3.7, and pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 12, a record shall be kept of the results of the inspection and the number of mist eliminator components replaced.

(d) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 12, and 326 IAC 2-2 (PSD), to show compliance with conditions D.3.6, D.3.7, and D.3.8, records shall be kept and made available upon request to the Office of Air Quality (OAQ).

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

**SECTION D.4 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:

(e) A Continuous Galvanizing Line (CGL) with a maximum normal capacity of 183.6 tons per hour consisting of:

(1) one (1) flattener,
(2) one (1) mash seam welder,
(3) alkaline cleaning system exhausting through a wet scrubber system to Stack S17,
(4) one (1) 4.1 MMBtu/hr natural gas-fired cleaning section dryer,
(5) one (1) 205.7 MMBtu/hr annealing furnace with NOx emissions measured by a continuous emissions monitor (CEM) and controlled by a selective catalytic reduction (SCR) system, exhausting to Stack S18,
(6) one (1) 7.0 MMBtu/hr natural gas-fired back-up galvanneal soak section burner,
(7) one (1) 2.05 MMBtu/hr natural gas-fired preheater for the zinc pot equipment,
(8) one (1) induction zinc premelt pot,
(9) one (1) induction heated zinc coating pot,
(10) one (1) 0.82 MMBtu/hr natural gas-fired edge burner,
(11) one (1) water quench cooling section with a closed loop, recirculating water spray,
(12) one (1) 4.1 MMBtu/hr natural gas-fired dryer,
(13) one (1) skin pass temper mill and one (1) tension leveller,
(14) one (1) chromate application system with one (1) roll coater,
(15) one (1) 6.0 MMBtu/hr natural gas-fired dryer,
(16) one (1) phosphate application system with one (1) roll coater,
(17) one (1) 5.68 MMBtu/hr natural gas-fired dryer,
(18) one (1) CGL electrostatic oiler, and
(19) one (1) rotary shear

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.4.1 Particulate Matter (PM/PM10) Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 24, A147-11471-00041, issued April 18, 2002, and 326 IAC 2-2-3 (Best Available Control Technology), the filterable particulate matter (PM/PM10) generated from the alkaline cleaning baths and rinse tanks shall be controlled by a wet scrubber system (S17). The outlet grain loading from the scrubber for filterable particulate matter shall not exceed 0.0022 grains per dscf and 0.125 pounds per hour. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0065 grains per dscf and 0.382 pounds per hour.

The OAQ may revise this permit to adjust the total PM/PM10 limitation based upon the results of IDEM approved stack testing. The Department will provide an opportunity for public notice and comment prior to finalizing any permit revision. IC 13-15-7-3 (Revocation or Modification of a Permit: Appeal to Board) shall apply to this permit condition.

D.4.2 Nitrogen Oxides (NOx) Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 24, and 326 IAC 2-2-3 (Best Available Control Technology), the outlet nitrogen oxide loading from the 205.7 MMBtu/hr annealing and induction heating galvannealing furnace shall not exceed 0.06 pounds per MMBtu. The nitrogen oxide emissions shall not exceed 12.3 pounds per hour.

D.4.3 Continuous Galvanizing Line Processes Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 24, and 326 IAC 2-2-3 (Best Available Control Technology):

(a) The 4.10 MMBtu per hour cleaning section dryer shall only use natural gas.

(b) The 7.0 MMBtu per hour galvanized soak section backup burner shall only use natural gas.

(c) The 2.05 MMBtu per hour preheater for the zinc pot equipment shall only use natural gas.

(d) The induction zinc premelt pot and induction zinc coating pot shall be heated by electricity.

(e) The 0.82 MMBtu per hour edge burners shall only use natural gas.

(f) The 4.1 MMBtu per hour galvanizing line dryer shall only use natural gas.

(g) The 6.0 MMBtu per hour chromate application system dryer shall only use natural gas.

(h) The 5.68 MMBtu per hour phosphate application with roll coater's dryer shall only use natural gas.

(i) The rust Preventive oils shall be applied to the metal strips electrostatically.

**Compliance Determination Requirements**

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within five years after the most recent stack test or 36 months after issuance of this Part 70 permit, whichever is later, in order to demonstrate compliance with Conditions D.4.1 and D.4.2, the Permittee shall perform PM and PM-10 testing for S17, and NOx testing for S18 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible components. Testing shall be conducted in accordance with Section C-Performance Testing.

D.4.5 Particulate Matter (PM) Control [326 IAC 2-2]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 24, and 326 IAC 2-2-3 (Best Available Control Technology), the alkaline cleaning baths and rinse tanks shall be enclosed and maintained under negative pressure.

D.4.6 Nitrogen Oxides (NOx) Control [326 IAC 2-2]

To control NOx emissions and:

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 24, and 326 IAC 2-2-3 (Best Available Control Technology), the 205.7 MMBtu/hr annealing and induction heating galvannealing furnace shall be controlled by a selective catalytic reduction control (SCR).

(b) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 38, and 326 IAC 2-2 (PSD), that upon startup, the selective catalytic reduction (SCR) system shall be operated at all times when the 205.7 MMBtu per hour annealing furnace is in operation.

D.4.7 Continuous Emissions Monitoring [326 IAC 3-5]

(a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) the continuous emission monitoring system for the selective catalytic reduction control (SCR) unit shall be calibrated, maintained, and operated for measuring NOx, thereby meeting the performance specifications of 326 IAC 3-5-2.

(b) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 39, and 326 IAC 2-2 (PSD), the Permittee shall continuously monitor and record NOx emissions from the SCR control unit. This activity shall be conducted in accordance with 326 IAC 3-5.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.4.8 Visible Emissions Notations

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 13, and A147-11471-00041, issued April 18, 2002, and 326 IAC 2-2 (PSD), visible emission notations of the stack exhaust S17 shall be performed. These notations shall be performed once per day during daylight hours when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, notations shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.

(d) A trained employee, including trained personnel under contract with the source, is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a violation of this permit.

D.4.9 Parametric Monitoring for Scrubber

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, A147-11471-00041, issued April 18, 2002, and 326 IAC 2-2 (PSD), the Permittee shall record the pressure drop and scrubbing liquid flow rate of scrubber S17 at least once per day when the process is in operation. When for any one reading, the pressure drop across the scrubber is outside its normal range, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions and Exceedances. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a violation of this permit.

The instruments used for determining the pressure drop, and scrubbing liquid flow rate at the inlet of the control device shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(b) The gauge employed to take the pressure drop across the scrubber shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within 0.25% (or ±5 digits at 22 degrees Celsius) of full scale reading for S17. The instrument shall be quality assured and maintained as specified by the vendor.

D.4.10 Scrubber Inspections

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, and 326 IAC 2-2 (PSD), an inspection shall be performed each calendar quarter of the scrubber. Inspections required by this condition shall not be performed in consecutive months. Defective scrubber components shall be replaced.

D.4.11 Scrubber Failure

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, and 326 IAC 2-2 (PSD), in the event that failure of the scrubber has been observed:

(a) The process associated with the affected unit will be shut down immediately until the failed unit has been repaired or replaced.

(b) Based upon the findings of the inspection, or any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.4.12 Selective Catalytic Reduction System Inspection

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 38(c), and 326 IAC 2-2 (PSD), an inspection shall be performed each calendar quarter of the SCR. Inspections required by this condition shall not be performed in consecutive months. Defective SCR components shall be replaced.

D.4.13 Selective Catalytic Reduction System Failure

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 38(d), and 326 IAC 2-2 (PSD), in the event that the SCR's failure has been observed:

(a) The affected unit will be shut down immediately until the failed unit has been repaired or replaced.

(b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.4.14 Continuous Emission Monitoring

The Permittee shall calibrate, maintain, certify, and operate the continuous monitoring system for the measurement of the $NO_X$ emissions discharged into the atmosphere from S18 in accordance with 326 IAC 3-5-2 and 3-5-7.

(a) The continuous emission monitoring system (CEMS) shall measure $NO_X$ emission rates in pounds per hour. The use of CEMS to measure and record the $NO_X$ hourly emission rates over a three (3) hour operating block averaging period is sufficient to demonstrate compliance with the limitations established in condition D.4.2. The source shall maintain records of emission rates in pounds per hour.

(b) The Permittee shall demonstrate compliance with Condition D.4.2 utilizing data from the $NO_X$ CEMS, the fuel flow meter, and Method 19 calculations.

D.4.15 NOx Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)]

Whenever the NOx continuous emission monitoring system is malfunctioning or down for repairs or adjustments, the following method shall be used to provide information related to NOx emissions:

Monitoring of the SCR operating parameters for ammonia flow rate and inlet duct temperature, shall be implemented. The parameters are as follows:

(a) The Permittee shall record the ammonia flow rate and inlet duct temperature at least four (4) times per hour until the primary CEM or a backup CEM is brought online and functioning properly. The Preventive Maintenance Plan for the SCR shall contain troubleshooting contingency and corrective actions for when the readings are outside of the normal range for any one reading during downtime of the NOx CEMS. When for any one reading, the ammonia flow rate and inlet duct temperature are outside the normal range during downtime of the NOx CEMS, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances.

(b) The instrument used for determining the ammonia flow rate and inlet duct temperature shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a violation of this permit.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.4.16 Record Keeping Requirements

(a) To document compliance with condition D.4.2, the Permittee shall maintain records of the emission rates of $NO_X$ in pounds per hour.

(b) To document compliance with condition D.4.8, the Permittee shall maintain records of visible emission notations for stack S17.

(c) To document compliance with condition D.4.9, the Permittee shall maintain once per day records of the pressure drop and flow rate during normal operation when exhausting to the atmosphere.

(d) To document compliance with condition D.4.10, and pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, and 326 IAC 2-2 (PSD), a record shall be kept of the results of the inspection and the number of scrubber components replaced.

(e) To document compliance with condition D.4.12, and pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 38(c), and 326 IAC 2-2 (PSD), a record shall be kept of the results of the inspection and the number of SCR components replaced.

(f) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 38(f), and 326 IAC 2-2 (PSD), records for the SCR shall be kept and made available upon request to the Office of Air Quality (OAQ).

(g) To document compliance with condition D.4.14, the Permittee shall record the output of the CEM

system and shall perform the required record keeping and reporting in accordance with 326 IAC 3-5-6 and 326 IAC 3-5-7, respectively.

(h) To document compliance with condition D.4.15, the Permittee shall record the ammonia flow rate and inlet duct temperature of the SCR at least four (4) times per hour until the primary CEMS or a backup CEMS is brought online.

(i) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

D.4.17 Reporting Requirements

(a) Pursuant to Construction Permit Amendment 147-10751-00041, issued March 4, 1999, and 326 IAC 2-2 (PSD), a written report of excess emissions measured by the continuous emissions monitor shall be submitted each calendar quarter to the addresses listed in Section C- General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. Pursuant to 326 IAC 3-5-7, the averaging periods used to determine excess emissions shall be three hour block periods ending at 03:00, 06:00, 09:00, 12:00, 15:00, 18:00, 21:00, and 24:00. The excess emissions report shall consist of the following:

(1) A description of the nature and cause of the excess emissions, if known.

(2) The date and time identifying each period during which the continuous monitoring system was inoperative or malfunctioning, except for zero and span checks, and the nature of the system repair or adjustments.

(3) When no excess emissions have occurred and the continuous monitoring system has not been inoperative, repaired, or adjusted.

(b) The report described in part (a) of this condition as submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

**SECTION D.5 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:

(f) A Roll Repair Shop consisting of:

(1) Two (2) electrolytic chrome dip tanks, identified as 1 East and 1 West constructed in 1998, rated at 36 tons per hour steel rolls each, or 5.5 gallons per hour chromium solution, with both exhausting through a mesh pad mist elimination system to Stack S15.

(2) One (1) electrodischarge texturing machine exhausting through a baghouse to the interior of the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.5.1 Particulate Matter (PM) Best Available Control Technology (BACT) [326 IAC 2-2]

(a) That pursuant to 326 IAC 2-2-3 (Best Available Control Technology), and Construction Permit Amendment 147-9557-00041, issued May 6, 1998, operation condition 27, the particulate matter generated, measured as chromium, from the electrolytic chrome dip tanks located in the roll repair shop shall be controlled by a mesh pad mist elimination system. The outlet grain loading shall not exceed 6.6 x $10^{-6}$ grains/dscf.

(b) That pursuant to 326 IAC 2-2-3 (Best Available Control Technology), Construction Permit Amendment 147-9557-00041, issued May 6, 1998, operation condition 29, and A147-11471-00041, issued April 18, 2002, the particulate matter generated from the electrodischarge texturing machine located in the roll repair shop shall be controlled by a baghouse. The outlet grain loading shall not exceed 0.002 grains per dscf. The particulate matter emissions from the baghouse exhaust shall not exceed 0.012 pounds per hour.

D.5.2 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N. The Permittee shall comply with the requirements of this condition on and after the compliance date for the tanks.

(b) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 19, and Amendment 147-11471-00041, issued April 18, 2002, and 326 IAC 2-2 (PSD), the emissions of hazardous air pollutants from the entire source shall be less than 10 tons per 365 day period for any individual HAP and 25 tons per 365 day period of any combination of HAPs.

D.5.3 Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to the electrolytic chrome dip tanks. The Permittee shall comply with the requirements of this condition on and after the compliance date for the tank.

D.5.4 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]

(a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.

(b) The hard chromium electroplating tank, identified as 1 East and 2 West above, is considered a large, new hard chromium electroplating operation. During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the tank by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.015 mg/dscm [6.6x$10^{-6}$ gr/dscf].

D.5.5 Work Practice Standards [40 CFR 63.342(f)]

The following work practice standards apply to the electrolytic chrome dip tanks:

(a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain the tanks, composite mesh-pad, the mesh pad mist elimination system (S15) and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.5.6.

(b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.5.6.

(c) These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.

(d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.

(e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAQ may require that the Permittee make changes to the OMP required by Condition D.5.6. Revisions may be required if IDEM, OAQ finds that the plan:

(1) Does not address a malfunction or period of excess emissions that has occurred;

(2) Fails to provide for the operation of the electrolytic chrome dip tanks, the composite mesh-pad, or the mesh pad mist elimination system and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or

(3) Does not provide adequate procedures for correcting malfunctioning process equipment, composite mesh-pad, monitoring equipment or other causes of excess emissions as quickly as practicable.

For the electrolytic chrome dip tanks, the Permittee shall comply with the requirements of this condition on and after the start-up date of each tank.

The work practice standards that address operation and maintenance must be followed during malfunctions and periods of excess emissions.

D.5.6 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

(a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of the electrolytic chrome dip tanks. The OMP shall specify the operation and maintenance criteria for the tanks, the composite mesh-pad, the mesh pad mist elimination system and monitoring equipment and shall include the following elements:

(1) For the composite mesh-pad system (CMP):

(A) Quarterly visual inspections of the device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.

(B) Quarterly visual inspection of the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.

(C) Quarterly visual inspection of the duct work from the tank to the control device to ensure there are no leaks.

(D) Perform washdown of the composite mesh-pads in accordance with manufacturers recommendations.

(2) A standardized checklist to document the operation and maintenance criteria for the electrolytic chrome dip tanks, the air pollution control device, the add-on air pollution control device and the monitoring equipment.

(3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur.

(4) A systematic procedure for identifying malfunctions and periods of excess emissions of the electrolytic chrome dip tanks, the air pollution control device, the add-on air pollution control device and monitoring equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.

(b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in this condition as the OMP, provided the alternative plans meet the above listed criteria in Condition D.5.6(a).

(c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining the electrolytic chrome dip tanks, the air pollution control device, the add-on air pollution control device and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.

(d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ.

(e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ for the life of the electrolytic chrome dip tanks or until the tanks are no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAQ for a period of five (5) years after each revision to the plan.

**Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]**

D.5.7 Performance Testing [326 IAC 2-1.1-1][326 IAC 2-7-6(1)][40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

(a) A performance test demonstrating initial compliance for tanks 1 and 2 was performed on January 20, 1999.

During the initial performance test conducted on January 20, 1999, it was determined that the average pressure drop across the composite mesh pad system was 4.0 inches of water and the average outlet chromium concentration is 0.00336 mg/dscm.

(b) The Permittee is not required to further test the electrolytic chrome dip tanks by this permit. However, the IDEM may require testing when necessary to determine if the tanks are in compliance. If testing is required by the IDEM, compliance with the limit specified in Conditions D.5.1(a) and D.5.4 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

(c) Any change, modification, or reconstruction of the electrolytic chrome dip tanks, the composite mesh-pad, the mesh pad mist elimination system or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

D.5.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 63.343(c)]

(a) Pursuant to 40 CFR 63.343(c)(1)(ii), when using a composite mesh-pad system to comply with the limit specified in Condition D.5.4, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day when a hard chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant values for pressure drop established during multiple

performance tests.

(b) Tank operation or operating time is defined as that time when a part is in the tank and the rectifier is turned on. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts is considered operating time.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.5.9 Record Keeping Requirements [326 IAC 2-7-5(3)] [40 CFR 63.346]

The Permittee shall maintain records to document compliance with Conditions D.5.1, D.5.2 and D.5.3. These records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit and include a minimum of the following:

(a) Inspection records for the composite mesh-pad system, the mesh pad mist elimination system and monitoring equipment to document that the inspection and maintenance required by Condition D.5.6 has taken place. The record can take the form of a checklist and should identify the following:

(1) The device inspected;

(2) The date of inspection;

(3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and

(4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.

(b) Records of all maintenance performed on the electrolytic chrome dip tanks, the mist elimination system and monitoring equipment.

(c) Records of the occurrence, duration, and cause (if known) of each malfunction of the electrolytic chrome dip tanks, the composite mesh-pad system and monitoring equipment.

(d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of the electrolytic chrome dip tanks, the composite mesh-pad system and monitoring equipment as indicated by monitoring data collected in accordance with this condition.

(e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.

(f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.

(g) Test reports documenting results of all performance tests.

(h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.

(i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.

(j) The total process operating time, as defined in Condition D.5.7(b), of each tank, during the reporting period.

(k) Records of the actual cumulative rectifier capacity of each hard chromium electroplating tank expended during each month of the reporting period, and the total capacity expended to date for a reporting period.

(l) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart

A, General Provisions) and by Condition D.5.9.

D.5.10 Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347]

The notifications and reports required in this section shall be submitted to IDEM, OAQ using the address specified in Section C - General Reporting Requirements.

(a) Notifications:

(1) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.

(A) The NCS shall be submitted to IDEM, OAQ, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).

(B) The NCS for tanks 1 and 2 shall be submitted to IDEM, OAQ no later than forty-five (45) days following completion of the compliance demonstration pursuant to Section C - Performance Testing.

(2) Notification of Construction or Reconstruction
Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ. In addition, the Permittee may not change, modify, or reconstruct the electrolytic chrome dip tanks without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ.

(A) The NCR shall contain the information identified in 40 CFR 63.345(b)(2) and (3).

(B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device [i.e., the addition of duct work to the CMP system].

(C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct the electrolytic chrome dip tank serves as this notification.

(D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAQ before construction, modification, or reconstruction may commence.

(b) Performance Test Results
The Permittee shall document results from any future performance tests in a complete test report that contains the information required in 40 CFR 63.344(a).

The Permittee shall submit reports of performance test results as part of the Notification of Compliance Status, described in 40 CFR 63.347(e), no later than forty-five (45) days following the completion of the performance test.

(c) Ongoing Compliance Status Report
The Permittee shall prepare summary reports to document the ongoing compliance status of the electrolytic chrome dip tanks using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tank RRS is located at a site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAQ upon request.

(1) The Ongoing Compliance Status Report shall be completed according to the following schedule except as provided in paragraphs (c)(2).

(A) The first report shall cover the period from the issuance date of this permit to

December 31 of the year in which the permit is issued.

(B) Following the first year of reporting, the report shall be completed on a calendar year basis with the reporting period covering from January 1 to December 31.

(2) If both of the following conditions are met, semiannual reports shall be prepared and submitted to IDEM, OAQ:

(A) The total duration of excess emissions [as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)] is one percent (1%) or greater of the total operating time as defined in Condition D.5.7(b) for the reporting period; and

(B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time as defined in Condition D.5.7(b).

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted semiannually until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

(3) IDEM, OAQ may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the report required of (c)(2) above shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source.

**SECTION D.6 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:

(g) Ancillary Equipment, as follows;

(1) Hydrogen batch annealing with fifteen (15) natural gas-fired furnaces with low-NOx burners rated at 6.75 MMBtu/hr exhausting through the roof vent system in building 500;

(2) Space heaters and air make-up units with each unit limited to no more than 5.2 MMBtu per hour and a combined rating limited to no more than 251 MMBtu/hr;

(3) Two (2) non-contact cooling towers with mist drift eliminators exhausting to the atmosphere;

(4) Storage tanks for HCl, nitric acid, and HF exhausting through a fume scrubber to Stack S04 consisting of:

(A) One (1) HF acid tank with a capacity of 20,000 gallons;
(B) One (1) nitric acid tank with a capacity of 20,000 gallons;
(C) Three (3) waste acid tanks, each with a capacity of 40,000 gallons, or 120,000 gallons combined;
(D) Three (3) HCl/ra acid tanks, each with a capacity of 20,000 gallons, or 60,000 gallons combined; and
(E) Two (2) CPL waste acid tanks, each with a capacity of 20,000 gallons, or 40,000 gallons combined.

(5) Miscellaneous storage tanks at the continuous cold mill (CCM) operation not to exceed an overall capacity of 353,000 gallons, consisting of:

(A) Two (2) Morgoil System 2 tanks, No1 and No.2, each with a capacity of 18,500 gallons, or 37,000 gallons combined;
(B) One (1) CCM gear lube tank, with a capacity of 13,500 gallons;
(C) One (1) base oil storage tank, with a capacity of 10,000 gallons;
(D) One (1) direct oil tank, with a capacity of 4,000 gallons;
(E) Two (2) Emulsion tanks, No.1 and No.2, each with a capacity of 88,000 gallons, or 176,000 gallons combined; and
(F) Two (2) Emulsion tanks, No.3 and No.4, each with a capacity of 44,000 gallons, or 88,000 gallons combined;

(6) Miscellaneous storage tanks at the temper mill operation not to exceed an overall capacity of 131,000 gallons, consisting of:

(A) One (1) direct oil application tank, with a capacity of 4,000 gallons;
(B) Three (3) temper mill tanks, TM1-UZ203, LSL-01, 02, and 03, each with a capacity of 10,000 gallons, or 30,000 gallons combined;
(C) One (1) base oil tank, with a capacity of 8,000 gallons;
(D) One (1) solution tank, with a capacity of 3,200 gallons;
(E) One (1) gear lube tank, TM-1-P-2084, with a capacity of 2,100 gallons; and
(F) Two (1) Morgoil tanks, TM-1-P-2000 and 99, each with a capacity of 5,300 gallons, or 10,600 gallons combined.

(7) Miscellaneous oil storage tanks for the continuous galvanizing line (CGL) not to exceed an overall capacity of 16,250 gallons, consisting of:

(A) One (1) tank, GL1-PGOL-TNK-01, with a capacity of 6,000 gallons; and
(B) Three (3) tanks, GL1-PGOL-TNK-02, 03, and 04, each with a capacity of 3,000 gallons, or 9,000 gallons combined.

(8) A miscellaneous oil storage tank for the continuous pickling line (CPL), consisting of one (1) CPL pickling tank, with a capacity of 15,000 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.6.1 State Construction and Operating Permit: Construction Permit [326 IAC 2-1.1]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 33, and pursuant to 326 IAC 2-1.1 (State Construction and Operating Permit: Construction Permit), the space heaters and air make-up units shall be limited as follows:

(a) each unit shall burn only natural gas,

(b) each unit may vary in size up to a maximum of 5.2 MMBtu per hour and shall not exceed a total combined capacity of 251 MMBtu per hour, and

(c) space heater operations utilizing natural gas shall be restricted to the months of October through April.

D.6.2 Particulate Matter (PM) Best Available Control Technology (BACT) [326 IAC 2-2]

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 34, and pursuant to 326 IAC 2-2-3 (Best Available Control Technology), the mist from the two (2) non-contact cooling towers shall be controlled by drift eliminators and exhausted to the atmosphere. The drift losses from each of the cooling towers shall not exceed 0.005% of cooling water.

(b) Pursuant to 326 IAC 2-2-3 (Best Available Control Technology), Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 35, the storage tanks for CPL HCl, nitric acid, and HF shall be controlled by a fume scrubber system. The outlet grain loading from the scrubber shall not exceed 0.0066 grains per dscf. The particulate matter emissions from Stack S04 shall not exceed 0.0967 pounds per hour.

D.6.3 Nitrogen Oxides (NOx) Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 26, and pursuant to 326 IAC 2-2-3 (Best Available Control Technology), the outlet NOx loading from the fifteen (15) 6.75 MMBtu per hour hydrogen batch annealing furnaces shall not exceed 0.1 pounds per MMBtu. The nitrogen oxide emissions shall not exceed 9.45 pounds per hour.

**Compliance Determination Requirements**

D.6.4 Nitrogen Oxides (NOx) Control [326 IAC 2-2]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 26, and pursuant to 326 IAC 2-2-3 (Best Available Control Technology), the fifteen (15) 6.75 MMBtu per hour hydrogen batch annealing furnaces shall use only natural gas and shall be equipped with low-NOx burners.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.6.5 Parametric Monitoring for Scrubber

(a) Pursuant to A147-11471-00041, issued April 18, 2002 and 326 IAC 2-2 (PSD), the Permittee shall record the pressure drop and scrubbing liquid flow rate of scrubber S04 at least once per day when the process is in operation. The process operation occurs each time material is being added to or taken from the tanks controlled by scrubber S04. When for any one reading, the pressure drop across the scrubber, or the pH of the scrubbing liquid is outside its normal range, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Response to Excursions and Exceedances. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a violation of this permit.

The instruments used for determining the pH of the scrubbing liquid, pressure drop, and scrubbing liquid flow rate at the inlet of the control device shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(b) The gauge employed to take the pressure drop across the scrubber shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within ±2% of full scale reading for S04. The instrument shall be quality assured and maintained as specified by the vendor.

D.6.6 Scrubber Inspections

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, an inspection shall be performed each calendar quarter of the scrubber (S04). Inspections required by this condition shall not be performed in consecutive months. Defective scrubber components shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber components replaced.

D.6.7 Scrubber Failure

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, in the event that failure of a scrubber (S04) has been observed:

(a) The process associated with the affected unit will be shut down immediately until the failed unit has been repaired or replaced.

(b) Based upon the findings of the inspection, or any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.6.8 Record Keeping

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 36, and pursuant to 326 IAC 12 and 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Storage Vessels for Petroleum Liquids), the owner or operator of all storage vessels shall keep readily accessible records of the tank dimensions and tank capacity.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

**SECTION D.7 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:

(h) Rolling oils, rust preventative oils, and prelube oils.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.7.1 Volatile Organic Compounds (VOC) Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 20, and 326 IAC 2-2-3 (Best Available Control Technology), the volatile organic compound (VOC) emissions of the various oils shall meet the following:

(a) the VOC content of any rolling oil employed shall not exceed 6.9 pounds of VOC per gallon of oil, excluding water and exempt solvents;

(b) the VOC content of any rust Preventive oil employed shall not exceed 3.3 pounds of VOC per gallon of oil, excluding water and exempt solvents; and

(c) the VOC content of any prelube oil employed shall not exceed 0.8 pounds of VOC per gallon of oil, excluding water and exempt solvents.

D.7.2 Hazardous Air Pollutants (HAPs) Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 20, and 326 IAC 2-2-3 (Best Available Control Technology), the volatile organic compound (VOC) emissions of the various oils shall contain no hazardous air pollutants (HAPs) as defined in 326 IAC 14-1-2 and 40 CFR 61.02 and 61.03.

D.7.3 Surface Coating Emission Limitations [326 IAC 8-2-1]

Pursuant to 326 IAC 8-2-4 (Coil Coating Operations) part (b), after December 31, 1985, no owner or operator of a coil coating line may cause, allow, or discharge into the atmosphere of any volatile organic compounds in excess of 0.31 kilograms per liter of coating (2.6 pounds per gallon) excluding water.

**Compliance Determination Requirements**

D.7.4 VOC and HAPs

Material Safety and Data Sheets shall be kept on site by the Permittee for the various oils to show compliance with Conditions D.7.1, D.7.2 and 7.3.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.7.5 Record Keeping Requirements

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

**SECTION D.8 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:

(i) Process boilers consisting of:

(1) North Boilers: Two (2) natural gas-fired boilers with ultra low-NOx burners, constructed in 1998, each rated at 76.0 MMBtu/hr heat input, exhausting to Stack S03.

(2) South Boilers: Two (2) natural gas-fired boilers with ultra low-NOx burners, constructed in 1998, each rated at 76.0 MMBtu/hr heat input, exhausting to Stack S20.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.8.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a)(Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(d)), particulate emissions from all facilities used for indirect heating purposes which were constructed after September 21, 1983, shall not exceed 0.25 pounds of particulate matter per million British thermal units heat input as established by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt= Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q= Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr).

For the facilities exhausting to Stacks S03 and S20, Q equals 304 MMBtu per hour heat input.

D.8.2 Nitrogen Oxides (NOx) Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to Significant Source Modification 147-19502-00041, issued August 5, 2005:

(a) The two 76.0 MMBtu pack age boilers (known as the North Boilers) shall use only natural gas and shall be equipped with ultra low NOx burners. The total outlet nitrogen oxide loading from each individual boiler shall not exceed 0.04 pounds per MMBtu. The nitrogen oxide emissions from Stack S03 shall not exceed 3.04 pounds per hour from each individual boiler.

(b) The two 76.0 MMBtu package boilers (known as the South Boilers) shall use only natural gas and shall be equipped with ultra low NOx burners. The total outlet nitrogen oxide loading from each individual boiler shall not exceed 0.04 pounds per MMBtu. The nitrogen oxide emissions from Stack S20 shall not exceed 3.04 pounds per hour from each individual boiler.

D.8.3 Particulate Matter (PM), Carbon Monoxide (CO), and Volatile Organic Compounds (VOC) Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to the Technical Support Document for Construction Permit 147-6713-00041, issued February 13, 1997, and 326 IAC 2-2-3 (Best Available Control Technology), the North and South boilers shall only combust natural gas as BACT for PM, CO, and VOC.

**Compliance Determination Requirements**

D.8.4 Particulate Matter

In order to demonstrate compliance with condition D.8.1, the boilers shall only combust natural gas as fuel.

D.8.5 Nitrogen Oxides

The ultra low-NOx burners for each boiler shall be operating at all times the boilers are in operation.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.8.6 Record Keeping Requirements

(a) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 32, 326 IAC 2-2 (PSD), 326 IAC 12, and 40 CFR Part 60.40c, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating units), the natural gas usage of the four (4) 76.0 MMBtu per hour package boilers shall be recorded and maintained as required in NSPS 60.48c(g).

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.

D.8.7 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.8.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

**SECTION D.9 FACILITY OPERATION CONDITIONS - Insignificant Activities**

**Air Liquide Industrial, U.S.L.P.**

Facility Description [326 IAC 2-7-5(15)]: This industrial gas production plant consists of the following:

(a) One (1) hydrogen generator using natural gas as feedstock, maximum input capacity of 6.24 MMBtu/hr;

(b) One (1) cooling tower, maximum capacity of 3,700 gallons per minute; and

(c) One (1) natural gas fired emergency generator, maximum capacity of 80 KVA, with natural gas consumption rate of 1,138 cuft per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.9.1 Nitrogen Oxides (NOx)

Any change or modification which may increase the potential nitrogen oxides emissions to 10 tons per year or more from this process must be approved by the Office of Air Quality (OAQ) before such a change may occur.

D.9.2 Insignificant Thresholds [326 IAC 2-7-1]

Pursuant to 326 IAC 2-7-1(21), to remain an insignificant activity, the potential uncontrolled emissions of the industrial gas production plant shall be less than the following:

Lead (Pb)= 0.6 ton/year or 3.29 lbs/day
Sulfur Dioxide (SO2)= 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOx)= 5 lbs/hour or 25 lbs/day
Carbon Monoxide (CO)= 25 lbs/day
Particulate Matter (PM)= 5 lbs/hour or 25 lbs/day
Volatile Organic Compounds (VOC)= 3 lbs/hour or 15 lbs/day

**SECTION D.10 FACILITY OPERATION CONDITIONS- Insignificant Activities**

**Precision Strip, Inc.**

Facility Description [326 IAC 2-7-5(15)]: A steel coil slitting operation consisting of:

(a) One (1) backup electrostatic oiler, with a maximum capacity of 123.2 pounds per hour oil, not to exceed 15% of Precision Strip's total operation.

(b) Mechanical cold rolled steel coil slitting operation, rated at 176,000 pounds per hour coiled steel, using various oils, with no emissions.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.10.1 Surface Coating Emission Limitations [326 IAC 8-2-1]

Pursuant to 326 IAC 8-2-4 (Coil Coating Operations) part (b), after December 31, 1985, no owner or operator of a coil coating line may cause, allow, or discharge into the atmosphere of any volatile organic compounds in excess of 0.31 kilograms per liter of coating (2.6 pounds per gallon) excluding water.

D.10.2 Usage Limit

Pursuant to Amendment 147-9787-00050, issued October 2, 1998, the electrostatic oiler shall only be operated as a back-up unit in the event that any of AK Steel's electrostatic oilers, which were properly permitted under CP 147-6713-00041, breaks down or if steel coils produced by AK Steel need to be re-oiled after they have been slit per customer request. This electrostatic oiling shall not exceed 15 percent of Precision Strip's total operation.

D.10.3 VOC

Pursuant to 326 IAC 2-7-1(21), to remain an insignificant activity, the potential uncontrolled VOC emissions of this steel coil slitting operation shall be less than 3 lbs/hour or 15 lbs/day.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.10.4 Record Keeping Requirements

(a) Precision Strip, Inc., shall keep production records for the back-up electrostatic oiler on site and available at all times to show compliance with condition D.10.1, D.10.2 and D.10.3.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE BRANCH

## PART 70 OPERATING PERMIT
## CERTIFICATION

Source Name: AK Steel Corporation, Rockport Works
Source Address: 6500 North U.S. 231, Rockport, Indiana, 47635
Mailing Address: Same
Part 70 Permit No.: T147-11043-00041

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)
- ☐ Report (specify)
- ☐ Notification (specify)
- ☐ Affidavit (specify)
- ☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY

**COMPLIANCE BRANCH**
**100 North Senate Avenue**
**Indianapolis, Indiana 46204-2251**
**Phone: 317-233-0178**
**Fax: 317-233-6865**

## PART 70 OPERATING PERMIT
## EMERGENCY OCCURRENCE REPORT

Source Name: AK Steel Corporation, Rockport Works
Source Address: 6500 North U.S. 231, Rockport, Indiana, 47635
Mailing Address: Same
Part 70 Permit No.: T147-11043-00041

**This form consists of 2 pages** **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

If any of the following are not applicable, mark N/A **Page 2 of 2**

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N<br>Describe:<br><br>Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## PART 70 OPERATING PERMIT
## CHROMIUM ELECTROPLATING AND ANODIZING NESHAP
## ONGOING COMPLIANCE STATUS REPORT

| | |
|---|---|
| Source Name: | AK Steel Corporation, Rockport Works |
| Source Address: | 6500 North U.S. 231, Rockport, Indiana, 47635 |
| Mailing Address: | Same |
| Part 70 Permit No.: | T147-11043-00041 |
| Tank ID #: | The electrolytic chrome dip tank |
| Type of process: | Hard Chrome |
| Monitoring Parameter: | Pressure drop across the composite mesh pad system during tank operation |
| Parameter Value: | ±1 inch of pressure drop value established during initial performance test, or within the range of compliant values for pressure drop established during multiple performance tests |
| Limits: | Total chromium emissions may not exceed 0.0000066 grains per dscf pursuant to 40 CFR 63.342(c)(1)(i) |

This form is to be used to report compliance for the Chromium Electroplating and Anodizing NESHAP only.
The frequency for completing this report may be altered by IDEM, OAQ, Compliance Branch.

***Companies classified as a major source:*** ***Submit this report no later than 30 days after the end of the reporting period.***

**This form consists of 2 pages** **Page 1 of 2**

| |
|---|
| BEGINNING AND ENDING DATES OF THE REPORTING PERIOD: |
| TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD: |

| **MAJOR AND AREA SOURCES: CHECK ONE** | |
|---|---|
| ☐ | NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD. |
| ☐ | THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING). |

**AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY**:
IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.

| | | | |
|---|---|---|---|
| JAN | APR | JUL | OCT |
| FEB | MAY | AUG | NOV |
| MAR | JUN | SEP | DEC |

**HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY:**
LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.

| | | | |
|---|---|---|---|
| JAN | APR | JUL | OCT |
| FEB | MAY | AUG | NOV |
| MAR | JUN | SEP | DEC |

# CHROMIUM ELECTROPLATING AND ANODIZING NESHAP ONGOING COMPLIANCE STATUS REPORT (CONTINUED)

ATTACH A SEPARATE PAGE IF NEEDED **Page 2 of 2**

| |
|---|
| IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT: |
| DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT: |
| ADDITIONAL COMMENTS: |

**ALL SOURCES: CHECK ONE**

☐ I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

☐ THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

Submitted by:
Title/Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## PART 70 OPERATING PERMIT
## QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: AK Steel Corporation, Rockport Works
Source Address: 6500 North U.S. 231, Rockport, Indiana, 47635
Mailing Address: Same
Part 70 Permit No.: T147-11043-00041

**Months:** _____ **to** _____ **Year:** _____



This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management
# Office of Air Quality

## Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: AK Steel Corporation
Source Location: 6500 North U.S. 231, Rockport, Indiana 47635
County: Spencer
SIC Code: 3312
Operation Permit No.: T147-11043-00041
Permit Reviewer: Melissa Groch

On October 30, 2003, the Office of Air Quality (OAQ) had a notice published in the Journal Democrat, Rockport, Indiana, stating that AK Steel Corporation had applied for a Part 70 Operating Permit to operate a stationary steel coil finishing plant with ancillary equipment. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of sixty (60) days to provide comments on whether or not this permit should be issued as proposed. On March 30, 2004, OAQ held a public hearing and accepted additional comments on the proposed permit. Additionally, the comment period to submit written comments was extended through March 30, 2004.

Written comments were received during this comment period and at the public hearing. IDEM has addressed each one of these written comments in this document. In some instances, permit language has been added or deleted as a result of the comments. Added language is shown in bold font and language with strikeout font has been deleted.

**WRITTEN COMMENTS**

On December 29, 2003, and on June 23, 2006, AK Steel submitted the following written comments:

**Comment 1:** Increased Monitoring and Recordkeeping Costs
As discussed in the applicable sections below, the new monitoring and recordkeeping requirements of the draft Title V permit would result in an increase in costs to AK Steel of nearly $100,000 per year. This increase in total costs from the requirements of the draft Title V permit is a result of $50,000 for increased visible emission monitoring, $15,000 for increased baghouse parametric monitoring, $15,000 for increased scrubber parametric monitoring, and $15,000 for increased recordkeeping. Due to the extensive monitoring and recordkeeping already in place in the construction permit, an increase in monitoring and recordkeeping expenses of nearly $100,000 per year is excessive. As such, in the places identified below, AK Steel requests that IDEM remove these increased monitoring and recordkeeping requirements from the Title V permit and simply maintain the existing monitoring and recordkeeping requirements from the construction permit.

**Response 1:** Upon further review, IDEM has determined that most of the monitoring requirements from the initial construction permit are sufficient. As noted throughout this document, unless otherwise specified, these requirements now reflect the frequency of monitoring that was found in the original permit.

**Comment 2:** NSR Clean Units Designations
Please note that AK Steel intends to pursue Clean Units designations for applicable sources once IDEM promulgates the new NSR rules. For that reason, AK Steel encourages IDEM to promulgate the Clean Unit rules as soon as possible.

**Response 2:** Rule 326 IAC 2-2.2 is titled “Clean Unit Designations in Attainment Areas”. It was final adopted by the Air Pollution Control Board on June 2, 2004. This state NSR Reform rulemaking became effective on September 9, 2004. On June 24, 2005, the clean unit provisions were remanded at the federal level.

**Comment 3:** AK Steel is uncertain where the “Insignificant activity” information should be included in Section A (Source Summary) of the Title V permit. We are including this information here for your inclusion into the permit.

Following is a listing of “Insignificant activity” sources as defined in 326 IAC 2-7-1 Sec. 1 (21) and further identified by appropriate citation:

**(D) Emissions from a laboratory as defined in this clause.**

- 3 Chemical - process testing laboratories, located on the APL, CPL, and Roll Shop.
- 1 Process sample testing laboratory located at the WWTP.
- 1 Process sample testing laboratory located at the Fluids Manager complex.
- 1 Steel sample physical laboratory and fume hood located in the CGL

**(G) Any of the following listed activities:**

(ii) Fuel dispensing activities, including the following:
- (AA) 1 gasoline fuel transfer dispensing operation, handling less than 1,300 gal/day, with storage tank capacity of 1,100 gallons.
- (BB) 1 petroleum fuel other than gasoline dispensing operation, handling less than 3,500 gal/day, with storage tank capacity of 1,100 gallons.

(vi) Production related activities, including the following:
- (BB) 4 roll grinders, wherein cutting coolant continuously floods the machining interface, located in the roll repair shop.
- (CC) 1 soapy water bearing washer/degreasing operation with a capacity of approximately 50 gallons, located in the roll repair shop.
- (DD) one (1) waste water treatment plant for treatment of process waste water.

(vii) Activities associated with the following recovery systems:
- (AA) 4 rolling oil circulation and recovery systems, located in the CCM Emulsion Room.

(x) Repair activities, including the following:
- (AA) Repair of baghouses, mist eliminators and scrubbers.
- (BB) Cleaning of APL cooling tower.
- (CC) Changeover from carbon to stainless and vice versa at the CPL.

(xviii) Flue gas conditioning systems and associated chemicals, such as the following:
- (BB) Ammonia is used in the deNOx system on the CGL Annealing Furnace.

(xix) Blowdown for the following:
- (BB) 4 natural gas boilers, listed in Section D.8, are equipped with automatic blowdown.
- (CC) 4 Cooling towers, listed as ancillary equipment or in specific processes, are equipped with automatic blowdown.

(xxii) Activities associated with emergencies, including the following:
- (BB) Emergency generators as follows:
  - (bb) Diesel Powered – 519 HP, located at Primary Substation
    Diesel Powered – 1109 HP, located at CGL
    Diesel Powered – 1180 HP, located at CCM
    Diesel Powered – 349 HP, located at TM
    Diesel Powered – 1039 HP, located at APL/CPL
    Diesel Powered – 1039 HP, located at Reservoir
    Diesel Powered – 235 HP, located at Reservoir - Fire

**Response 3:** Insignificant activities that have applicable rules are included in Section A of the operating permit. Also, depending on the rule, they may also be included in a Section D, specifically for insignificant activities. These are also listed in the Technical Support Document (TSD) with other insignificant activities that do not have rule applicability. Because the TSD is meant to reflect the Part 70 operating permit at the time of public notice, IDEM will not revise the TSD as a result of this comment. Since the Permittee wishes to add the above activities to their operating permit condition, the following has been added to the beginning of condition A.4:

**(a) This stationary source also includes the following insignificant activities, operated by AK Steel, which are not specifically regulated, as defined in 326 IAC 2-7-1(21):**

**(1) Emissions from a laboratory as defined in this clause.**

- **(A) Three (3) chemical – process testing laboratories: one each at the APL, CPL, and Roll Shop.**
- **(B) One (1) process sample testing laboratory located at the WWTP (Waste Water Treatment Plant).**
- **(C) One (1) process sample testing laboratory located at the Fluids Manager complex.**
- **(D) One (1) steel sample physical laboratory and fume hood located in the CGL.**

**(2) Fuel dispensing activities, including the following:**

- **(A) One (1) gasoline fuel transfer dispensing operation, handling less than 1,300 gal/day, with storage tank capacity of 1,100 gallons.**

**(B) One (1) petroleum fuel other than gasoline dispensing operation, handling less than 3,500 gal/day, with storage tank capacity of 1,100 gallons.**

**(3) Production related activities, including the following:**

**(A) Four (4) roll grinders, wherein cutting coolant continuously floods the machining interface, located in the roll repair shop.**
**(B) One (1) soapy water bearing washer/degreasing operation with a capacity of approximately 50 gallons, located in the roll repair shop.**
**(C) One (1) waste water treatment plant for treatment of process waste water.**

**(4) Activities associated with the following recovery systems: four (4) rolling oil circulation and recovery systems, located in the CCM Emulsion Room.**

**(5) Repair activities, including the following:**

**(A) Repair of baghouses, mist eliminators and scrubbers.**
**(B) Cleaning of APL cooling tower.**
**(C) Changeover from carbon to stainless and vice versa at the CPL.**

**(6) Flue gas conditioning systems and associated chemicals, such as the following: Ammonia is used in the deNOx system on the CGL Annealing Furnace.**

**(7) Blowdown for the following:**

**(A) Four (4) natural gas boilers, listed in Section D.8, are equipped with automatic blowdown.**
**(B) Four (4) cooling towers, listed as ancillary equipment or in specific processes, are equipped with automatic blowdown.**

**(8) Activities associated with emergencies, including the following emergency generators:**

**(A) Diesel Powered – 519 HP, located at Primary Substation**
**(B) Diesel Powered – 1109 HP, located at CGL**
**(C) Diesel Powered – 1180 HP, located at CCM**
**(D) Diesel Powered – 349 HP, located at TM**
**(E) Diesel Powered – 1039 HP, located at APL/CPL**
**(F) Diesel Powered – 1039 HP, located at Reservoir**
**(G) Diesel Powered – 235 HP, located at Reservoir - Fire**

**(b) This stationary source also includes the following insignificant activities, operated by on-site contractors, which are specifically regulated, as defined in 326 IAC 2-7-1(21):**

Because this condition now includes non-regulated insignificant activities, the condition's title now reads as:

~~Specifically Regulated~~ Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

**Comment 4:** A.1- General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
The P.O. Box is no longer a part of the address, and the general source phone number is (812)362-6144.

A.2- Part 70 Source Definition [326 IAC 2-7-1(22)]
Please add the following clarification [as bracketed] in the fourth paragraph:

"These two contractors are considered one source with AK Steel due to location, and reliance of at least 50 percent of [their business from] AK Steel."

**Response 4:** The mailing address and the general source phone number in Condition A.1 have each been changed to read as:

Mailing Address: ~~P.O. Box 45, Rockport, Indiana 47635~~ **Same**
General Source Phone Number: 812/362-61~~1~~**44**

The mailing addresses on the reporting forms have also been updated to reflect this change.

The requested change to A.2 has not been made because there have been new updates made to Section A. A reference to condition A.2 has been added to the second sentence of the first paragraph in Section A because condition A.2 is not federally enforceable. The second sentence now reads as:

> The information describing the source contained in conditions A.1, **A.2,** A.3, and A.4 is descriptive information and does not constitute enforceable conditions.

Two statements regarding common control between the primary operation and the supporting operation in condition A.2 have been deleted from the permit. This explanation was included in the TSD, and it is not necessary to include this in the operating permit itself. Additionally, a typo in a permit number has been corrected. As a result, the changes to the last three sentences of condition A.2 are as follows:

> ~~These two contractors are considered one source with AK Steel due to location, and reliance of at least 50 percent of AK Steel's business.~~
>
> ~~The term "source" in the Part 70 documents refers to the above two onsite contractors and AK Steel as one source.~~
>
> One document for the Part 70 operating permit will be issued to AK Steel. Air Liquide Industrial, U.S.L.P. and Precision Strip, Inc., are included in this document, Operating Permit No. 147-11043-0004~~7~~**1**.

**Comment 5:** A.3- Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]
A.3(a)(8)- There are "10" sections making up the sir quench, not "11".

A.3(a)(9)- There is only "1" water quench section, not "2".

A.3(a)(15)- Please change as follows:

> "skin pass temper mill and roll cleaning dust collection system exhausting through individual baghouses to S09C, and"

A.3(b)(3)- Please add the following distinction to the Continuous Pickling Line (CPL):

> (3) (a) when processing carbon steel only: three (3) HCl acid pickle and rinse tanks exhausting through a wet scrubber system to S02.
>
> (b) when processing stainless steels only: three (3) HCl acid pickle tanks exhausting through a wet scrubber system to S02; mixed acid and rinse tanks exhausting through a wet scrubber system to S02, through the electrolytic pickle scrubber system on the APL to S09A, and exhausting through the multi-stage oxidation/reduction and acid neutralization scrubbing system on the APL at S09B.

**Response 5:** A.3(a)(8) and (9) and their corresponding descriptions in Section D.1 have been changed as follows:

> (8) one (1) air quench station consisting of 1~~1~~**0** sections exhausting through a baghouse to Stack S08,
> (9) ~~two~~ **one** (~~2~~ **1**) water quench section~~s~~,

A.3(a)(15) has been changed as requested. Also, this change is reflected in the description box for Section D.1. They now both read as:

> skin pass temper mill **and roll cleaning dust collection system** exhausting through ~~a~~ **individual** baghouse**s** to **Stack** S09C, and

The first sentence of condition D.1.1(g) is also affected by this change. It has been revised and now reads as:

> Filterable particulate matter (PM/PM10) generated from the skin pass temper mill **and roll cleaning dust collection system** shall be controlled by ~~a~~ **individual** baghouse**s to a common Stack** (S09C).

IDEM agrees that the description for A.3(b)(3) can be more detailed. Therefore, the above suggestion has been added as (A) and (B). Because of this addition, the original (b)(3) has the following deletion:

> three (3) HCl acid pickle and rinse tanks~~ exhausting through a wet scrubber system to S02~~;
>
> **(A) when processing carbon steel only: three (3) HCl acid pickle and rinse tanks exhausting through a wet scrubber system to Stack S02;**

**(B) when processing stainless steels only: three (3) HCl acid pickle tanks exhausting through a wet scrubber system to Stack S02; mixed acid and rinse tanks exhausting through a wet scrubber system to Stack S02, through the electrolytic pickle scrubber system on the APL to Stack S09A, and exhausting through the multi-stage oxidation/reduction and acid neutralization scrubbing system on the APL at Stack S09B.**

This change has also been made to the corresponding description in Section D.2.

Because of numerous inconsistencies found in the wording used for the descriptions in this permit, minor revisions have been made for clarification. Additionally, these changes are reflected in the corresponding Section D for each. These changes do not affect the technical content of this permit.

**Comment 6:** B.9- Annual Compliance Certification [326 IAC 2-7-6(5)]
AK Steel requests that IDEM provide interpretation and clarification on the annual compliance certification report as discussed in B.9(c)(3). It would appear that certification of "continuous" compliance is an impossibility. For instance, a CEM that is down for only 1 hour during a year would apparently need to certify "intermittent" compliance, regardless of meeting permit limits during its 8759 hours of operation, due to the fact that for that one hour of downtime, the actual emissions are unknown. For example, the CEM on AK Steel's CGL annealing furnace was operational 99.6% in 2001 and 99.7% in 2002, and the $NO_x$ limits were met 100% of the time that the CEM was operational. However, due to the slight downtime on the CEM, which was almost all for standardization, it appears as though AK Steel would be required to certify as intermittent compliance.

As such, AK Steel requests that IDEM provide additional explanation in the Title V permit instructing a source on the manner in which it should determine intermittent or continuous compliance.

**Response 6:** Prior to the public notice period for this Part 70 operating permit, various issues regarding Annual Compliance Certifications had been addressed in a non-rule policy document (NPD) written by IDEM. The identification number of this guidance is Air-007 First Revision and it is located on the IDEM website at www.in.gov/idem/rules/policies/air/nrpd/007r1.pdf. A non-rule policy document is a policy or statement that interprets supplements or implements a statute or rule. It is not intended by the department to have the effect of law and is not related solely to internal department organization. Below is an excerpt from Air-007 First Revision:

> "The annual compliance certification must indicate whether compliance with the permit terms and conditions was continuous or intermittent. U.S. EPA has not defined what is considered continuous or intermittent, although the issue has been the subject of much debate. If U.S. EPA issues guidance that differs from this nonrule policy document, IDEM will revise this document. In order to assist permit holders with the completion of the required certification, IDEM is providing the following guidance.
>
> Continuous compliance (CC):
> In order to certify continuous compliance, a source must have no deviations, irrespective of the monitoring frequency, for the relevant permit term or condition during the reporting period. If a source has identified a deviation during the reporting period, a source cannot certify continuous compliance for the relevant permit term or condition.
>
> Intermittent compliance (IC):
> If a deviation has occurred during the reporting period, the source must certify intermittent compliance for the particular permit term or condition. As noted previously, the source must provide information about the deviation, including what the deviation was, how long the deviation lasted, estimates of excess emissions, whether or not the deviation was corrected, and the actions taken to correct the deviation."

Based on the above interpretation, a Permittee would not certify continuous compliance for a CEMS that has been offline for one hour during the one year of operation. For example, in looking at the conditions from Section D.4, continuous compliance could be certified for condition D.4.2, because CEMS downtime for one hour is not a determination that the NOx limitation in this condition was not met. Additionally, employment of the supplemental monitoring required by condition D.4.15, would support certification of compliance with condition D.4.2. Continuous compliance could not be certified for condition D.4.7, because that condition specifically states that the monitor must operate continuously, and continuously record NOx emissions from the SCR control unit. Therefore, only intermittent compliance could be certified for condition D.4.7. Should there be any questions regarding this interpretation or NPD, please contact Roger Letterman, of the Office of Air Quality, Air Compliance Section, at (317)232-8342.

Because this non-rule policy document currently exists regarding Annual Compliance Certifications, additional explanations instructing an applicant on the manner in which it should determine intermittent or continuous compliance will not be added to the Part 70 operating permit as requested by the Permittee. The response above serves as this additional instruction.

To further clarify the intent of condition B.9, Annual Compliance Certification, the second sentence of part (a) has been changed to read as:

> All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted ~~in letter form~~ no later than July 1 of each year to:

**Comment 7:** C.7- Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]: C.7(a)(2)
AK Steel has been operating for approximately 5 years and during that period of time, we have observed, as can be confirmed by OAQ's inspectors, that the asphalt paved roads within the facility have never been subject to any silt or other dust problems that could be construed as emissions. Every two weeks we spend time and money to route the sweeper around the roads and nothing is captured to warrant the expenditure. AK Steel has secured all adjacent areas with grass, landscaping, and other vegetation to prevent silt and dust from being deposited on the roadways. The asphalt roadways throughout the plant are raised approximately 6" above standard grade such that no water runs onto the roads carrying silt or soil, but rather any silt or soil that settles on the roadway actually is washed onto the adjacent vegetation.

For these reasons, AK Steel requests that the road sweeping be reduced to once every month as follows:

> (2) All paved road segments and parking lots shall be cleaned with a vehicular vacuum sweeper every month to control $PM_{10}$ emissions to no more than 3 tons per year and PM emissions to no more than 15 tons per year; and

**Response 7:** After confirming the above information with the Air Compliance Inspector assigned to AK Steel, this change can be made. Because the monitoring frequency is being lessened, a provision has been added to this condition to adjust this frequency at times when a fugitive dust problem does occur. Anytime there is a fugitive dust problem, as observed by AK Steel or any other party, the next vehicular vacuum sweeper cleaning of all paved road segments and parking lots shall be conducted at the time of the observance, or as soon as possible. After this incident, an additional sweeping shall resume again 14 days later. The monthly schedule may resume only after the additional 14 day sweeping if no other fugitive dust problems are observed during that additional 14 day consecutive period. The following revisions have been made to condition C.7(a)(2) as a result:

> All paved road segments and parking lots shall be cleaned with a vehicular vacuum sweeper **once** every ~~14 days~~ **month** to control $PM_{10}$ emissions to no more than 3 tons per year and PM emissions to no more than 15 tons per year ~~provided that~~ **Additionally, the following requirements shall apply**; ~~and~~
>
> **(A) If a fugitive dust problem occurs at any time, the Permittee shall employ the sweeper as soon as practicably possible in the incident areas;**
>
> **(B) After each incident, and the initial sweeper cleaning thereof, the Permittee shall sweep all incident areas, a second time, but no longer than 14 days after the incident; and**
>
> **(C) The monthly schedule resumes only after 14 consecutive incident-free days have passed.**

**General Comments on Section D - Facility Operating Conditions**

**Comment 8:** Consistency With the Technical Support Document
The Technical Support Document ("TSD") under "Existing Approvals" states the following:

> "All conditions from previous approvals were incorporated into this Part 70 permit except the following conditions from permits issued to AK Steel:"

Based on this language, AK Steel believes that IDEM's intent is to continue the monitoring requirements that were set forth in the original construction permit and the subsequent amendments, unless they were excepted as noted in the TSD. As detailed in the following paragraphs in this section of comments identified as: D.1.7(a), D.1.10(a), D.1.13, D.2.7(a), D.2.10(a), D.3.7(a), D.4.10(a), and D.6.6(a), AK Steel has attempted to point out the discrepancy between the Title V draft permit and the verbiage in the previous construction permit and amendments.

**Response 8:** The TSD is meant to reflect the operating permit at the time of the public comment period, and it will not be changed based on the comment above. As noted in each condition referenced above, the type of monitoring is pursuant to the original construction permit and the frequency was based, at that time, on the requirements of the Part 70 operating permit rules. Upon further review, IDEM has since determined that lesser frequencies (ie, once per day) for monitoring control devices (or of visible emission notations) is generally sufficient to ensure proper operation of the control devices themselves, and will satisfy the requirements of the Part 70 rules, 326 IAC 2-7-5 and 326 IAC 2-7-6. As a

result, the references to "once per shift" in the conditions listed in the comment above have been changed to "once per day". These conditions have been renumbered due to the deletion of the Preventive Maintenance Plan condition in each of their Section Ds. The conditions discussed above are now listed as D.1.6(a), D.1.9(a), D.1.12, D.2.6(a), D.2.9(a), D.3.6(a), D.4.9(a), and D.6.5(a). Additional changes made to each are discussed later in this document under Responses 14 and 15.

**Comment 9:** Particulate Matter Emission Testing and Emission Limits
The Fourth Amendment to the Construction Permit included specific permit flexibility language on the particulate matter emission limit for numerous emissions units, specifically, the APL Alkaline Cleaner, APL Air Quench, APL Electrolytic Pickling, APL Mixed Acid and Rinse Tanks, APL Skin Pass Temper Mill, CPL Scale Breaker, CPL Pickling Bath and Rinse Tanks, Cold Mill, Temper Mill, and CGL Alkaline Cleaner. For these emissions units, the construction permit included the following term:

> The OAQ may revise this permit to adjust the total $PM/PM_{10}$ limitation based upon the results of stack testing required in Condition 8(b). The Department will provide an opportunity for public notice and comment prior to finalizing any permit revision. IC 13-15-7-3 (Revocation or Modification of a Permit: Appeal to Board) shall apply to this permit condition.

*See e.g.*, Construction Permit (Fourth Amendment) BACT Condition No. 21, pg. 13.

This particulate matter emission limit provision was apparently inadvertently omitted from the draft Title V permit. This permit term is necessary in order to provide the appropriate amount of permit flexibility. This term should be included in the following sections:

- APL Alkaline Cleaner, section D.1.1(a).
- APL Air Quench, section D.1.1(b).
- APL Electrolytic Pickling, section D.1.1(d).
- APL Mixed Acid and Rinse Tanks, section D.1.1(e).
- APL Skin Pass Temper Mill, section D.1.1(g).
- CPL Scale Breaker, section D.2.1(a).
- CPL Pickling Bath and Rinse Tanks, section D.2.1(b)
- Cold Mill, section D.3.1(a).
- Temper Mill, section D.3.1(b).
- CGL Alkaline Cleaner, section D.4.1.

Based on the foregoing, AK Steel requests that IDEM add the above-cited term to the noted sections.

**Response 9:** Because the Permittee wishes that this language be reinserted into the above noted conditions, revisions have been made to it and it has been added in the operating permit. The following has been added to the end of condition D.1.1:

> **For parts (b), (d), (e) and (g), the OAQ may revise this permit to adjust the total PM/PM10 limitation based upon the results of IDEM approved stack testing. The Department will provide an opportunity for public notice and comment prior to finalizing any permit revision. IC 13-15-7-3 (Revocation or Modification of a Permit: Appeal to Board) shall apply to this permit condition.**

Also, it has been added accordingly to the end of conditions D.2.1 and D.3.1, and reads as:

> **For parts (a) and (b), the OAQ may revise this permit to adjust the total PM/PM10 limitation based upon the results of IDEM approved stack testing. The Department will provide an opportunity for public notice and comment prior to finalizing any permit revision. IC 13-15-7-3 (Revocation or Modification of a Permit: Appeal to Board) shall apply to this permit condition.**

Finally, it has been added to the end of condition D.4.1, as follows:

> **The OAQ may revise this permit to adjust the total PM/PM10 limitation based upon the results of IDEM approved stack testing. The Department will provide an opportunity for public notice and comment prior to finalizing any permit revision. IC 13-15-7-3 (Revocation or Modification of a Permit: Appeal to Board) shall apply to this permit condition.**

**Comments on Specific Emissions Units**

**Comment 10:** Continuous Anneal and Pickle Line Facility Description [326 IAC 2-7-5(15)]: D.1(a)(15)
Please change as follows:

> "skin pass temper mill and roll cleaning dust collection system exhausting through ~~a~~ individual baghouses to S09C, and . . ."

**Response 10:** As requested, the description above has been changed in the operating permit. Please see Response 5.

**Comment 11:** Emission Limitations and Standards [326 IAC 2-7-5(1)], D.1.1(g)
Please change as follows:

> "Filterable particulate matter ($PM/PM_{10}$) generated from the skin pass temper mill and roll cleaning dust collection system shall be controlled by ~~a baghouse~~ individual baghouses to a common stack (S09C)."

**Response 11:** As requested, the description above has been changed in the operating permit. Please see Response 5.

**Comment 12:** D.1.2 Nitrogen Oxides (NOx) Best Available Control Technology (BACT) [326 IAC 2-2]
As previously mentioned, AK Steel requests a meeting with you and appropriate agency personnel to discuss compliance/reporting issues for the two Anneal & Pickle Line (APL) annealing furnaces.

D.1.2(b): Please change the word "shall" to "may" per the following:

> (b) "The Permittee ~~shall~~ may employ an operational practice called "smoke and anneal" for certain grades of stainless steel in the 110.0 MMBtu per hour annealing furnace section No. 1 and the 55.0 MMBtu per hour annealing furnace section No. 2."…

**Response 12:** The change requested above will not be made to condition D.1.2(b). The word "may" implies that the Permittee has a choice of employing the practice, or not. Use of this term would be misleading. The fourth amendment to the construction permit, as cited in this condition, specifically uses the word "shall" because the Permittee is not given the option of choosing to use the "smoke and anneal" practice.

On May 27, 2004, representatives of IDEM OAQ Permitting discussed issues for the 2 APL annealing furnaces via telephone conference. AK Steel was advised to submit application forms to this office for review regarding their concerns on this requirement.

**Comment 13:** Compliance Determination Requirements, D.1.4 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
AK Steel is uncertain why emission units S06, S07A, S07B, S08, S09A, S09B and S09C are required to be tested immediately upon permit issuance when the intent was to test every five years. These sources were tested in February 2000, November 2000, November 2000, November 2000, March 2001, and November 1999, respectively, and based on the Draft permit language, in some cases should already have been tested. We believe that the following change should be made to better indicate when the testing should be performed:

> "During the period between 30 and 36 months after the most recent stack test or the period between 30 and 36 months after issuance of this Part 70 permit, which ever comes ~~first~~ later, . . ."

**Response 13:** Condition D.1.4, which is now listed as D.1.3, has been changed to read as follows:

> "~~During the period between 30 and 36 months~~ **Within five years** after the most recent stack test or **36 months after** issuance of this Part 70 permit, whichever **is** ~~comes first~~ **later**, . . ."

**Comment 14:** Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)], D.1.6 Visible Emissions Notations, D.1.6(a)
The requirement to perform visible emission notations once per shift is excessive and not justified by the historical data AK Steel has previously submitted to IDEM. Following is a summary of that historical data from 2000, 2001, 2002 and 2003 to date, for these emissions units:

S06: 0 abnormal readings out of approximately 2,800 readings.
S08: 0 abnormal readings out of approximately 2,800 readings.
S09A: 11 abnormal readings out of approximately 2,800 readings.
S09B: 24 abnormal readings out of approximately 2,800 readings.
S09C: 0 abnormal readings out of approximately 2,800 readings.

Based on this historical data, the requirement to conduct per shift visible emissions notations does not make effective use of AK Steel's resources and will not lead to any useful information. AK Steel requests that IDEM change the frequency of the visible emission notations from once per shift to once per week. Once per week visible emission notations will adequately meet the compliance monitoring requirement of 326 IAC 2-7-6(1) and 326 IAC 2-7-5(3). In addition, IDEM has regularly agreed to once per week visible emission notations in final Title V permits for other facilities. The cost to AK Steel to perform visible emission notations at Rockport Works is approximately $50,000 per year.

**Response 14:** The once per shift frequencies for visible emissions notations on the units listed above were carried into the draft Part 70 operating permit from the original construction permit. Since the public comment period, the frequency has been changed to "once per day" as previously discussed in Response 8. Without the company names of the issued permits noted in the comment above, IDEM is not able to fully respond to the Permittee's claim that "IDEM has regularly agreed to once per week visible emission notations in final Title V permits for other facilities". Visible emission notations are used to indicate compliance with 326 IAC 5-1 and the particulate limits. Since process upset can occur suddenly and without warning (possibly indicating a violation of the opacity and particulate limits), weekly notations would not be sufficient for the Permittee to certify compliance.

Other changes, however, have been made to D.1.6(e), which is now listed as D.1.5(e). The changes are as follows:

> ~~The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an~~ **If** abnormal emission**s** ~~is~~ **are** observed**, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions and Exceedances**. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~**Response to Excursions or Exceedances**, shall be considered a violation of this permit.

Because the revision above is a standard change to the last two sentences of the Visible Emissions Notations condition, conditions D.2.5, D.3.5 and D.4.8 (which were previously listed as D.2.6, D.3.6 and D.4.9) have also been changed in this manner. See Response 26 for changes made to condition D.3.6 which is now listed as D.3.5.

**Comment 15:** D.1.7 Parametric Monitoring for Baghouses, D.1.7(a)
Pursuant to condition 10 of Construction Permit 147-6713-00041 and subsequent amendments, AK Steel is only required to record the total static pressure drop across the baghouse once per day, not once per shift as noted in the public notice draft Title V permit. Once per day monitoring will adequately meet the compliance monitoring requirement of 326 I.A.C. 2-7-6 and 326 I.A.C. 2-7-5(3). As such, AK Steel requests that the pressure drop frequency be changed from once per shift to once per day, and the range from 1.5 to 5.0 to 0.3 to 8.0 inches of water. The associated cost with current parametric readings at Rockport Works is in excess of $15,000 per year. Going to a "once per shift" operating mode will increase those costs to about $30,000 per year.

**Response 15:** D.1.7 is now listed as D.1.6. Please see Response 8 for discussion regarding why this requirement has been changed back to "once per day". The revisions made to the first paragraph of D.1.6(a) are as follows:

> Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10, and 326 IAC 2-2 (PSD), the Permittee shall record the total static pressure drop across the baghouses (S05, S08, S09C) used in conjunction with the APL~~. Pursuant to this permit, these recordings shall be taken~~ at least once per ~~shift~~ **day** when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of ~~1.5~~ **0.3** and ~~5.0~~ **8.0** inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions and Exceedances**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions and Exceedances**, shall be considered a violation of this permit.

Due to these changes, other Parametric Monitoring conditions have been similarly revised as needed, with the exception of the pressure drop ranges. These conditions are listed as D.1.9, D.2.6, D.2.9, D.3.6, D.4.9, and D.6.5 (previously, they were D.1.10, D.2.7, D.2.10, D.3.7, D.4.10, and D.6.6). Additionally, the corresponding recordkeeping conditions that referred to "once per shift" have also been changed to "once per day".

**Comment 16:** D.1.10 Parametric Monitoring for Scrubbers, D.1.10(a)
Pursuant to condition 11 of Construction Permit 147-6713-00041 and subsequent amendments, AK Steel is only required to record the pH of the scrubbing liquid (if applicable), pressure drop and scrubbing liquid flow rate of the scrubbers once per day, not once per shift as noted in the draft Title V permit. Once per day monitoring will adequately meet the compliance monitoring requirement of 326 IAC 2-7-6 and 326 IAC 2-7-5(3). As such, AK Steel requests that the

parametric monitoring frequency of these scrubber conditions be changed from once per shift to once per day. A once per shift frequency is more stringent than the requirements of numerous MACT sources, such as the Chromium NESHAP at 40 C.F.R. Part 63, Subpart N (*see e.g.*, once per day pressure drop monitoring requirements for the roll repair shop, section D.5.9(a)). It would be illogical to require a greater monitoring frequency for a control device that is controlling particulate than for a control device that is controlling a hazardous air pollutant. The associated cost with current parametric readings at Rockport Works is in excess of $15,000 per year. Going to a "once per shift" operating mode will increase those costs to about $30,000 per year.

**Response 16:** The frequency has been changed to daily. Please see Response 8 and Response 15 regarding the changes made to this condition, now listed as D.1.9.

**Comment 17:** D.1.13 Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19], D.1.13(c)
Pursuant to condition 11 of Construction Permit 147-6713-00041 and subsequent amendments, AK Steel is only required to record the pH of the scrubbing liquid (if applicable), pressure drop and scrubbing liquid flow rate of the scrubbers once per day, not once per shift as noted in the draft Title V permit. Once per day monitoring will adequately meet the compliance monitoring requirement of 326 IAC 2-7-6 and 326 IAC 2-7-5(3). As such, AK Steel requests that the parametric monitoring frequency of these scrubber conditions be changed from once per shift to once per day. A once per shift frequency is more stringent than the requirements of numerous MACT sources, such as the Chromium NESHAP at 40 CFR Part 63, Subpart N (*see e.g.*, once per day pressure drop monitoring requirements for the roll repair shop, section D.5.9(a)). It would be illogical to require a greater monitoring frequency for a control device that is controlling particulate than for a control device that is controlling a hazardous air pollutant. The associated cost with current parametric readings at Rockport Works is in excess of $15,000 per year. Increasing the frequency to an "once per shift" operating mode will increase those costs to about $30,000 per year.

**Response 17:** D.1.13 is now D.1.12. Please see Response 8 and Response 15 regarding the change in frequency. Additionally, a typo was found in part (e) of this condition. In the second sentence of part (e), the word "if" has been changed to "of". This correction has also been made to this sentence in other recordkeeping conditions which have been renumbered, and are now listed as D.2.12(e), D.3.9(e), D.4.17(i), D.6.8(b), D.7.5, D.8.7(b), and D.10.4(b).

**Comment 18:** Continuous Pickle Line
As previously mentioned, AK Steel requests a meeting with you and appropriate agency personnel to discuss compliance/reporting issues for the Continuous Pickle Line.

**Response 18:** IDEM has met with AK Steel over the past several years on various permitting issues. Compliance issues regarding the Continuous Pickle Line may be addressed to the OAQ Air Compliance Section. There are currently no reporting requirements for this process. AK Steel can petition IDEM, OAQ, to make changes to the current requirements for this process with details of the changes they wish to be made to their Part 70 operating permit. IDEM, OAQ, will work with AK Steel to resolve any outstanding issues.

**Comment 19:** Section D.2, Facility Description [326 IAC 2-7-5(15)]
Please change as follows:

(3) "…system to S02 while processing carbon steel. The rinse section exhausts through a multi-stage oxidation/reduction and acid neutralization scrubbing system to S09B while processing stainless steel."

**Emission Limitations and Standards**

**D.2.x** Nitrous Oxides (NOx) Best Available Control Technology (BACT)
The processes of the continuous pickling line (CPL) shall be limited as follows:

(a) "While processing stainless steel, the CPL rinse section shall be controlled by a multi-stage oxidation/reduction and acid neutralization scrubbing system to S09B and limited under condition D.1.2(c)"

**Response 19:** Although the changes requested above by the Permittee seem simple, a more technical review by IDEM would be required prior to making such revisions. The construction permit BACT review initially performed for the Continuous Anneal and Pickling Line (APL) NOx emissions did not include review of NOx emissions from the HCl acid pickle and rinse tanks wet scrubber system. Previous required stack testing performed for the APL stack S09B does not state that the above noted equipment from the CPL was in operation during the test(s), and exhausting to stack S09B. In addition, the APL process has a PM/PM10 BACT limit that may also be affected by a change such as this. Due to these issues, the changes requested should be reviewed under separate application and not in conjunction with comments

submitted for the draft Part 70 operating permit review. Therefore, no changes have been made as a result of this comment.

**Comment 20:** Compliance Determination Requirements, D.2.4 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]
AK Steel is uncertain why S01 and S02 are required to be tested immediately upon permit issuance when the intent was to test every five years. These sources were tested in November of 2000. We believe that the following change should be made to better indicate when the testing should be performed:

> "During the period between 30 and 36 months after the most recent stack test or the period between 30 and 36 months after issuance of this Part 70 permit, which ever comes ~~first~~ later,…."

**Response 20:** Condition D.2.4, now D.2.3, has been changed to read as follows:

> "~~During the period between 30 and 36 months~~ **Within five years** after the most recent stack test or **36 months after** issuance of this Part 70 permit, whichever **is** ~~comes first~~ **later**, . . ."

**Comment 21:** D.2.5 Particulate Matter (PM) Control [326 IAC 2-2], D.2.5(b)
AK Steel requests that reference to stack S04 be removed from this section since it is addressed in the Ancillary Equipment section D.6(4) and expanded upon in subsequent sections beginning with D.6.6.

**Response 21:** D.2.5 is now listed as D.2.4. This stack reference has been removed as requested above. Mistakenly, this stack reference was left in this condition, although the associated unit and its requirements had been moved to Section D.6. As a result, D.2.4(b) has been revised to read as:

> Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, and 326 IAC 2-2 (PSD), upon startup, scrubber~~s~~ ~~(~~S02~~, S04)~~ shall be operated at all times and controlling PM when ~~their~~ **its** associated facility is in operation.

**Comment 22:** Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)], D.2.6 Visible Emissions Notations, D.2.6(a)
The requirement to perform visible emission notations once per shift is excessive and not justified by the historical data AK Steel has previously submitted to IDEM. Following is a summary of that historical data from 2000, 2001, 2002 and 2003 to date, for these emissions units:

S01: 0 abnormal readings out of approximately 2,800 readings.
S02: 7 abnormal readings out of approximately 2,800 readings.

Based on this historical data, the requirement to conduct per shift visible emissions notations does not make effective use of AK Steel's resources and will not lead to any useful information. AK Steel requests that IDEM change the frequency of the visible emission notations from once per shift to once per week. Once per week visible emission notations will adequately meet the compliance monitoring requirement of 326 IAC 2-7-6(1) and 326 IAC 2-7-5(3). In addition, IDEM has regularly agreed to once per week visible emission notations in final Title V permits for other facilities. The cost to AK Steel to perform visible emission notations at Rockport Works is approximately $50,000 per year.

**Response 22:** D.2.6 is now D.2.5. Please see Response 14 regarding the change in monitoring frequency for this condition.

**Comment 23:** D.2.7 Parametric Monitoring for Baghouses, D.2.7(a)
Pursuant to condition 10 of Construction Permit 147-6713-00041 and subsequent amendments, AK Steel is only required to record the total static pressure drop across the baghouse once per day, not once per shift as noted in the public notice draft Title V permit. Once per day monitoring will adequately meet the compliance monitoring requirement of 326 IAC 2-7-6 and 326 IAC 2-7-5(3). As such, AK Steel requests that the pressure drop frequency be changed from once per shift to once per day. The associated cost with current parametric readings at Rockport Works is in excess of $15,000 per year. Going to a "once per shift" operating mode will increase those costs to about $30,000 per year.

**Response 23:** D.2.7 is now D.2.6. Please see Responses 8 and 15.

**Comment 24:** D.2.10 Parametric Monitoring for Scrubbers, D.2.10(a)

Pursuant to condition 11 of Construction Permit 147-6713-00041 and subsequent amendments, AK Steel is only required to record the pH of the scrubbing liquid, pressure drop and scrubbing liquid flow rate of the scrubbers once per day, not once per shift as noted in the draft Title V permit. Once per day monitoring will adequately meet the compliance monitoring requirement of 326 IAC 2-7-6 and 326 IAC 2-7-5(3). As such, AK Steel requests that the parametric monitoring frequency of these scrubber conditions be changed from once per shift to once per day. A once per shift frequency is more stringent than the requirements of numerous MACT sources, such as the Chromium NESHAP at 40 CFR Part 63, Subpart N (*see e.g.*, once per day pressure drop monitoring requirements for the roll repair shop, section D.5.9(a)). It would be illogical to require a greater monitoring frequency for a control device that is controlling particulate than for a control device that is controlling a hazardous air pollutant. The associated cost with current parametric readings at Rockport Works is in excess of $15,000 per year. Increasing the frequency to a "once per shift" operating mode will increase those costs to about $30,000 per year.

**Response 24:** D.2.10 is now D.2.9. Please see Responses 8, 15, and 16 regarding the change in frequency. Additionally, the reference to S04 has been deleted from first sentence of D.2.9(b) because this unit is addressed in Section D.6. The deletion is as follows:

> The gauge employed to take the pressure drop across the scrubbers shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within ~~±2% of full scale reading for S04, or~~ 0.25% (or ±5 digits at 22 degrees Celsius) for S02.

**Comment 25:** Continuous Cold Mill and Temper Mill, Compliance Determination Requirements, D.3.4 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]
AK Steel is uncertain why S11 and S16 are required to be tested immediately upon permit issuance when the intent was to test every five years. These sources were tested in November 2000 and December 1999, respectively. We believe that the following change should be made to better indicate when the testing should be performed:

> "During the period between 30 and 36 months after the most recent stack test or the period between 30 and 36 months after issuance of this Part 70 permit, which ever comes ~~first~~ later,…."

**Response 25:** Condition D.3.4, now D.3.3, has been changed to read as follows:

> "~~During the period between 30 and 36 months~~ **Within five years** after the most recent stack test or **36 months after** issuance of this Part 70 permit, whichever **is** ~~comes first~~ **later**, . . ."

**Comment 26:** Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)], D.3.6 Visible Emissions Notations, D.3.6(a)
The requirement to perform visible emission notations once per shift is excessive and not justified by the historical data AK Steel has previously submitted to IDEM. Following is a summary of that historical data from 2000, 2001, 2002 and 2003 to date, for these emissions units:

S11: 0 readings above 5% opacity out of approximately 2,800 readings.
S12: 0 readings above 5% opacity out of approximately 2,800 readings.

Based on this historical data, the requirement to conduct per shift visible emissions notations does not make effective use of AK Steel's resources and will not lead to any useful information. AK Steel requests that IDEM change the frequency of the visible emission notations from once per shift to once per week. Once per week visible emission notations will adequately meet the compliance monitoring requirement of 326 IAC 2-7-6(1) and 326 IAC 2-7-5(3). In addition, IDEM has regularly agreed to once per week visible emission notations in final Title V permits for other facilities. The cost to AK Steel to perform visible emission notations at Rockport Works is approximately $50,000 per year.

**Response 26:** D.3.6 is now D.3.5. The units in this condition are S11 and S16 (not S12). Please see Response 8 regarding the change in monitoring frequency.

**Comment 27:** D.3.7 Parametric Monitoring, D.3.7(a)
Pursuant to condition 12 of Construction Permit 147-6713-00041 and subsequent amendments, AK Steel is only required to record the total static pressure drop across the mist eliminator once per day, not once per shift as noted in the draft Title V permit. Once per day monitoring will adequately meet the compliance monitoring requirement of 326 IAC 2-7-6 and 326 IAC 2-7-5(3). As such, AK Steel requests that the pressure drop monitoring frequency of the mist eliminator be changed from once per shift to once per day. A once per shift frequency is more stringent than the requirements of numerous MACT sources, such as the Chromium NESHAP at 40 C.F.R. Part 63, Subpart N (*see e.g.*, once per day

pressure drop monitoring requirements for the roll repair shop, section D.5.9(a)). It would be illogical to require a greater monitoring frequency for a control device that is controlling particulate than for a control device that is controlling a hazardous air pollutant. The associated cost with current parametric readings at Rockport Works is in excess of $15,000 per year. Increasing the frequency to an "once per shift" operating mode will increase those costs to about $30,000 per year.

**Response 27:** D.3.7 is now D.3.6. Please see Responses 8 and 15.

**Comment 28:** Continuous Galvanizing Line, Compliance Determination Requirements, D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
AK Steel is uncertain why S17 is required to be tested immediately upon permit issuance when the intent was to test every five years. This source was tested in May 1999. We believe that the following change should be made to better indicate when the testing should be performed:

> "During the period between 30 and 36 months after the most recent stack test or the period between 30 and 36 months after issuance of this Part 70 permit, which ever comes ~~first~~ later,…."

**Response 28:** Condition D.4.5, now D.4.4, has been changed to read as follows:

> "~~During the period between 30 and 36 months~~ **Within five years** after the most recent stack test or **36 months after** issuance of this Part 70 permit, whichever **is** ~~comes first~~ **later**, . . ."

**Comment 29:** Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)], D.4.9 Visible Emissions Notations, D.4.9(a)
The requirement to perform visible emission notations once per shift is excessive and not justified by the historical data AK Steel has previously submitted to IDEM. Following is a summary of that historical data from 2000, 2001, 2002 and 2003 to date, for this emissions unit:

S17: 0 abnormal readings out of approximately 2,800 readings.

Based on this historical data, the requirement to conduct per shift visible emissions notations does not make effective use of AK Steel's resources and will not lead to any useful information. AK Steel requests that IDEM change the frequency of the visible emission notations from once per shift to once per week. Once per week visible emission notations will adequately meet the compliance monitoring requirement of 326 IAC 2-7-6(1) and 326 IAC 2-7-5(3). In addition, IDEM has regularly agreed to once per week visible emission notations in final Title V permits for other facilities. The cost to AK Steel to perform visible emission notations at Rockport Works is approximately $50,000 per year.

**Response 29:** D.4.9 is now D.4.8. Please see Response 14 regarding the change in monitoring frequency for this condition.

**Comment 30:** D.4.10 Parametric Monitoring for Scrubber, D.4.10(a)
AK Steel requests that the parenthesized terminology (if applicable) be added following the reference to recording the pH of the scrubbing liquid in the first and second paragraphs of this section as follows: "….the pH (if applicable) of the scrubbing liquid,…" In many cases, such as this one, the pH of the scrubbing liquid is not relevant to the scrubber's ability to clean the air stream, and the additional work required to record the pH is moot.

Pursuant to condition 11 of Construction Permit 147-6713-00041 and subsequent amendments, AK Steel is only required to record the pH of the scrubbing liquid (if applicable), pressure drop and scrubbing liquid flow rate of the scrubbers once per day, not once per shift as noted in the draft Title V permit. Once per day monitoring will adequately meet the compliance monitoring requirement of 326 IAC 2-7-6 and 326 IAC 2-7-5(3). As such, AK Steel requests that the parametric monitoring frequency of these scrubber conditions be changed from once per shift to once per day. A once per shift frequency is more stringent than the requirements of numerous MACT sources, such as the Chromium NESHAP at 40 C.F.R. Part 63, Subpart N (*see e.g.*, once per day pressure drop monitoring requirements for the roll repair shop, section D.5.9(a)). It would be illogical to require a greater monitoring frequency for a control device that is controlling particulate than for a control device that is controlling a hazardous air pollutant. The associated cost with current parametric readings at Rockport Works is in excess of $15,000 per year. Increasing the frequency to a "once per shift" operating mode will increase those costs to about $30,000 per year.

**Response 30:** D.4.10 is now D.4.9. Please see Responses 8 and 15 regarding the change in monitoring frequency for this condition. The pH monitoring mistakenly included in this condition has been deleted, and a minor typo has been corrected at the beginning of part (a). The changes to D.4.9(a) are as follows:

> **Pursuant to** Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, A147-11471-00041, issued April 18, 2002, and 326 IAC 2-2 (PSD), the Permittee shall record the ~~pH of the scrubbing liquid,~~ pressure drop and scrubbing liquid flow rate of scrubber S17 at least once per ~~shift~~ **day** when the process is in operation. When for any one reading, the pressure drop across the scrubber~~, or the pH of the scrubbing liquid~~ is outside its normal range, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- ~~Compliance Response Plan- Preparation, Implementation, Records, and Reports~~ **Response to Excursions and Exceedances**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan- Preparation, Implementation, Records, and Reports~~ **Response to Excursions and Exceedances**, shall be considered a violation of this permit.
>
> The instruments used for determining the~~ pH of the scrubbing liquid,~~ pressure drop, and scrubbing liquid flow rate at the inlet of the control device shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Additionally, part (d) of the record keeping condition D.4.17, now D.4.16, did not address the flow rate. This change and the frequency change to part (d) are as follows:

> (c) To document compliance with condition D.4.9, the Permittee shall maintain once per ~~shift~~ **day** records of the pressure drop **and flow rate** during normal operation when exhausting to the atmosphere.

**Comment 31:** D.4.16 NOx Monitoring System Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(3)], D.4.16(a)
AK Steel objects to the requirement to monitor the ammonia flow rate and inlet duct temperature at least four times per hour when the CEM is down. As reported to IDEM through quarterly reports for 2001 and 2002, the CEM on the CGL annealing furnace was operational 99.6% in 2001 and 99.7% in 2002. In addition, the $NO_x$ limits were met 100% of the time that the CEM was operational. As such, there is no rational basis for requiring resource-intensive back-up monitoring for the extremely limited times the CEM is not operating, especially in light of the compliance record for the emissions unit. IDEM cites to 326 IAC 2-7-6 and 326 IAC 2-7-5(3) as justification for the back-up monitoring. However, AK Steel believes these provisions do not dictate that IDEM must provide back-up monitoring. A CEM is more than sufficient to meet the regulatory requirements.

**Response 31:** D.4.16 is now D.4.15. The basis of the Part 70 operating permit program is assurance of continuous compliance which, in some cases, requires more stringent monitoring than what the original construction permit required. For a Part 70 operating permit, the Permittee must be able to assure continuous compliance with all of the requirements. As noted in the comment above, the CEMS is rarely non-operational. Therefore, this does not support the argument that required back-up monitoring is resource intensive. This required back-up monitoring is therefore deemed reasonable for assuring continuous compliance with the NOx limit during the "extremely limited times" the CEMS is down. A new sentence has been added to part (a) because of standard changes that are being made to the entire permit. The sentence added at the end of part (a) reads as:

> **When for any one reading, the ammonia flow rate and inlet duct temperature are outside the normal range during downtime of the NOx CEMS, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances.**

Because of this change, the last sentence of D.4.16(h) (previously D.4.17(h)) has been deleted.

**Comment 32:** Roll Repair Shop, Compliance Monitoring Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)], D.5.8 Performance Testing, D.5.8(a)
During the noted performance test, the pressure drop across the composite mesh pad system was actually 3.91 inches of water, not 4.0 inches of water as noted in the permit. This average was based on approximately 20 differential readings. However, the average was measured by sophisticated equipment used by the stack testing company that was able to measure to the tenths of an inch. It is AK Steel's position that the average pressure drop should be rounded to 4.0 inches of water, as AK Steel's gauges, which are standard in the industry, are unable to read pressure drop to the tenth of an inch, let alone the hundredths of an inch. Additionally, the Chromium Plating MACT standard does not contemplate pressure drop averages carried out to the tenths or hundredths of an inch. As such, AK Steel agrees that the permit should note the average pressure drop as 4.0 inches of water, but seeks clarification from IDEM that it is in compliance with MACT standard when the pressure drop is within plus or minus one inch of water column of 4.0 inches of water.

**Response 32:** Part (a) of condition D.5.9 (now D.5.8), Monitoring to Demonstrate Continuous Compliance [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 63.343(c)], states that "Pursuant to 40 CFR 63.343(c)(1)(ii), when using a composite mesh-pad system to comply with the limit specified in condition D.5.4, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day when a hard chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant values for pressure drop established during multiple performance tests." Because this MACT outlines the monitoring necessary to demonstrate continuous compliance with the standards as shown in condition D.5.8, no further clarification in the permit is necessary regarding this matter.

**Comment 33:** Ancillary Equipment, Facility Description [326 IAC 2-7-5(15)]
Please add the word gallons as follows:

> (8) A miscellaneous oil storage tank for the continuous pickling line (CPL), consisting of one (1) CPL pickling tank, with a capacity of 15,000 gallons."

**Response 33:** The change requested above has been made exactly as requested in the Part 70 operating permit to the descriptions for the CPL miscellaneous storage tank.

**Comment 34:** Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)], D.6.6 Parametric Monitoring for Scrubber, D.6.6(a)
Pursuant to condition 11 of Construction Permit 147-6713-00041 and subsequent amendments, AK Steel is only required to record the pH of the scrubbing liquid, pressure drop and scrubbing liquid flow rate of the scrubber once per day, not once per shift as noted in the public notice draft Title V permit. Once per day monitoring will adequately meet the compliance monitoring requirement of 326 IAC 2-7-6 and 326 IAC 2-7-5(3). As such, AK Steel requests that the parametric monitoring frequency for this scrubber be changed from once per shift to once per day. Current costs to AK Steel for parametric readings are approximately $15,000 per year. Increasing the frequency to once per shift will increase the costs to $30,000 per year.

AK Steel requests a sentence be added to the paragraph to allow maintenance activities to be accomplished as required by the permit. We also request that the permit language be revised by deleting the words "…pH of the scrubbing liquid,…", because this is a once through scrubber.

> (a) "Pursuant to A147-11471-00041, issued April 18, 2002 and 326 IAC 2-2 (PSD), the Permittee shall record the ~~pH of the scrubbing liquid,~~ pressure drop and scrubbing liquid flow rate of scrubber S04 at least once per ~~shift~~ day when the process is in operation. The tank farm scrubber (S04) will be considered in operation when material is being added to or taken from the tanks. When for any one…"

**Response 34:** D.6.6 is now listed as D.6.5. Regarding the request to change the monitoring frequency above, please see Responses 8 and 15. Since the Permittee wishes to have language removed based on the scrubber being a "once through" unit, part (a) has been revised as follows:

> Pursuant to A147-11471-00041, issued April 18, 2002 and 326 IAC 2-2 (PSD), the Permittee shall record the ~~pH of the scrubbing liquid,~~ pressure drop and scrubbing liquid flow rate of scrubber S04 at least once per ~~shift~~ **day** when the process is in operation. **The process operation occurs each time material is being added to or taken from the tanks controlled by scrubber S04.**

**********

In addition to the comments submitted by the Permittee, the following environmental groups and citizens have also sent in written comments. For ease of reference to the comments and responses in this document, or ATSD, these are numbered 35 to 59.

On January 6, 2004, the following environmental organizations; Hoosier Environmental Council, Indiana Division Izaak Walton League of America, Protect Our Woods, Save Our Rivers, Save Our Land & Environment (SOLE), and Valley Watch, Inc., collectively submitted the following comments:

**General Comments**

**Comment 35:** AK Steel's Rockport Works is a steel coil finishing mill that was constructed as a greenfields project under a PSD permit issued with four revisions, the final permit was issued on April 18, 2002. During the period that this permit was under review and revision, EPA promulgated revised National Ambient Air Quality Standards ("NAAQS") for ozone

and particulate matter ("PM"). The revised standards include air quality criteria that are more relevant to protection of human health and the environment than the previous standards. These revised standards include 8-hour standards for ozone and a PM standard based on fine particles less than 2.5 microns in diameter.

The implementation of the revised standard was delayed as a result of court challenges. The Supreme Court has upheld the standards and implementation of the revised standards has begun. An initial step of implementation was ambient air quality monitoring in order to develop the basis for designation of areas that meet and fail to meet the NAAQS. Recent monitoring data indicates that the area around the AK Steel Rockport Works does not meet the 8-hour ozone standard and is unlikely to meet the fine PM standard.

The air quality modeling that was conducted to support the PSD permit showed that the Rockport Works would significantly impact local air quality and consume increment under the 1-hour ozone standard and the PM10 micron standard. It is likely that under the more stringent revised standards, the Rockport Works contributes to violations of air quality standards.

This permit should not be issued because it fails to meet the requirements of Indiana Administrative Code. In particular, this permit fails to meet the requirements of 326 IAC 2-6.1-5(1)(D) Operating permits content in that this permit will not assure that the Southwestern Indiana will attain and maintain compliance with National Ambient Air Quality Standards.

> **326 IAC 2-6.1-5 Operating permit content**
> Authority: IC 13-14-8; IC 13-17-3-4; IC 13-17-3-11
> Affected: IC 13-15; IC 13-17
> Sec. 5. (a) permits or permit revisions issued under this rule shall contain the following:
> (1) Emission limitations for any source or emissions unit that assure:
> (A) the ambient air quality standards set forth in 326 IAC 1-3 will be attained or maintained, or both;
> (B) the applicable prevention of significant deterioration maximum allowable increases set forth in 326 IAC 2-2 will be maintained;
> (C) the public health will be protected; and
> (D) compliance with the requirements of this title and the requirements of the CAA will be maintained.

To the extent that 326 IAC 2-6.1-5(1)(A) Operating permits content requires that this operating permit assure that NAAQS set forth in 326 IAC 1-3 be attained and maintained and that the purpose of 326 IAC 1-3 is to establish standards "to the extent necessary to protect health and welfare" and in consideration of the fact that Southwestern Indiana is currently not meeting the 8-hour ozone standard, it would be inconsistent with the intent of the law to issue this permit prior to and without consideration of the impacts of this source on public health under the 8-hour ozone standard and the PM 2.5 standard. This permit should not be issued prior to the US EPA's designations of nonattainment under the 8-hour ozone standard.

> GENERAL PROVISIONS
> **326 IAC 1-3-1 Purpose of rule; applicability**
> Authority: IC 13-1-1-4; IC 13-7-7
> Affected: IC 13-1-1-5
> Sec. 1. (a) The purpose of this rule (326 IAC 1-3) is to establish primary and secondary ambient air quality standards for the state of Indiana to the extent necessary to protect public health and welfare, and which are consistent with the intent and provisions of the Indiana law.

**Response 35:** In regards to southwestern Indiana, U.S. EPA's designations of nonattainment under the 8-hour ozone standard apply to Vanderburgh and Warrick Counties. Spencer County has been designated as attainment under the 8-hour ozone and PM2.5 standards. Therefore, prior permits issued to AK Steel continue to comply with 326 IAC 2-6.1-5 and 326 IAC 1-3-1.

**Specific Comments**

**Comment 36:** Additional Dispersion Modeling Should Be Performed
The original modeling performed as part of the 1996 permit application showed that the proposed plant contributed 20.5 micrograms per cubic meter of PM 10 on a 24-hour basis and 1 ppb of ozone on a one hour basis. Since the modeling was performed, several sources were unable to demonstrate compliance with permit limitations which were revised by IDEM. In addition, no modeling demonstration for compliance with neither the 8-hour ozone standard nor the PM 2.5 standard was provided.

As the counties to the west of the Rockport Works are likely to be designated as nonattainment under both the 8-hour ozone standard and the PM 2.5 standard, the contributions of the Rockport Works may be a principal factor in causing this non-attainment. Dispersion modeling that is representative of the revised permit conditions should be conducted to determine air quality impacts under both the existing and revised NAAQS prior to issuance of the Title V permit for AK Steel Rockport Works.

**Response 36:** See Response 35 regarding the county designation as attainment for the ozone standards. It is correct that several emission units at the plant did not demonstrate compliance with the limits in the original construction permit. However, this is not the reason IDEM revised the limits. AK Steel received its original Construction Permit (141-6713-00041) in 1997. Since that time, several amendments have been issued. In one case, failed stack testing resulted in their application for a Significant Source Modification (141-11471-00041). This was issued on April 18, 2002. This approval revised permit conditions regarding particulate matter (PM) emissions. Originally, the permit had only addressed filterable PM in regards to emission limits (calculated numerical thresholds by which emissions must not exceed). These emission limits were determined through BACT (Best Available Control Technology) review and did not account for condensible PM (essentially, this is vaporized particulate). It should be noted that there are no emission factors (rates) for condensibles, and that the BACT/RACT Clearinghouse does not recognize condensibles. There is no control device capable of mitigating or capturing the condensible portion of the particulate matter. The condensible PM component caused failed testing, demonstrating non-compliance with the PM emissions limit. As a result, these PM limits were revised to include the condensible portion (as samples taken during the test can be quantified). Testing a particular unit is the only means by which to establish a numerical limit for the condensible portion (i.e. the condensibles are measured as the unit demonstrates compliance with its filterable limit). The revision of these limits was necessary to ensure that condensible PM was accountable.

**Comment 37:** Additional Ambient Monitoring Should Be Performed
The existing permits do not identify what, if any, pre-construction or post-construction monitoring was required as part of the PSD requirements for this facility. The recent monitoring data that indicates exceedances of the revised standards indicates that the pre- and post-construction monitoring requirements were not sufficiently stringent to insure compliance with the NAAQS. Additional ambient monitoring should be required.

**Response 37:** AK Steel's original Construction Permit (141-6713-00041) contained appropriate monitoring requirements. At the time of issuance, IDEM required that AK Steel operate the required ozone monitor for three complete seasons to determine compliance with the NAAQS (National Ambient Air Quality Standards). The ozone monitor was located approximately 22 miles northeast of the plant (assuming southwest prevailing winds) thus allowing for peak ozone formation from the source. Because of AK Steel's close proximity to the Spencer-Perry county line, 22 miles northeast put the monitor in Perry County. The monitor operated for part of 1998 and the entire ozone seasons of 1999, 2000, and 2001. This met the requirement to operate the ozone monitor for three complete ozone seasons. Because of this, the monitoring requirements were met and the monitoring requirement was discontinued as a result. A summary of the results from this monitors data collection can be found at http://www.in.gov/idem/programs/air/amb/ambient/summary/reports/8hr_ozone_status_95_thru_05.pdf.

Currently, IDEM operates two ozone monitors in Vanderburgh County, three in Warrick County, and one in Perry County. Spencer County data for the years 2000 and 2002 is from a PM-2.5 monitoring site located in Dale, and the data used for the attainment demonstration was from the years 2001 and 2003 of which the annual average of 14.4ug/M3 was calculated.

Because of the information above, it is not necessary to employ additional monitors in southwestern Indiana, or add new monitoring requirements in this Part 70 operating permit.

**Comment 38:** Control Requirements Should be Reevaluated
Federal regulations set forth at 40 C.F.R. Sec. 52.21 (k) require:

> "The owner or operator of the proposed source or modification shall demonstrate that allowable emission increases from the proposed source or modification, in conjunction with all other applicable emissions increases or reductions (including secondary emissions), would not cause or contribute to air pollution in violation of: (1) Any national ambient air quality standard in any air quality control region."

Recent monitored exceedances of the revised NAAQS indicate that this requirement may not have been met. Issuance of this Part 70 Operating Permit would provide a permit shield that would allow the Rockport Works to continue to operate and contribute to NAAQS violations. The emissions limitations in the proposed permit should be revaluated to determine if a more stringent application of BACT would eliminate these exceedances.

**Response 38:** Please see Response 37. Because of the information discussed in Responses 35 and 37, it has not been technically proven, to this day, that AK Steel is causing or contributing to NAAQS violations. Current monitoring in southwestern Indiana is sufficient in determining the attainment status of the area. Therefore, it is not necessary to reevaluate permit emission limitations or apply more stringent application of BACT as a result.

**Practical Enforceability Issues**

**Comment 39:** A permit is enforceable as a practical matter if permit conditions (1) establish clear legal obligations for the source, and (2) provide mechanisms for verifying compliance. Permit conditions must be unambiguous and devoid of vague language that prevents or complicates enforcement. Potential consequences of inappropriate language that is subject to alternative interpretations include the following:

- Source non-compliance due to misunderstandings related to unclear conditions;
- Permit conditions creating new and unintended exemptions from the underlying applicable requirements referenced in the permit, and
- Permit language that effectively allows non-compliance or does not promote detection and prompt correction of problems leading to noncompliance.

U.S. EPA and Earth Day Coalition, "Training Manual for Receiving Title V Permits - A Workshop for Citizen Participation," Tab H at 1 (August 2001) (hereinafter "EPA Title V Training Manual") See also Clean Air Act Sec. 504 (c), 42 U.S.C. Sec. 7661c(c) ("Each permit issued under this subchapter shall set forth inspection, entry, monitoring, compliance certification, and other reporting requirements to assure compliance with the permit terms and conditions.").

The following terms that may result in practical enforceability problems, and therefore should not be included in Title V permits, have been specifically identified in the EPA Title V Training Manual, Tab H at 5-7:

- normally
- as soon as possible
- promptly
- significant
- should
- may
- as suggested by the manufacturer's specifications
- take reasonable precautions
- use best engineering practices

The draft AK Steel Rockport Works Title V permit contains such ambiguous language that should be expunged in favor of more specific language that clearly defines the Permittee's obligations to minimize the potential for confusion and ensure practical enforceability of all applicable requirements. Specific examples of the inappropriate incorporation of vague and ambiguous language and proposed revisions to the draft AK Steel Rockport Works Title V permit are set forth below.

General Conditions, B.7 (a) – page 12 of 64
The term "within a reasonable time" found in the last line of this subsection presents practical enforceability issues because such a requirement to furnish information to IDEM "within a reasonable time" is too subjective to be practically enforceable. See EPA Title V Training Manual, Tab H at 6. The term "within reasonable time," therefore, should be replaced with a defined period of time for a response (e.g., *"The Permittee shall furnish to IDEM, OAQ, within thirty (30) days unless a different period of time is expressly specified by IDEM in its request, any information…."*)

**Response 39:** Condition B.7 is titled Duty to Provide Information. The term discussed in the comment is in the first sentence of 326 IAC 2-7-5(6)(E) and will not be changed until this rule is revised otherwise. Generally, the term is meant to provide flexibility. IDEM prefers to define the amount of time given to a Permittee in the actual request for information, on a case by case basis. Because this phrase is carried over as it is in the rule, changes will not be made to this condition as suggested by the comment above.

**Comment 40:** Source Operation Conditions, C.11(c) – page 23 of 64
The term "a reasonable written explanation" found at the second to the last line of this subsection presents practical enforceability issues because such a requirement is too subjective to be practically enforceable. See EPA Title V Manual, Tab H at 6. The term "a reasonable written explanation," therefore, should be augmented with a specific description of the appropriate information necessary to support an extension request (e.g., "*A reasonable written explanation shall include a description of the obstacles encountered by the Permittee that make the submission of such*

*test reports to IDEM in a timely manner impracticable and a firm line as to when such information will be submitted to IDEM.").*

**Response 40:** Condition C.11 is titled Performance Testing [326 IAC 3-6]. IDEM supports using the phrase "a reasonable written explanation" in the condition, as it is exact language found in rule 326 IAC 3-6-4(b). Any Permittee asking for an extension that does not include "a specific description of the appropriate information necessary to support an extension request" would delay the review until it is furnished, or IDEM would inform them that their request is denied. As with any extension request, IDEM would not grant an extension without sufficient review and consideration. The phrase suggested above does not add further meaning or clarity to the current rule language, and should be submitted as a comment should 326 IAC 3-6 be open for comment during a future rulemaking. Because this phrase is directly from the rule, the requested change above will not be made to part (b) of this condition.

**Comment 41:** Source Operation Conditions, C.19(a) – page 25 of 64
This subsection does provide a deadline of ninety (90) days deadline for submission of the Compliance Response Plan ('CRP") to IDEM, OAQ, upon request. The second line of this subsection should be revised by inserting "*within fourteen (14) days*" after "upon request." Fourteen days is an adequate time.

**Response 41:** Condition C.19 has since been rewritten and renamed as shown in Revision 15 of this document. The condition never specified a ninety day submittal deadline for the CRP. The Permittee was given ninety days to prepare the CRP after issuance of their Part 70 operating permit. The newly rewritten condition no longer requires the ninety day preparation deadline, or that a "CRP shall be submitted to IDEM upon request".

**Comment 42:** Source Operation Conditions, C.19(a)(1) and (2); C.19(b)(1), (2), and (4) – page 25 of 64
The term "reasonable response steps" found throughout this subsection presents practical enforceability issues because such a requirement is too subjective to be practically enforceable. See EPA Title V Training Manual, Tab H at 6. Moreover, the term "expected" in the second line of subsection C.19(a)(1) renders this requirement unenforceable. Accordingly, subsection C.19(a)(1) should be replaced with the following text;

Response steps that shall be taken in the event that the corrective action is required by Section D of this permit and specified time frame for taking such corrective actions.

Additionally, the term "reasonable" should be deleted throughout the remainder of the subsection and replaced with the term "adequate."

**Response 42:** Condition C.19 has since been rewritten and renamed as shown in Revision 15 of this document. Part (d) of the rewritten condition is the only part that refers to "response steps". Expecting the Permittee to take "reasonable response steps" is not too subjective and does not present practical enforceability issues. If enforcement actions needed to be taken for any abnormal situation, it would not be the response step that would be the decisive factor in this action, but any violation occurring as a result of not taking a response step. The violation of an emission limitation, work practice plan, or any compliance determination condition in the permit, would be cause for enforcement action, not the response step in and of itself. Generally, a determination is not made if a response step is reasonable or not, unless a violation is the result of incorrect action. The term "reasonable" is subject to the discretion of IDEM, as would be the term "adequate". In addition, the word "reasonable" is used throughout the rules cited in this condition's title line. Therefore, no changes have been made to this condition based on the comment above.

**Comment 43:** Source Operation Conditions, C.19(b)93) – page 25 of 64
The term "promptly" found in the third line of this subsection presents practical enforceability problems because such a requirement to promptly notify IDEM, OAQ, of the expected date of the shut down is "[w]ithout an outer limit defined in the permit" thereby shifting the burden to the permit authority or the public to prove that the permittee could or should have acted sooner. See EPA Title V Training Manual, Tab H at 5. The term "promptly" should be augmented to include an outer time limit for providing notice to IDEM, OAQ, of emission unit or control device shut down to IDEM (e.g., "*IDEM, OAQ shall be promptly notified no later than one week after the Permittee knew or should have known of the impending shut down and in no event later than twenty-four hours after shut down….*").

**Response 43:** Condition C.19 has since been rewritten and renamed as shown in Revision 15 of this document. The term "promptly" is no longer used in this condition. Therefore, the phrase suggested above will not be added.

**Comment 44:** Source Operation Conditions, C.19(d) – page 25 of 64
The term "reasonable steps" is vague and ambiguous and should be replaced with "all appropriate steps necessary to achieve and maintain compliance with applicable permit conditions."

**Response 44:** Please see Revision 15. As noted previously, the term "reasonable" is used throughout the rules cited in the title line for condition C.19, therefore, it is not necessary to replace this term in the Part 70 operating permit as suggested above.

**Comment 45:** Source Operation Conditions, C.20(a) – page 26 of 64
The term "appropriate" found in the third and fourth line of this subsection is vague and ambiguous and should be replaced with the term "necessary." More troubling, this subsection may be used by the Permittee as a defense to an enforcement action to compel compliance with the applicable emission limitation brought by IDEM, EPA or members of the public. At a minimum, "to achieve compliance with the permit condition in an expeditious manner" should be inserted after "response actions" in the third line, and in the fifth line after "affected facility."

Finally, the sentence should be added to the end of this subsection to make clear that the Permittee remains liable for failure to comply with applicable emission limitations and is bound by requirements of the Compliance Assurance Monitoring ("CAM') rule set forth at 40 C.F.R. Sec. 64.7(d): "*Implementation of appropriate response actions does not relieve the Permittee of its legal obligation to comply with all applicable requirements under the Clean Air Act including application of good air pollution control practices for minimizing emissions.*"

**Response 45:** Condition C.20 is titled Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]. Because the term "necessary", as suggested above, is also vague and ambiguous, and does not add further clarity to this sentence or condition part, it will not be used to replace the term "appropriate". The Permittee may not use this condition defensively because part (c) of this condition states "IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests". Part (a) informs the Permittee of Part 70 operating permit responsibilities they need to employ when required stack testing demonstrates noncompliance. Prior to the Part 70 operating permit program, these additional responsibilities did not exist. Because the applicable emission limitations are listed in the permit and enforceable, it is not necessary to add further clarity as suggested in the last sentence of the comment above. As a result, no changes will be made to this condition.

**Comment 46:** Source Operation Conditions, C.22(a) – page 27 of 64
The term "within a reasonable time" found in the last line of this subsection presents practical enforceability issues such a requirement to furnish information to the Commissioner "within a reasonable time" is too subjective to be practically enforceable. See EPA Title V Training Manual, Tab H at 6. the term "within a reasonable Time," therefore, should be replaced with a defined period of time for a response (e.g., *"[T] Permittee shall furnish the records to the Commissioner within fourteen (14) days of the Commissioner's request."*).

**Response 46:** Condition C.22 is titled General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]. The phrase "within a reasonable time" will not be replaced as suggested above. The purpose of using this phrase is so that IDEM may use its discretion when requesting information not readily available by the Permittee. In cases where the information requested is stored at another location, or information older than three years, fourteen days may not be a logical timeframe. As a result, no change is necessary.

**Comment 47:** Facility Operation Conditions, D.1.6(c) – page 30 of 64
The term "would normally be expected to cause the greatest emissions" found in the second line of this subsection presents practical enforceability problems because such a requirement is subject to interpretation. The language may place the burden on IDEM, EPA or the public to show that the permittee's opacity readings are not representative of the greatest emissions from the source. The permit, therefore, should specify when and where opacity readings shall be taken by the permittee at the Continuous Annealing and Pickling Line ("APL") to assure that such readings meet the monitoring requirements of the Clean Air Act (see, e.g., Clean Air Act Sec. 504(c), 42 U.S.C. Sec. 7661c(c), and the CAM rule at 40 C.F.R. Sub Sec. 64.3 and 64.4). This recommended approach appears to be utilized in the permit at D.4.8 for the Continuous Galvanizing Line (CGL").

Facility Operations, D.2.6(c) – page 33 of 64
The term "would normally be expected to cause the greatest emissions" found in the second line of this subsection presents practical enforceability problems because such a requirement is subject to interpretation. This language may place the burden on IDEM, EPA or the public to show that the permittee's opacity readings are not representative of the greatest emissions from the source. The permit, therefore, should specify when and where opacity readings shall be taken by the permittee at the Continuous Annealing and Pickling Line ("APL") to assure that such readings meet the monitoring requirements of the Clean Air Act (See, e.g., Clean Air Act Sec. 504(c), 42 U.S.C. Sec. 7661c(c), and the CAM rule at 40 C.F.R. Sub Sec. 64.3 and 64.4). This recommended approach appears to be utilized in the permit at D.4.8 for the Continuous Galvanizing Line ("CGL").

Facility Operations, D.3.6(c) – page 37 of 64
The term "would normally be expected to cause the greatest emissions" found in the second line of this subsection presents practical enforceability problems because such a requirement is subject to interpretation. This language may place the burden on IDEM, EPA, or the public to show that the permittee's opacity readings are not representative of the greatest emissions from the source. The permit, therefore, should specify when and where the opacity readings shall be taken by the permittee at the Continuous Annealing and Pickling Line ("APL") to assure that such readings meet the monitoring requirements of the Clean Air Act (see, e.g., Clean Air Act Sec. 504(c), 42 U.S.C. Sec. 7661c(c), and the CAM rule at 40 C.F.R. Sub. Sec. 64.3 and 64.4). This recommended approach appears to be utilized in the permit at D.4.8 for the Continuous Galvanizing Line ("CGL").

**Response 47:** Conditions D.1.6, D.2.6, and D.3.6 were all titled Visible Emissions Notations. They have been renumbered as a result of deleting the Preventive Maintenance condition in each Section D. They are now listed as D.1.5, D.2.5, and D.3.5. These conditions are compliance monitoring conditions which are meant to provide the Permittee with a general idea (normal or abnormal) regarding the performance of the noted particulate emitting equipment while it is in operation. The term "would normally be expected to cause the greatest emissions" is not subject to interpretation and does not place burden on IDEM, EPA, or the public to show that the Permittee's daily visible emissions readings (in cases of batch or discontinuous operations) are not representative of the greatest emissions from the specified stack. These notations are not opacity readings as suggested in the second sentence of the comment. The Visible Emissions Notations conditions are placed under the Compliance Monitoring portion of the section, and not under Compliance Determination, because the burden is on the Permittee and the notations themselves are not numerical data, but only indicators that the Permittee may need to take reasonable response steps in a situation when there are abnormal emissions. The burden has always been placed on the Permittee to show that they have been conducting visible emission notations on batch or discontinuous operations during the time of the operation that releases the "greatest emissions", because the Permittee is most familiar with the normal operation of their processes. Visible emission notations are not the only means of monitoring for these control devices. Depending on the type of control unit, the Permittee must also perform other monitoring so they can demonstrate continuous compliance with the provisions of the operating permit.
Condition D.4.8 (Continuous Emissions Monitoring), now listed as D.4.7, is an entirely different means of measuring PM emissions, and it is not appropriate to compare this requirement to a compliance monitoring provision requiring visible emission notations. As a result, no change is necessary for condition D.4.7.

**Comment 48:** Facility Operations Conditions, D.3.7(a) – 37 of 64
The term "should" in the third line of this subsection presents practical enforceability problems because "[s]"hould indicates a preference, rather than a requirement, and is not appropriate for permit conditions unless the underlying applicable requirement contains provisions that are not mandatory but are recommendations only." EPA Title V Training Manual, Tab H at 6. We recommend, therefore that the term "should" be replaced with either "shall" or "must" to satisfy the requirements of Sec. 504(c) of the Clean Air Act, 42 U.S.C. Sec. 7661c(c).

**Response 48:** Condition D.3.7 is now D.3.6, and is titled Parametric Monitoring. As recommended by the comment above, the term "should" has been replaced with "shall". This is now consistent with the other parametric monitoring conditions of this permit, and the requirement set forth in condition D.3.10 (now D.3.9), Record Keeping Requirements, part (b), which now states "…the Permittee shall maintain once per day…." The second sentence of condition D.3.6 now reads as:

> Pursuant to this permit, these ~~should~~ **shall** be recorded at least once per ~~shift~~ **day** when in operation.

Please see Responses 8 and 15 regarding the frequency change above to "once per day".

**Comment 49:** Facility Operation Conditions, D.5.10(a) – page 47 of 64
The term "should" in the third line of this subsection presents practical enforceability problems because "[s]"hould indicates a preference, rather than a requirement, and is not appropriate for permit conditions unless the underlying applicable requirement contains provisions that are not mandatory but are recommendations only." EPA Title V Training Manual, Tab H at 6. We recommend, therefore, that the term "should" be replaced with either "shall" or "must" to satisfy the requirements of Sec. 504(c) of the Clean Air Act, 42 U.S.C. Sec. 7661c(c).

**Response 49:** Condition D.5.10, now D.5.9, is titled Record Keeping Requirements [326 IAC 2-7-5(3)] [40 CFR 63.346]. The term "should" will not be replaced because this is rule language directly from 40 CFR 63.346(b)(1). As a result, no change is necessary.

**Comment 50:** Recordkeeping and Public Availability of Permittee Records
The General Recordkeeping Requirements set forth at C.22(a) (page 27 of 64) of the draft AK Steel Rockport Works Title V permit specify that "[r]ecords of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application." However, within the facility Operation Conditions of the draft AK Steel Rockport works Title V permit certain records that show compliance with applicable permit conditions are required to be kept for only 36 months. See, e.g., Draft AK Steel Rockport Works Title V permit subsections D.1.13(c) and (d), D.3.10(c), D.4.16(c). We recommend that the five year recordkeeping requirement be applied to all records required to be maintained by the permittee under this operating permit for consistency purposes. Moreover, a five year record retention requirement is more appropriate than a three year record retention requirement in light of the five year statute of limitations for enforcement actions under the Clean Air Act. See 28 U.S.C. Sec. 2462.

Additionally, we request that the draft AK Steel Rockport Works Title V permit clarify the scope of the records that will be made available to the public as emissions data pursuant to section 114(c) of the Clean Air Act. Our experience has been that certain permittees have broadly asserted confidential business information ("CBI") or trade secret claims in an apparent effort to stymie the public's right to review such documentation and meaningfully participate in the Title V permit process as required by section 502 (c) of the Clean Air Act, 42 U.S.C. Sec. 7661a(b)(8) and federal regulations set forth at 40 C.F.R. Sec. 70.8(h). Such opportunities for public participation are materially compromised and in effect rendered meaningless if the public is not allowed to review permittee records that constitute emission data as defined by EPA (see EPA Policy on Public Release of Certain Emission Data, 56 Fed. Reg. 7042 (Feb. 12, 1991). Moreover, clear delineation of the public availability of the records submitted by the permittee will minimize the potential for misunderstanding and disputes in the future.

**Response 50:** Conditions D.1.13 and D.3.10, now D.1.12 and D.3.9, are titled Record Keeping Requirements. Condition D.4.16, now D.4.15, is titled NOx Monitoring System Downtime. Because D.4.15 does not have a part (c) as mentioned above, the comment most likely was meant to reference D.4.17 (now D.4.16), Record Keeping Requirements. Condition C.22 is titled General Record Keeping Requirements. It is not understood why it is believed that "within the facility Operation Conditions of the draft AK Steel Rockport works Title V permit certain records that show compliance with applicable permit conditions are required to be kept for only 36 months." None of the referenced condition parts specify 36 months. In condition C.22, part (a) states that "Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request." Therefore, the recommendation above "that the five year recordkeeping requirement be applied to all records…" has already been appropriately stated as a requirement in this operating permit. Please note that the records must be retained onsite for 3 years (36 months), and may be moved and kept at another location for the remaining 2 years if the Permittee wishes. As a result, no change is necessary.

Regarding confidential information, emissions data does not qualify as confidential business information or trade secret information by a Permittee. Therefore, the public is allowed to review Permittee records that constitute emission data as defined by EPA. Please note that a non-rule policy document exists regarding emissions data. It is titled "Guidance for the Interpretation of the Term Emissions Data", and is numbered as Air-031. This document can be found online at www.in.gov/idem/rules/policies/index.html.

**Comment 51:** Conclusion
The Draft Title V Permit for the AK Steel Rockport Works is legally and technically deficient as presently proposed. We urge IDEM to incorporate the comments raised herein to ensure that this permit meets the requirements of the Clean Air Act and applicable federal and state regulations. Thank you for the opportunity to comment on the Draft Public Notice of this Title V Permit.

**Response 51:** IDEM is submitting the attached Part 70 operating permit to EPA for review based on the provisions set by the Part 70 operating permit program, and requirements of the Clean Air Act. The majority of the commented suggestions by the Hoosier Environmental Council, Indiana Division Izaak Walton League of America, Protect Our Woods, Save Our Rivers, Save Our Land & Environment (SOLE), and Valley Watch, Inc., were not incorporated because they did not provide adequate technical or legal support to validate their claims that the draft Part 70 operating permit for AK Steel Rockport Works is legally and technically deficient.

**Comment 52:** On March 30, 2004, Don Mottley, spokesperson for Save Our Rivers, submitted the following written comments (in this document these comments are numbered 52 to 57) at the public hearing:

I will start out by thanking your agency for holding this Public Hearing. This is my first Title V Hearing. I have tried to educate myself by reviewing other individual comments on Title V permits and borrowing some ones EPA Title V Training Manual. My first question is how we can get a Title V Training session held in Southwest Indiana so that more individuals can understand the Title V permitting.

I started out reviewing a Pre-Public Notice Draft dated: 02-03 it had 70 pages in it. So one must ask what happened to six (6) pages of the Draft Permit we have now since it only has 64 pages. I have seven (7) items to add to the comments that I have already submitted. These are items that were not found in the last Draft issued. I will not read those now but, would ask that your agency respond to those comments. Thank you.

**Response 52:** Over the past several years, IDEM, EPA, and the Earth Day Coalition have co-sponsored citizen workshops on both the Title V and the New Source Review permitting programs. No additional workshops are scheduled at this time, however IDEM would be pleased to work with citizens to put together a class in Southwest Indiana. For more information, please contact Joanne Smiddie-Brush, Director, Public Participation, at 317-233-0185 or email her at jbrush@idem.in.gov.

Information regarding public participation in the permitting process is available on the Internet at http://www.in.gov/idem/your_environment/community_involvement/index.html. Other information found online about the permitting process includes "The Proof is in the Permit" produced by EPA and the New York Public Interest Research Group (NYPIRG) at http://www.epa.gov/oar/oaqps/permits/partic/proof.html, and "The Plain English Guide to the Clean Air Act" at http://www.epa.gov/oar/oaqps/peg_caa/pegcaain.html.

Also, in preparation for the public notice of steel mill Title V operating permits, OAQ solicited input from citizens located in the Northwest and Southwest regions of Indiana regarding their interest in having a Title V operating permit seminar for the public review of Title V permits. A seminar such as this did not take place in Southwest Indiana because OAQ did not receive feedback requesting one.

Several deletions were made to the draft permit which affected the page numbering of the draft. As a result, the draft that was put on public notice had fewer pages than the previous working versions. The changes made between draft stages were not technical, but administrative.

**Comment 53:** Under General conditions, B.7 (a) – page 11 of 70
The term “promptly” found in the second line of this subsection presents a practical enforceability problem because such a requirement to submit promptly supplementary facts or corrected information to IDEM is “without an outer limit defined in the permit” Thereby shifting the burden to the permit authority or the public to prove that the permittee could or should have acted sooner. See EPA Title V Training Manual, Tab H at 5. The term “promptly” should be augmented to include an outer time limit for submission of supplementary or corrected information to IDEM (e.g., “The Permittee… shall promptly but no latter than one week after the Permittee knew or should have known of omitted or incorrect information submit such supplementary facts or corrected information…”).

**Response 53:** Condition B.7 is titled Duty to Supplement and Provide Information. This condition was revised after the unofficial February 2003 draft and before the draft that was on public notice. As a result, the comment above is no longer valid, as the term “promptly” is no longer used in this condition.

**Comment 54:** Under General conditions, B.11 (c) – page 13 of 70
The term “within a reasonable time” found in the first line of this subsection presents practical enforceability issues because such a requirement to finish information to IDEM “within a reasonable time” is too subjective to be practicably enforceable. See EPA Title V Training Manual, Tab H at 6. The term “within a reasonable time,” therefore, should be replaced with a defined period of time for a response (e.g., “The Permittee shall furnish to IDEM, OAQ, within thirty (30) days unless a different period of time is expressly specified by IDEM in its request, any information…”).

Under General conditions, B.11 (d) – page13 of 70
The term “within a reasonable time” found in the last line of this subsection presents practical enforceability issues because such a requirement to furnish information to the Commissioner “within a reasonable time” is too subjective to be practically enforceable. See EPA Title V Training Manual, Tab H at 6. The term “within a reasonable time,” therefore, should be replaced with a defined period of time for a response (e.g., “The Permittee shall furnish the records to the Commissioner within fourteen (14) days of the Commissioner’s request.”).

**Response 54:** This condition is titled Preventive Maintenance Plan, and is numbered B.10 in the public notice draft. The term “within a reasonable time” is meant to provide flexibility. IDEM prefers to define the amount of time given to a

Permittee in the actual request for information, on a case by case basis. The terms of the request sent to the Permittee would define the period of time which would then be enforceable. The phrase "within a reasonable time" is now found in part (b) of this condition due to changes made to this condition under Revision 4 of this document.

**Comment 55:** General conditions, B.12 (b)(3) and (6) – page 14 of 70 and page 15 of 70
The term "all reasonable steps" found in the first line of this subsection presents practical enforceability issues because such a requirement is too subjective to be practically enforceable. See EPA Title V Training Manual, Tab H at 6. The term "all reasonable steps," therefore, should be replaced with a description of the specific steps that must be taken by the Permittee to minimize levels of emissions during an emergency. At a minimum, the permit should provide specific and concrete examples of the steps that should be taken to minimize levels of emissions to perfect this affirmative defense (e.g., plant shutdown; reduction of production).

General conditions, B.12 (g) – page15 of 70
The term "all reasonable steps" found in the last line of this subsection presents practical enforceability issues because such a requirement is too subjective to be practically enforceable. See EPA Title V Training Manual, Tab H at 6. The term "all reasonable steps," therefore, should be replaced with a description of the specific steps that must be taken by the Permittee to minimize levels of emissions during an emergency. At a minimum, the permit should provide specific and concrete examples of the steps that should be taken to minimize levels of emissions to protect this affirmative defense.

**Response 55:** B.12 in the working draft is titled Emergency Provisions. This condition is numbered B.11 in the public notice draft. The term "all reasonable steps" is found in the rule 326 IAC 2-7-16, Emergency Provisions. As a result, this phrase will not be replaced as suggested above. Please see unrelated changes made to part (e) of this condition under Revision 4 of this document.

**Comment 56:** General conditions, B.13 (c) – page 15 of 70
The term "in the exercise of reasonable care" found in the last line of this subsection presents practical enforceability issues because such a requirement is too subjective to be practically enforceable. See EPA Title V Training Manual, Tab H at 6. The term "in the exercise of reasonable care," therefore, should be deleted.

**Response 56:** Condition B.13 is titled Permit Shield. This is condition B.12 in the public notice draft. The term "in the exercise of reasonable care" does not present practically enforceable issues, because it is used to better define "erroneous information".

**Comment 57:** General conditions, B.20 (a)(5) – page 19 of 70
The term "upon reasonable request" found in the last line of this subsection presents practical enforceability issues because such a requirement is to subjective to be practically enforceable. See EPA Title V Training Manual, Tab H at 6. The public right to review these documents cannot be limited by the Permittee's interpretation as to what constitutes a "reasonable request." See Clean Air Act 502(b)(8), 42 U.S.C. 7611a(b)(8). The scope of the records that may be requested by the public is already expressing defined by this subsection. The Permittee, therefore, requires no additional limitation - particularly a subjective limitation without any specified standards - on the categories of documents that may be requested by the public. Additionally, this subsection should make clear that the on-site records identified therein constitute emission data identified at section 114(c) of the Clean Air Act; hence, such records are subject to public release irrespective of any confidential information ("CBI") or trade secret claim.

**Response 57:** Condition B.20 is titled Operational Flexibility. The term "upon reasonable request" is found in the rule 326 IAC 2-7-20 Operational Flexibility. This phrase is used in conjunction with "availability", and is not open for interpretation by the Permittee since any request would state a deadline by which the information should be submitted. As a result, no changes have been made as suggested above. However, minor changes have been made to several parts of this condition as noted below.

Part (a)(3) is revised to read as:

> The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

The first sentence of part (5) now reads as:

The Permittee maintains records on-site **which document**, on a rolling five (5) year basis, ~~which document,~~ all such changes and emission~~s~~ trad~~ing~~**es** that are subject to 326 IAC 2-7-20(b), (c), or (e)**.** ~~and~~ **The Permittee shall make~~s~~** such records available, upon request, for public view.

And part (c) is changed to read as:

The Permittee may trade **emissions** increase and decreases ~~in emissions in~~ **at** the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

**Comment 58:** Prior to the public hearing, the following written comments were submitted by citizens:

Tim Duncan
I am a resident of Spencer County, Indiana, living less than a half mile from AK Steel's Rockport Works. I have read the AK Steel application for a Part 70 permit at the Rockport Library.

I have very serious concern about the extremely high levels of air pollution AK Steel is releasing into the local environment. The hundreds of people living within a few miles of this steel mill and the thousands of people living in the area ought to have a chance to voice similar concerns and to hear all sides of the issue addressed.

I am, therefore, requesting a public hearing on the Part 70 No.: T147-11043-00041 permit application.

Richard and Betty Michel
We are responding to the Title V air permit for AK Steel. After viewing the permit, we still don't understand all of the details and ramifications of the plan for neighboring homeowners. We would like to have an evening public hearing in the Rockport area to discuss this air permit.

We are the closest neighbors (with no buffer zone) to the facility on the North East corner where most of the emissions occur. On several occasions we have witnessed and reported a yellow plume coming from different stacks on different buildings. Often, we detect an unusual and acrid odor coming from the facilities.

Please allow the residents of Spencer County a public hearing so we may better understand why AK Steel is allowed to be the #1 Toxic Polluter in the state and so we know what to expect and how to protect our health.

(Richard and Betty Michel also submitted additional written comments at the public hearing. Their concerns have been responded to in the hearing section of this permit.)

Lester and Delilah Purviance
We would like to express our concern about the pending Part 70 Permit for AK Steel Corporation in Spencer County. Our home is within sight of the currently operating plant, and we are experiencing what we consider air quality problems already, before any more industrial activity is added to our area.

For example, recently, I, Lester, mowed my lawn and felt it necessary to wear a mask to filter the air as I worked. Even wearing the filtering mask, I experienced a considerable amount of black pollutants in my nasal passages after my tasks outside were finished. Also, I noticed that my lawnmower was covered with black residue around the bottom where it came into contact with the grass. Furthermore, we had already noticed that, even just walking across the lawn, our shoes were soiled with the same black residue. I have not yet cleaned my mower, saving the pollution as proof to any who might doubt my word.

If this is what I am encountering after a period of days without rain which helps to cleanse my lawn of pollutants, I wonder what the situation might be if even more industry is allowed to add its air pollution to what is already here.

We want to add our own protests to those you have undoubtedly received, and we also want to request that a public hearing be scheduled during the evening hours, when those of us who work days can be present to make our concerns known.

Thomas Utter of LincolnIand Economic Development Corporation
AK Steel Corporation's Part 70 Permit application #T147-11043-00041, which includes MG Industries and Precision Strip, Inc. in Spencer County, Indiana appears to outline both the applicant's intentions and the applicant's plan to operate within IDEM guidelines.

Through their past and ongoing business activities, the AK Steel Corporation, MG Industries and Precision Strip, Inc. have already proven to possess the expertise, the resources and the will to operate in compliance with IDEM standards. These corporations have fully cooperated with my office regarding explanations about environmental matters. I therefore, endorse their Part 70 application referenced above.

**Response 58:** The public hearing was held on March 30, 2004, during the evening hours. Please see the response to hearing comments regarding the air pollution concerns for AK Steel and Spencer County.

With regards to the black residue issue at the Purviance residence, it should be noted that this is characteristic of particulate formed during combustion of coal. AK Steel does not operate coal combusting activities at its Rockport site. In addition, the Part 70 operating permit is not an approval for any new pollution emitting activities to be constructed at AK Steel Rockport Works.

All air pollution complaints for Spencer County should be called in to the IDEM Southwest Regional Office at (812)380-2316, or toll free within Indiana at (888)672-8323, during the problem occurrence or as soon as possible. The air compliance inspector for Spencer County is Derrick Ohning.

**Comment 59:** The following written comment was received at the public hearing:

Paul McDaniel
Hi, I would like an answer to my questions.

1. In my home what kind of air cleaner can an individual homeowner purchase that would remove chemicals from the air like those AK Steel puts into the air?
2. What resperator can an individual purchase that would filter the particulants and gas in the air so that a person would not be exposed to the chemicals and particulants while mowing and outside?

I am concerned that a company would be allowed to release to the air so many gases and chemicals and I think I should be able to protect myself in the proper way from this pollution.

**Response 59:** IDEM does not have the authority to endorse or recommend products for consumer use.
**********

**SUMMARY OF MARCH 30, 2004, PUBLIC HEARING COMMENTS**

The following is a summary of comments taken from the public hearing transcript. This hearing was held on March 30, 2004 at the Youth and Community Center in Chrisney, Indiana. The following IDEM OAQ staff were present at the hearing: Gurinder Saini, Hearing Officer; Melissa Groch, Permit Writer of the AK Steel Part 70 operating permit; Scott Anslinger, Air Compliance Inspector (Southwest Regional Office) assigned to AK Steel; and Susan Newton, OAQ Administration Section.

Because the public hearing comments were all related to several general concerns about AK Steel and Spencer County (permitting status, compliance status, air toxics, ambient monitoring, cancer rates and risk, pollution rankings), they have been summarized accordingly, and responded to using information found through researching the topics discussed at the hearing.

**Hearing comments regarding AK Steel's air permitting, air compliance status, and county location:** In general, citizens expressed concerns about the level of permits AK Steel has received, and if they are complying with the air quality regulations.

**IDEM's Response:** IDEM is required to issue Title V (Part 70) operating permits to every major source, regardless of their compliance status. The Clean Air Act requires all major sources of air pollution to apply for and obtain a Title V permit. The Title V operating permit for AK Steel does not allow any new emission units to be constructed or operated. This operating permit consolidates all the previous air permits for AK Steel into one single permit document. The operating permit also establishes compliance monitoring provisions, which requires AK Steel to monitor their emissions and pollution control equipment to assure proper operation and compliance with the emission limits in the permit. This operating permit also establishes a schedule for specific emission units to be stack tested once every five years. During a stack test, emissions are measured to determine compliance with the emission limits in the permit. AK Steel also had stack testing provisions included with their initial construction permit.

Regarding compliance issues with AK Steel, current IDEM records show that they have not incurred any new violations with air quality regulations since December 2000. All previous violations have been resolved as noted in the Technical Support Document (TSD) included with the Title V operating permit.

**Hearing comments regarding air quality around AK Steel and in Spencer County:** General concerns were expressed about the air quality (Toxic Release Inventory) in Spencer County and around AK Steel Rockport Works. Also, several people at the hearing mentioned that AK Steel came into the county under secrecy.

**IDEM's Response:** In response to these concerns, IDEM's OAQ, Program and Planning Section, has researched data from the TRI (Toxics Release Inventory) and compiled the information (as of October 2004) on these issues in summary below based on topic. Additionally, it should be noted that IDEM does not have jurisdiction over local zoning ordinances and regulations. This issue should be addressed to the Spencer County local government. For major sources such as AK Steel, IDEM is required to place draft permits on public notice and respond to comments that pertain to that particular permit.

TRI Data (www.in.gov/idem/prevention/tri/index.html and www.epa.gov/tri)
AK Steel's first year of reportable releases are found in the 1998 Toxics Release Inventory, or TRI, report. As recorded in the TRI, AK Steel's total releases were 14,188,641 pounds for the year 2001. Of those releases, air emissions released for 2001 were 13,901 pounds (7 tons), all of which were stack emissions. The majority of the releases reported to the TRI for AK Steel were surface water discharges (14,174,740 pounds). Four Spencer County companies comprised the 2001 inventory for that county. The county's highest reported air toxic emissions for 2001, were from the American Electric Power (AEP) Rockport Plant, which reported 1,966,292.7 pounds (983.1 tons) of air emissions for the year 2001. For the year 2002, the TRI total releases for AK Steel is reported as being 20,200,112 pounds with air emission releases of 14,221 pounds (7.1 tons).

As noted in the The Toxics Release Inventory (TRI) and Factors to Consider When Using TRI Data brochure located electronically at www.epa.gov/tri, some key factors to consider when using TRI data, include:

- Toxicity varies among the covered chemicals; data on amounts of the chemicals alone are inadequate to reach conclusions or formulate policy;
- The presence of a chemical in the environment must be evaluated along with the potential and actual exposures and the route of exposures, the chemical's fate in the environment, and other factors before any statements can be made about potential risks associated with the chemical or a release;
- Many options for managing production-related wastes are subject to stringent technical standards and exacting state and federal regulatory oversight;
- Regulatory controls apply to many of the releases reported that are production related; reporting facilities must comply with environmental standards in addition to reporting residual releases; and
- Some reporters send chemicals off-site in waste to be managed at specialized waste management facilities that are also reporters; adjustments must be made to avoid double counting.

The factors above are discussed in greater detail in the main body of the paper.

1997 to 1998 Increase in Spencer County TRI Data
A hearing comment noted that TRI data showed an increase in air emission releases from Spencer County from 552,150 pounds in 1997 to 2,269,821 pounds in 1998, after AK Steel started operation. These numbers are accurate, however, they are a result of a TRI policy change affecting which facilities were required to report TRI data, and what chemicals were required to be reported. This happened as a result of the AEP (Indiana Michigan Power) Rockport Plant in Spencer County being required to report annual air emissions starting in 1998. Comparing the 1997 Spencer County values to the 1998 values is not logical unless this difference is taken into account.

| AK Steel Air Emission Releases | |
|---|---|
| **Year** | **Pounds/year** |
| 1998 | 4,200 |
| 1999 | 16,018 |
| 2000 | 15,801 |
| 2001 | 13,901 |
| 2002 | 14,221 |

Pollution Rankings by State and County (www.scorecard.org)

Year 2002 data from www.scorecard.org rates Jefferson County Ohio the most polluted county in the United States for air emissions (20,749,509 pounds of air emissions released). Gibson County Indiana was the highest ranked Indiana county, ranking 40th nationally, with recorded air emissions of 7,060,260 pounds. Warrick County ranked 55th nationally with 5,991,981 pounds air emission releases. Spencer County was not ranked in the top 100 nationally. Spencer County does rank 15th nationally for total TRI chemical releases. This value includes all chemicals that were discharged, including those discharged to water treatment plants and those hauled off to hazardous waste landfills. These values do not reflect exposure risks for citizens of Spencer County.

Cancer Risk (www.scorecard.org)
Indiana ranks 12th nationally in average individual's added cancer risk according to www.scorecard.org. California ranks 4th nationally. Illinois and Ohio rank 10th and 11th respectably, and Kentucky ranks 8th.

Although industry in Indiana emits 3,553,728 pounds (1,777 tons) of recognized carcinogens into the air compared to 905,254 pounds (453 tons) of air releases from California, Indiana is comparable with many of the other Midwestern states for these types of emissions.

| State | Pounds/year |
|---|---|
| Indiana | 3,553,728 |
| Ohio | 3,073,306 |
| Illinois | 2,883,737 |
| Michigan | 2,210,624 |
| Kentucky | 2,033,624 |

Los Angeles County comparison and Gibson Station and ALCOA
According to the TRI, the following sources had reported air emissions of:

Cinergy Gibson Generating Station, Princeton Indiana – 5,282,448 pounds of TRI air releases.
ALCOA Inc, Warrick operations, Newburgh Indiana – 1,579,584 pounds of TRI air releases.
Los Angeles County, California – 2,530,210 pounds of TRI air releases.

It is important to note that when looking at these numbers, this is a total account of the pounds released with no factors included as to the chemicals' toxicity. These values are also from TRI reporting facilities only. Mobile sources such as diesel trucks and other vehicle missions are not taken into account. It is also important to state that the two facilities listed in Indiana are both power generating stations and that there are no power generating facilities within Los Angeles County. It is hard to do a direct comparison of TRI data from facility to facility unless the chemicals that are released are taken into account. Any conclusions drawn directly from the quantity of pounds from the TRI data without other considerations would be an inaccurate comparison.

Cancer Rates (www.scorecard.org)

| Total Cancer Rates | | | | |
|---|---|---|---|---|
| | Incidence | | Mortality | |
| | Rate | | | |
| Year: | 1999 | 1995-1999 | 1999 | 1995-1999 |
| Area | | | | |
| NATIONAL | 462.9 | 468.9 | 202.8 | 205.7 |
| INIDIANA | 454.4 | 440.0 | 217.6 | 217.8 |
| REGION 9 | 446.9 | 436.9 | 202.2 | 209.9 |
| SPENCER COUNTY* | 439.9 | 427.1 | 186.7 | 192.8 |

* Average of Men and Women Cancer rates based on 51% male: 49% Female (U.S. Census figures for Spencer County)

Cancer Incident and Mortality Rates were obtained from the Indiana Department of Health. Indiana, Region 9 (containing Spencer, Warrick, and Vanderburgh Counties), and Spencer County all contain incident rates below the national average. Overall, Indiana has a higher mortality rate than the national average. Region 9 has a mortality rate that is comparable with the national average and Spencer County is below the national average for mortality.

The primary chemical of concern in regards to air emissions in Spencer County for cancer appears to be emissions generated from the combustion of diesel.

Asthma Rates
The Indiana Department of Health does not have a specific asthma rate listed for Spencer County. Asthma is not listed

as a reportable condition. As a result, it is not required that doctors report the number of asthma patients that they treat, and this makes it difficult for accurate asthma rates to be determined on a county level. To accomplish this, the Behavioral Risk Factor Surveillance System (BRFSS) has been created. The BRFSS is an annual random-dial telephone survey of adults 18 years old or older. It is operated by the Department of Health in coordination with the Center for Disease Control and Prevention. Results for 2002 had insufficient data for Spencer County. There was sufficient data for Warrick and Vanderburgh Counties as well as Allen County. Fort Wayne is located in Allen County and was used as comparable city to Evansville in the public hearing. The neighboring county to Spencer, Warrick County, had an asthma rate of 6.2%. Vanderburgh County, where Evansville is located, had an asthma rate of 8.3%. Allen County, in Northern Indiana, had an asthma rate of 11.5%. The national average for asthma is 5.8 %. It should be noted that Allen, Warrick and Vanderburgh Counties are all listed as non-attainment counties for Ozone in 2004. Further information can be obtained from the Indiana Department of Health by contacting Linda Stemnock at (317) 233-7536 or visiting the Department of Health's webpage at www.in.gov/isdh/index.htm. The Department of Health is not aware of specific asthma rates for children 9-13 being calculated for Evansville or Fort Wayne Indiana as was stated in during the public hearing and would be interested in the source of that information to aid in their information gathering efforts.

Fish Advisory

There is a state wide fish advisory in effect for Indiana concerning Mercury. This advisory is specific to the fish species Carp. Spencer County is under a fish advisory for the Anderson and Ohio Rivers. Most of the advisories are for PCB contaminants. There is a group 3 advisory in effect for Largemouth Bass in the Anderson River. The fish consumption advisory report for all of Indiana including Spencer County can be found on the internet http://fn.cfs.purdue.edu/anglingindiana/. There is also a link that will take users to the EPA website to search other states fishing advisories. Illinois and Ohio have similar state wide fishing advisories.

Coal Fired Power Plants

No information has been found which states that Spencer County is in "the center of the largest concentration of coal fired power plants in the entire world". The facts are that between Indiana and Kentucky, there are 6 coal fired power plants either in Spencer County or in adjacent counties. Other areas along the Ohio River also have large concentrations of coal fired power plants. Specifically, the area around Cincinnati, Ohio has a dense concentration. Indiana, Ohio and Kentucky have a large number of coal fired power plants.

Mercury

IDEM is continuing to push efforts to reduce releases of mercury to the environment. Through programs such as the Thermometer Exchange Program and mercury thermostat collection, IDEM is giving the public a chance to safely eliminate mercury in the home. By working with Dentist offices and Auto salvage yards, IDEM is seeking to better educate and help with the disposal of the mercury that finds its way into these places. IDEM has also started to incorporate mercury emission limits to the rules for Medical Waste Incinerators and Municipal Waste Combustors.

Spencer county pollution (www.scorecard.org)

There were a number of comparisons of Spencer county to other counties nationally and State wide. The following is a table of Spencer County's rank in the State of Indiana for various chemical releases.

**State Ranking of Spencer County of Air Releases (2002)**

| Category | State Rank | Emissions in Pounds | | |
|---|---|---|---|---|
| | | Emissions | #1 ranked county emissions | AK Steel Emissions |
| TRI Chemicals | 14 | 1,942,135 | 7,060,260 | 14,221 |
| Suspected Carcinogens | 30 | 3,602 | 2,271,161 | 1 |
| Recognized Carcinogens | 42 | 2,800 | 1,098,811 | 0 |
| Recognized Developmental Toxicants | 37 | 15,000 | 667,141 | 0 |
| Recognized Reproductive Toxicants | 21 | 950 | 96,001 | 0 |
| Suspected Cardiovascular Toxicants | 25 | 402,156 | 3,405,747 | 1,540 |
| Suspected skin or Sense Organ Toxicants | 11 | 1,886,292 | 7,006,621 | 14,221 |
| Suspected Respiratory Toxicants | 14 | 1,914,797 | 7,048,609 | 14,221 |
| Suspected Reproductive Toxicants | 25 | 418,647 | 3,464,182 | 13,741 |
| Suspected Neurotoxicants | 27 | 419,175 | 3,572,696 | 13,740 |
| Suspected Musculoskeletal Toxicants | 9 | 1,829,540 | 6,743,250 | 1,540 |
| Suspected Gastrointestinal or Liver Toxicants | 9 | 1,815,507 | 5,555,390 | 13,741 |
| Suspected Kidney Toxicants | 50 | 62,028 | 3,215,848 | 1 |
| Suspected Immunotoxicants | 9 | 1,422,281 | 4,762,178 | 1 |
| Suspected Endocrine Toxicants | Not ranked | N/A | 2,330,202 | 0 |
| Suspected Developmental Toxicants | 22 | 386,775 | 2,986,565 | 1,540 |
| Risk from Hazardous Air Pollutants | 74 | 420* | 1200* | |

* Added cancer risk as calculated by www.scorecard.org

While TRI data lists Spencer County as number 1 statewide, www.scorecard.org shows that Spencer County is not listed in the top 100 counties in the United States in any of the above listed categories.

Inspections
Unless there are ongoing enforcement issues with a Title V source, the source is inspected for compliance with their air operating permit once a year. Any air pollution complaints received by IDEM may require surveillance or additional inspections by the inspector assigned to this company.

Summation
In comparison to other reporting sources in the county, AK Steel's air emission releases seem to have a relatively minor impact on the total air quality of Spencer County.

| **Spencer County TRI Air Emissions** | |
|---|---|
| **Facility** | **Pounds/year** |
| AK Steel | 14,221 |
| American Electric Power | 1,868,114 |
| Flexcel | 56,000 |
| Little Sandy No. 10 Mine | 3,800 |

Only 4 chemicals are listed as being released to the air from AK Steel.

| **AK Steel TRI Air Releases** | |
|---|---|
| **Chemical** | **Pounds/year** |
| Ammonia | 12,200 |
| Chromium | 1 |
| Hydrogen Fluoride | 1,540 |
| Nitric Acid | 480 |

Chromium would be considered the most toxic chemical emitted from AK Steel when considering both cancer and non-cancer health effects. However, this facility only had 1 pound of chromium emitted last year. Ammonia is more associated with ecological impacts but does have health effects if an individual is exposed at high levels.
**********

Upon further review, the IDEM Office of Air Quality (OAQ) has made the following revisions to the permit (bolded language has been added, the language with strikeout has been deleted). In addition, although not shown below, The Table of Contents has also been modified to reflect these revisions where necessary.

**Revision 1:** Since the public notice began, there has been a change in the signatory. This only affects the box on the operating permit cover page. The change is as follows:

| Operation Permit No.: T147-11043-00041 | |
|---|---|
| Issued by:<br>~~Janet McCabe, Assistant Commissioner~~ **Nisha Sizemore, Chief Permits Branch**<br>Office of Air Quality | Issuance Date:<br><br>Expiration Date: |

**Revision 2:** Changes in the address have been made throughout the Part 70 operating permit where necessary. The address now reads as:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue~~, P.O.Box 6015~~
Indianapolis, Indiana 4620**4-2251**

**Revision 3:** The following changes have been made to condition B.2 for further clarification:

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] **[326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]**

**(a)** This permit**, T147-11043-00041,** is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

**(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.**

**Revision 4:** IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted part (b) of condition B.10, Preventive Maintenance Plan. Also, so that the condition is more general and applies to the entire source, revisions have been made to part (a). This condition now reads as follows:

(a) ~~If required by specific condition(s) in Section D of this permit, t~~**T**he Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit~~, including the following information on each facility:~~ **for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:**

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

~~If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206~~

~~The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

(b) ~~The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~

~~(c)~~ A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP**s** do~~es~~ not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~(d)~~**(c)** To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

Additionally, because Preventive Maintenance Plans are already addressed in condition B.10, the corresponding condition in each Section D (with the exception of Section D.7) has been deleted because condition B.10 is for the entire source. The affected sections and Table of Contents have been renumbered. Each Section D condition for the Preventive Maintenance Plan previously read as:

~~Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

In some cases, the PMP condition above had referred to the exact name of the facility. For the purposes of this document, it is not necessary to cite each variation of the PMP conditions that were written in this manner.

Since the Preventive Maintenance Plan condition (B.10) was revised above, part (e) of the Emergency Provisions condition (B.11) has been revised as follows:

**The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However,** IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

Additionally, an IDEM telephone number and facsimile number have been updated in condition B.11, Emergency Provisions. These two items are found under (b)(4) of this condition. They both now read as follows:

Telephone Number: 317-233-~~5674~~**0178** (ask for Compliance Section)
Facsimile Number: 317-233-~~5967~~**6865**

These two numbers have also been updated on the Emergency Occurrence Report form of the operating permit.

**Revision 5:** To reflect the wording of 326 IAC 2-7-15(a), condition B.12, Permit Shield, has a deletion in the second sentence of part (a). The sentence now reads as:

The permit shield provides that compliance with the conditions of this permit shall be deemed ~~in~~ compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

**Revision 6:** B.13, has been changed to read as:

Prior Permits Superseded [326 IAC 2-1.1-9.5] **[326 IAC 2-7-10.5]**

(a) All terms and conditions of ~~previous~~ permits **established prior to T147-11043-00041** and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised **under 326 IAC 2-7-10.5**, or

(3) deleted **under 326 IAC 2-7-10.5.**

~~by this permit.~~

(b) **Provided that all terms and conditions are accurately reflected in this permit,** ~~A~~**a**ll previous registrations and permits are superseded by this permit.

**Revision 7:** The following changes have been made to B.16 for clarification:

Permit Renewal **[326 IAC 2-7-3]** [326 IAC 2-7-4] **[326 IAC 2-7-8(e)]**

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(b) ~~Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]~~

~~(1)~~ A timely renewal application is one that is:

(~~A~~**1**) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(~~B~~**2**) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

~~(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.~~

(c) ~~Right to Operate After Application for Renewal [326 IAC 2-7-3]~~
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

~~(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]~~
~~If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.~~

**Revision 8:** It has been decided that part (d) concerning nonroad engines from condition B.17, Permit Amendment or Modification, should be removed. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new. The deletion of part (d) is shown below with strikeout:

~~(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

**Revision 9:** A rule citation has been added to the title line of Condition B.21 as follows:

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] **[IC 13-17-3-2]** [IC 13-30-3-1]

**Revision 10:** In condition B.23 (Annual Fee Payment), part (c) has been revised due to the reorganization and renaming of the OAQ section that handles billing. It now reads as:

The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, ~~I/M &~~ Billing**, Licensing, and Training** Section), to determine the appropriate permit fee.

**Revision 11:** Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule became effective on March 16, 2005. As a result, the following language has been incorporated into the permit as condition B.24 to address this rule:

**B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]**

**For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.**

**Revision 12:** Another new condition, B.25, has been added to the end of Section B. It reads as follows:

**B.25 Term of Conditions [326 IAC 2-1.1-9.5]**

**Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:**

**(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or**

**(b) the emission unit to which the condition pertains permanently ceases operation.**

**Revision 13:** The 326 IAC 6-3 revisions that became effective on June 12, 2002, were approved into the State Implementation Plan (SIP) on September 23, 2005. As a result, the following changes have been made to the condition:

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour ~~[40 CFR 52 Subpart P]~~ [326 IAC 6-3-2]

~~(a)~~ ~~Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

~~(b)~~ Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. ~~This condition is not federally enforceable.~~

**Revision 14:** The last sentence of condition C.5, Incineration, has been deleted because 326 IAC 9 was approved into the Indiana SIP on November 30, 2004, with an effective date of January 31, 2005. Therefore it is no longer necessary to state that 9-1-2 is not federally enforceable. This condition now reads as:

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

**Revision 15:** Condition C.16 has been revised because IDEM realizes that these specifications can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition. This condition now reads as follows:

C.16 ~~Pressure Gauge and Other~~ Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) ~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed~~ **When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device** shall have a scale such that the expected ~~normal~~ **maximum** reading **for the normal range** shall be no less than twenty percent (20%) of full scale ~~and be accurate within plus or minus two percent (2%) of full scale reading~~.

(b) ~~Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.~~

~~(c)~~ ~~The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.~~

~~(d)~~ The Permittee may request **that** the IDEM, OAQ approve the use of ~~a pressure gauge or other~~ **an** instrument that does not meet the above specifications provided the Permittee can demonstrate **that** an alternative ~~pressure gauge or other~~ instrument specification will adequately ensure compliance with permit conditions requiring the measurement of ~~pressure drop or other~~ **the** parameters.

Additionally, all Section D conditions that refer to this condition, have also been revised to reflect the new condition title.

**Revision 16:** IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. As a result, the Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to condition C.19:

~~Compliance Response Plan — Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** [326 IAC 2-7-5] [326 IAC 2-7-6]

~~(a)~~ ~~The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~

~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~

~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~

~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~

~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~

~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~

~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~

~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~

~~(3) An automatic measurement was taken when the process was not operating.~~

~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~

~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.~~

~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

**(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**

**(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**

**(1) initial inspection and evaluation;**

**(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**

**(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**

**(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**

**(1) monitoring results;**

**(2) review of operation and maintenance procedures and records;**

**(3) inspection of the control device, associated capture system, and the process.**

**(d) Failure to take reasonable response steps shall be considered a deviation from the permit.**

**(e) The Permittee shall maintain the following records:**

**(1) monitoring data;**

**(2) monitor performance data, if applicable; and**

**(3) corrective actions taken.**

**Revision 17:** To reflect rule revisions to 326 IAC 2-6, the Emission Statement condition has been revised.

C.21 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) ~~The~~ **Pursuant to 326 IAC 2-6-3(a)(1),** the Permittee shall submit ~~an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received~~ by July 1 of each year ~~and must comply with the minimum requirements~~ **an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information** specified in 326 IAC 2-6-4**(c)**~~. The annual emission statement~~ **and** shall meet the following requirements:

(1) Indicate estimated actual emissions of ~~criteria~~ **all** pollutants ~~from the source, in compliance with 326 IAC 2-6 (Emission Reporting~~ **listed in 326 IAC 2-6-4(a**);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of ~~Part 70~~ fee assessment.

~~(b)~~ The ~~annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission~~ statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue~~, P.O. Box 6015~~
Indianapolis, Indiana 4620**4**~~6 6015~~ **-2251**

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(~~c~~**b**) The ~~annual~~ emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**Revision 18:** Condition C.22, General Record Keeping Requirements, has been updated by adding a part (c) which reads as:

**(c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:**

**(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, document and maintain the following records:**

**(A) A description of the project.**

**(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**

**(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**

**(i) Baseline actual emissions;**

**(ii) Projected actual emissions;**

**(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and**

**(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.**

**(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and**

**(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.**

**Revision 19:** Condition C.23, General Reporting Requirements, has been updated. New language has been added to part (e) for clarity. Also, because of the new language added to condition C.22, three parts have been added to C.23 as (f), (g), and (h). These changes read as:

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years**, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive**.

**(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:**

**(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and/or 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and**

**(2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).**

**(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:**

**(1) The name, address, and telephone number of the major stationary source.**

**(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.**

**(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).**

**(4) Any other information that the Permittee deems fit to include in this report,**

**Reports required in this part shall be submitted to:**

**Indiana Department of Environmental Management**
**Air Compliance Section, Office of Air Quality**
**100 North Senate Avenue**
**Indianapolis, Indiana 46204-2251**

**(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.**

**Revision 20:** On November 29, 2004, AK Steel submitted a name change for MG Industries. MG Industries is now known as "Air Liquide Industrial, U.S.L.P.". As a result, all references to MG Industries in the Part 70 operating permit have been changed accordingly.

**Revision 21:** For clarification, the following change has been made to conditions D.2.2 and D.5.2(b), regarding hazardous air pollutants:

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 19, and Amendment 147-11471-00041, issued April 18, 2002, the emissions of hazardous air pollutants from the entire source shall be less than 10 tons per 365 day period for any individual HAP ~~or~~**and** 25 tons per 365 day period of any combination of HAPs.

**Revision 22:** On August 5, 2005, AK Steel was issued a permit which revised three conditions from the original construction permit, and the draft Part 70 Operating Permit that was on public notice. The changes made as a result of this permit, 147-19502-00041, are shown below.

D.1.2(a) now reads as:

The 110.0 MMBtu per hour annealing furnace section No.1 and the 55.0 MMBtu per hour annealing furnace section No.2 shall each use only natural gas and NOx emissions shall be controlled by ultra low-NOx burners with integral exhaust gas recirculation (or its equivalent). ~~The outlet nitrogen oxide loading shall not exceed 0.040 pounds per MMBtu. The~~ **Pursuant to Significant Source Modification 147-19502-00041, issued August 5, 2005,** nitrogen oxide emissions from the ~~two sections of the annealing~~ furnace**s** shall not exceed ~~4.40 and 2.20 pounds per hour, respectively.~~ **the following limits:**

| Furnace | Stainless Steel Type | lb/MMBtu | lb/hr |
|---|---|---|---|
| **110 MMBtu/hr (Section No.1)** | | | |
| | **400 Cold Roll** | **0.08** | **8.0** |
| | **300 Cold Roll** | **0.087** | **9.6** |
| | **300 Hot Roll** | **0.04** | **4.4** |
| **55 MMBtu/hr (Section No.2)** | | | |
| | **400 Cold Roll** | **0.14** | **7.7** |
| | **300 Cold Roll** | **0.11** | **6.1** |
| | **300 Hot Roll** | **0.04** | **2.2** |

And D.8.2 has been changed to:

**Pursuant to Significant Source Modification 147-19502-00041, issued August 5, 2005:**

(a) The two 76.0 MMBtu pack age boilers (~~now~~ known as the North Boilers) shall use only natural gas and shall be equipped with ultra low NOx burners. The total outlet nitrogen oxide loading **from each individual** ~~the~~ boiler~~s~~ shall not exceed 0.04 pounds per MMBtu. The nitrogen oxide emissions from Stack S03 shall not exceed ~~6.08~~ **3.04** pounds per hour **from each individual boiler**.

(b) ~~Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 31, t~~**T**he two 76.0 MMBtu package boilers (~~now~~ known as the South Boilers) shall use only natural gas and shall be equipped with ultra low NOx burners. The total outlet nitrogen oxide loading **from each individual** ~~the~~ boiler~~s~~ shall not exceed 0.04 pounds per MMBtu. The nitrogen oxide emissions from Stack S20 shall not exceed ~~6.08~~ **3.04** pounds per hour **from each individual boiler**.

# Indiana Department of Environmental Management
# Office of Air Quality

## Technical Support Document (TSD) for a Part 70 Operating Permit

## Source Background and Description

**Source Name:** AK Steel Corporation
**Source Location:** 6500 North U.S. 231, Rockport, Indiana 47635
**County:** Spencer
**SIC Code:** 3312
**Operation Permit No.: T147-11043-00041**
**Permit Reviewer:** Melissa Groch

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from AK Steel Corporation relating to the operation of stationary steel coil finishing plant with ancillary equipment.

### Source Definition

This stationary source consists of three companies; one primary plant, and two on-site contractors. The primary plant is:

AK Steel Corporation (147-00041), a steel coil finishing operation located at 6500 North U.S. 231, Rockport, Indiana, 47635.

The two on-site contractors are:

(a) MG Industries (147-00049), an industrial gas production operation located in the AK Steel plant, at 6500 North US Route 231, Rockport, Indiana 47635; and

(b) Precision Strip, Inc. (147-00051), a slitting operation located in the AK Steel plant, at 6500 North US Route 231, Rockport, Indiana 47635.

These two contractors are considered one source with AK Steel, Rockport Works, due to location, and reliance of at least 50 percent of AK Steel's business. Therefore, the term "source" in the Part 70 documents refers to both contractors and AK Steel as one source.

One document for the Part 70 permit (T 147-11043-00041) has been created which includes AK Steel Rockport Works, MG Industries, and Precision Strip, Inc.

Although there is one Part 70 permit for these companies, each will have its own designated Responsible Official.

IDEM has determined that American Iron Oxide Company (AMROX) is not considered one source with AK Steel based on the review of several criteria. AMROX is not under common control of AK Steel, and each source has different SIC codes. AK Steel provides less than 50% of AMROX's permitted capacity (the second roaster has not yet been built), and in turn does not purchase iron oxide from them. Also, less than 50% percent of the HCL regenerated by AMROX is returned to AK Steel. As a result, these two plants are considered separate sources for the purposes of Part 70 review. Additional information was submitted by AMROX to support this information. Because AMROX is also a major source, they submitted a Part 70 application on October 21, 2002.

### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

AK Steel

(a) A Continuous Anneal and Pickling Line (APL) with a maximum normal capacity of 130 tons per hour consisting of:

(1) one (1) flattener,
(2) one (1) shear,
(3) one (1) laser welder,
(4) one (1) leveller shear,
(5) one (1) alkaline cleaner section exhausting through a wet scrubber system to Stack S06,
(6) one (1) 110.0 million (MM) Btu per hour natural gas-fired annealing furnace section equipped with low-NOx burners with integral exhaust gas recirculation (or equivalent) exhausting to S07A,
(7) one (1) 55.0 MMBtu per hour natural gas-fired annealing furnace section equipped with low-NOx burners with integral exhaust gas recirculation (or equivalent) exhausting to S07B,
(8) one (1) air quench station consisting of 11 sections exhausting through a baghouse to Stack S08,
(9) two (2) water quench sections,
(10) one (1) cooling tower with 1650 gallons per minute recirculating capacity,
(11) one (1) enclosed shot blasting chamber exhausting through a baghouse to S05,
(12) electrolytic pickle and rinse tanks exhausting through a wet scrubber system to S09A,
(13) mixed acids pickle and rinse tanks exhausting through a multi-stage oxidation/reduction and acid neutralization scrubbing system to S09B,
(14) one (1) steam heated strip dryer,
(15) skin pass temper mill exhausting through a baghouse to S09C, and
(16) one (1) tension/leveller and side trimmer.

(b) A Continuous Pickling Line (CPL) with a maximum normal capacity of 476 tons per hour consisting of:

(1) one (1) strip leveller and (1) mechanical scale breaker exhausting through a baghouse to S01,
(2) one (1) laser welder and one (1) tension leveller,
(3) three (3) HCl acid pickle and rinse tanks exhausting through a wet scrubber system to S02,
(4) one (1) steam heated pickle dryer,
(5) one (1) shear/trimmer, and
(6) one (1) electrostatic oiler

(c) A Continuous Cold Mill (CCM) with a maximum normal capacity of 660 tons per hour consisting of:

(1) one (1) strip leveller and one (1) shear,
(2) one (1) laser welder,
(3) five (5) cold reduction mills exhausting through one (1) mist elimination system to S11; and
(4) one (1) cold mill rotary shear and tension reels

(d) One (1) Temper Mill with a maximum capacity of 300 tons per hour exhausting through one (1) oil mist elimination system to S16.

(e) A Continuous Galvanizing Line (CGL) with a maximum normal capacity of 183.6 tons per hour consisting of:

(1) one (1) flattener,
(2) one (1) mash seam welder,
(3) alkaline cleaning system exhausting through a wet scrubber system to Stack S17,
(4) one (1) 4.1 MMBtu/hour natural gas-fired cleaning section dryer,
(5) one (1) 205.7 MMBtu/hr annealing furnace with a continuous emissions monitor and controlled by a selective catalytic reduction (SCR) system exhausting to Stack S18,
(6) one (1) 7.0 MMBtu per hour natural gas-fired back-up galvanneal soak section burner,
(7) one (1) 2.05 MMBtu per hour natural gas-fired preheater for the zinc pot equipment,
(8) one (1) induction zinc premelt pot,
(9) one (1) induction heated zinc coating pot,

(10) one (1) 0.82 MMBtu per hour natural gas-fired edge burner,
(11) one (1) water quench cooling section with a closed loop, recirculating water spray,
(12) one (1) 4.1 MMBtu/hour natural gas-fired dryer,
(13) one (1) skin pass temper mill and one (1) tension leveller,
(14) one (1) chromate application system with one (1) roll coater,
(15) one (1) 6.0 MMBtu/hour natural gas-fired dryer,
(16) one (1) phosphate application system with one (1) roll coater,
(17) one (1) 5.68 MMBtu/hour natural gas-fired dryer,
(18) one (1) electrostatic oiler, and
(19) one (1) rotary shear.

(f) A Roll Repair Shop consisting of:

(1) Two (2) electrolytic chrome dip tanks, identified as 1 east and 1 west constructed in 1998, rated at 36 tons per hour steel rolls each, or 5.5 gallons per hour chromium solution, with both exhausting through a composite mesh pad mist elimination system to Stack S15.

(2) One (1) electrodischarge texturing machine exhausting through a baghouse to the interior of the building.

(g) Ancillary Equipment, as listed is;

(1) Hydrogen batch annealing with fifteen (15) natural gas-fired furnaces with low-NOx burners rated at 6.75 MMBtu per hour exhausting through the roof vent system in building 500;

(2) Natural gas-fired space heaters and air make-up units with each unit limited to no more than 5.2 MMBtu per hour and a combined rating limited to no more than 251 MMBtu per hour;

(3) Two (2) non-contact cooling towers with mist drift eliminators exhausting to the atmosphere;

(4) Storage tanks for HCl, nitric acid, and HF exhausting through a fume scrubber to Stack S04 consisting of:

(A) One (1) hydrofluoric acid tank with a capacity of 20,000 gallons;

(B) One (1) nitric acid tank with a capacity of 20,000 gallons;

(C) Three (3) waste acid tanks, each with a capacity of 40,000 gallons, or 120,000 gallons combined;

(D) Three (3) hydrochloric/ra acid tanks, each with a capacity of 20,000 gallons, or 60,000 gallons combined; and

(E) Two (2) CPL waste acid tanks, each with a capacity of 20,000 gallons, or 40,000 gallons combined.

(5) Miscellaneous storage tanks at the continuous cold mill (CCM) operation not to exceed an overall capacity of 353,000 gallons, consisting of:

(A) Two (2) Morgoil System 2 tanks, No1 and No.2, each with a capacity of 18,500 gallons, or 37,000 gallons combined;

(B) One (1) CCM gear lube tank, with a capacity of 13,500 gallons;

(C) One (1) base oil storage tank, with a capacity of 10,000 gallons;

(D) One (1) direct oil tank, with a capacity of 4,000 gallons;

(E) Two (2) Emulsion tanks, No.1 and No.2, each with a capacity of 88,000 gallons, or 176,000 gallons combined; and

(F) Two (2) Emulsion tanks, No.3 and No.4, each with a capacity of 44,000 gallons, or 88,000 gallons combined;

(6) Miscellaneous storage tanks at the temper mill operation not to exceed an overall capacity of 131,000 gallons, consisting of:

(A) One (1) direct oil application tank, with a capacity of 4,000 gallons;

(B) Three (3) temper mill tanks, TM1-UZ203, LSL-01, 02, and 03, each with a capacity of 10,000 gallons, or 30,000 gallons combined;

(C) One (1) base oil tank, with a capacity of 8,000 gallons;

(D) One (1) solution tank, with a capacity of 3,200 gallons;

(E) One (1) gear lube tank, TM-1-P-2084, with a capacity of 2,100 gallons; and

(F) Two (1) Morgoil tanks, TM-1-P-2000 and 99, each with a capacity of 5,300 gallons, or 10,600 gallons combined.

(7) Miscellaneous oil storage tanks for the continuous galvanizing line (CGL) not to exceed an overall capacity of 16,250 gallons, consisting of:

(A) One (1) tank, GL1-PGOL-TNK-01, with a capacity of 6,000 gallons; and

(B) Three (3) tanks, GL1-PGOL-TNK-02, 03, and 04, each with a capacity of 3,000 gallons, or 9,000 gallons combined.

(8) A miscellaneous oil storage tank for the continuous pickling line (CPL), consisting of one (1) CPL pickling tank, with a capacity of 15,000.

(h) Rolling oils, rust preventative oils, and prelube oils.

(i) Process boilers consisting of:

(1) North Boilers: Two (2) natural gas fired boilers with ultra low-NOx burners, constructed in 1998, each rated at 76.0 MMBtu per hour heat input, exhausting to stack S03.

(2) South Boilers: Two (2) natural gas fired boilers with ultra low-NOx burners, constructed in 1998, each rated at 76.0 MMBtu per hour heat input, exhausting to stack S20.

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(b) VOC and HAP storage containers: Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(c) Activities associated with the treatment of wastewater streams with an oil and grease content of less than or equal to 1% by volume.

(d) Noncontact cooling tower systems with a forced and induced draft cooling tower system not regulated

under a NESHAP.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Paved and unpaved roads and parking lots with public access.

(g) Flue gas conditioning systems and associated chemicals such as the following: sodium sulfate, ammonia, and sulfur trioxide.

(h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(j) Emergency generators: Diesel generators not exceeding 1600 horsepower.

(k) Other emergency equipment: Stationary fire pumps.

(l) Purge double block and bleed valves.

(m) Farm Operations

(n) As defined in 326 IAC 2-7-1(21), the potential emissions of each insignificant activity shall be equal to or less than the following thresholds:

| | |
|---|---|
| Lead (Pb)= 0.6 ton/year or 3.29 lbs/day | Carbon Monoxide (CO)= 25 lbs/day |
| Sulfur Dioxide (SO2)= 5 lbs/hr or 25 lbs/day | Particulate Matter (PM)= 5 lbs/hr or 25 lbs/day |
| Nitrogen Oxides (NOx)= 5 lbs/hr or 25 lbs/day | Volatile Organic Compounds (VOC)= 3 lbs/hr or 15 lbs/day |

(1) The following AK Steel activities, not previously identified, that fall below the above emission thresholds are:

APL Flattener/Shear
APL Tension Leveler
CM Rotary Shear
CGL Flattener
CGL Zinc Pot
CGL Chromating Section Application with Roll Coater (formerly stack S19)
CGL Phosphate Application with Roll Coater
RRS Roll Grinding Machines
RRS EDT Machines (formerly stack 15B)

(2) MG Industries and Precision Strip, Inc., are each considered insignificant activities, as defined in 326 IAC 2-7-1(21), because the potential emissions of each separately are equal to or less than the thresholds listed above. Their process equipment consists of:

<u>MG Industries</u>

(A) One (1) hydrogen generator using natural gas as feedstock, maximum input capacity of 6.24 million Btus per hour;

(B) One (1) cooling tower, maximum capacity of 3,700 gallons per minute; and

(C) One (1) natural gas fired emergency generator, maximum capacity of 80 KVA, with natural gas consumption rate of 1,138 cuft per hour.

<u>Precision Strip, Incorporated</u>

(A) One (1) backup electrostatic oiler, with a maximum capacity of 123.2 pounds of oil per hour, with the operation of the oiler not to exceed 15% of Precision Strip's total operation.

(B) Mechanical cold rolled steel coil slitting operation, rated at 176,000 pounds per hour coiled steel, using various oils, with no emissions.

**Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

AK Steel

(a) Amendment 147-11471-00041, issued on April 18, 2002;

(b) Amendment 147-10571-00041, issued March 4, 1999;

(c) Amendment 147-9818-00041, issued June 24, 1998;

(d) Amendment 147-9557-00041, issued May 6, 1998;

(e) Construction Permit 147-6713-00041, issued February 13, 1997.

MG Industries

Registration 147-9539-00049, issued on June 2, 1998.

Precision Strip, Incorporated

(a) Amendment 147-11240-00051, issued September 28, 1999; and

(b) Amendment 147-9787-00050, issued October 2, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit except the following conditions from permits issued to AK Steel:

(1) Construction Permit 147-6713-00041, issued February 13, 1997, and Amendment 147-11471, issued April 18, 2002:

Operation Condition 12: That upon startup, the electrolytic chrome dip tank mist elimination system (S15) shall be operated at all times when its associated facility is in operation as identified below:

(a) The permittee shall record the pressure drop of the mist eliminator at least once per day. The Preventive Maintenance Plan for the mist eliminator shall contain troubleshooting contingency and corrective actions for when the pressure drop readings are outside of the normal range for any one reading.

(b) The instruments used for determining the pressure drop shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

(c) The gauge employed to take the pressure drop across the mist eliminator or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm$ 2% of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

(d) An inspection shall be performed each calendar quarter of the mist eliminator. Defective mist eliminator components shall be replaced. A record shall be kept of the results of the inspection and the number of mist eliminator components replaced.

(e) In the event that a mist eliminator's failure has been observed:

(1) The affected unit will be shut down immediately until the failed unit has been repaired or replaced.

(2) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

(f) The permittee shall submit vendor specifications for each mist eliminator and shall include operating parameters for pressure drop. The permittee may use another method approved by the Commissioner to establish the operating parameters in lieu of vendor specifications. This information shall be submitted to the:

Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

at least 35 days prior to performance testing. Once the operating parameters are established, they shall become part of the Preventive Maintenance Plan.

(g) These records shall be kept for at least the past 36 month period and made available upon request to the Office of Air Management (OAQ).

Reason not incorporated: The mist elimination system for the Electrolytic Chrome Dip Tanks is subject to the provisions of the Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N] which has specific requirements for monitoring, record keeping, and reporting that are more stringent than the previous requirements listed above.

Operation Condition 13: That visible emission notations of all exhaust to the atmosphere from Stack S15 from the mist eliminator system shall be performed once per working shift (during daylight hours). A trained employee will record whether emissions are normal or abnormal.

(a) For processes operated continuously, “normal” visible emission notations mean those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting start up or shut down time.

(b) In the case of batch or discontinuous operation, notations shall be taken during that part of the operation specified in the facility’s specific condition prescribing visible emissions.

(c) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal and abnormal visible emissions for that specific process.

(d) The Preventive Maintenance Plan for this facility shall contain troubleshooting contingencies and corrective actions for when an abnormal emission is observed.

(e) These records shall be kept for at least a 12 month period and made available upon request to the Office of Air Quality (OAQ).

Reason not incorporated: The mist elimination system for the Electrolytic Chrome Dip Tanks is subject to the provisions of the Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N] which has specific requirements for monitoring, record keeping, and reporting, that are deemed sufficient for the purposes of the Part 70 program.

Operation Condition 14: A certified visible emissions reader shall conduct observations in accordance with 40 CFR 60, Appendix A, Method 9, once per working shift (during daylight hours) for 12 minutes during each observation period for the following stacks:

Stack S11 from the continuous cold mill mist eliminator system, and
Stack S16 from the temper mill mist eliminator system.

Reason not incorporated: On April 20, 2002, the source submitted a letter regarding the 2000 and 2001 data for these units. These units began operating in the year 1998 and 1999, respectively. They requested that this requirement be removed from these units based on not having any readings above 5% opacity for these two units over a two year period. The IDEM Office of Air Quality has agreed that this requirement be lessened to Visible Emission Notations once per shift for these units. Therefore, a certified visible emissions reader will no longer be required.

Operation Condition 21: The particulate matter generated from the APL stretch leveller shall be controlled by a baghouse. The outlet grain loading from the baghouse shall not exceed 0.010 grains per dry standard cubic feet (grains per dscf). The particulate matter emissions shall not exceed 1.89 pounds per hour.

Reason not incorporated: The APL Stretch Leveller was never installed.

Operation Condition 30: The three 76.0 MMBtu package boilers located in Boiler House No.1 shall use only natural gas and shall be equipped with ultra low NOx burners. The total outlet nitrogen oxide loading from the boilers shall not exceed 0.04 pounds per MMBtu. The nitrogen oxide emissions from Stack S03 shall not exceed 9.12 pounds per hour.

Reason not incorporated: The source only constructed two of the three boilers that were to share Stack S03. The NOx emissions from Stack S03 will now be limited to 6.08 pounds per hour, the same limit as the two boilers that share Stack S20, listed in operation condition 31, of Construction Permit 147-6713-00041, issued February 13, 1997.

In addition, the source changed the description of the boilers to designate each set as “North Boilers” and “South Boilers”, instead of Boiler Houses No.1 and No.2, respectively.

Operation Condition 34: That pursuant to 326 IAC 2-2-3 (Best Available Control Technology), the mist from the two (2) non-contact cooling towers shall be controlled by drift eliminators and exhausted to the atmosphere. The outlet grain loading from the drift eliminators shall not exceed 0.005 percent drift.

Reason not incorporated: The second sentence above has been clarified in this permit. It is now written as; “The drift losses from each of the cooling towers shall not exceed 0.005% of cooling water.”

(2) Pursuant to Registration 147-9536-00049, issued June 2, 1998, any change or modification which may increase the potential nitrogen oxides emissions to 25 tons per year or more from this process must be approved by the Office of Air Quality (OAQ) before such a change may occur.

Reason not incorporated: The threshold is 10 tons per year.

**Enforcement Issue**

AK Steel

(a) IDEM is aware that on January 19, 1999, the Chromating Section on the Continuous Galvanizing Line was not in compliance with the emission limitation listed in Construction Permit 147-6713-00041, issued February 13, 1997, operation conditions 8(b) and 24(i).

The source has resolved this by changing the application method from spray to roll coat.

This violation is documented under Enforcement Case 1999-3573-A.

(b) IDEM is aware that on January 19 and on May 25, 1999, the Alkaline Cleaner (S17) on the Continuous Galvanizing Line was not in compliance with the emission limitation listed in Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 24(a).

Pursuant to Construction Permit Amendment 147-11471-00041, issued April 18, 2002, condition 24(a), total particulate matter (including condensible PM10) shall not exceed 0.0065 grains per dscf and 0.382 pounds per hour. In the initial CP 147-6713-00041, issued February 13, 1997, the BACT limit on this scrubber was for filterable particulate matter. Condensible PM10 was taken into consideration under

amendment 11471 and a limit was set for total particulate matter as a result.

This violation is documented under Enforcement Case 1999-3573-A.

(c) IDEM is aware that on May 24, 1999, the north boiler No.1 (S03) was not in compliance with the NOx emission limitation listed in Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 30.

The source has tested in compliance with their NOx limit for this unit on November 16, 1999.

This violation is documented under Enforcement Case 2000-3636-A.

(d) IDEM is aware that on November 17, 1999, and on November 7, 2000, the electrolytic HCL pickling and rinse tanks (S09A) on the Continuous Anneal and Pickling Line were not in compliance with the emission limitation listed in Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 22(b).

Pursuant to Construction Permit Amendment 147-11471-00041, issued April 18, 2002, condition 24(b), total particulate matter (including condensible PM10) shall not exceed 0.0091 grains per dscf and 0.61 pounds per hour. In the initial CP 147-6713-00041, issued February 13, 1997, the BACT limit on this scrubber was for filterable particulate matter. Condensible PM10 was taken into consideration under amendment 11471 and a limit was set for total particulate matter as a result.

This violation is documented under Enforcement Case 2000-9415-A.

(e) IDEM is aware that on November 17, 1999, and on November 7, 2000, the mixed acid pickle and rinse tanks (S09B) on the Continuous Anneal and Pickling Line were not in compliance with the emission limitation listed in Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 30.

Pursuant to Construction Permit Amendment 147-11471-00041, issued April 18, 2002, condition 24(b), total particulate matter (including condensible PM10) shall not exceed 0.0091 grains per dscf and 0.61 pounds per hour. In the initial CP 147-6713-00041, issued February 13, 1997, the BACT limit on this scrubber was for filterable particulate matter. Condensible PM10 was taken into consideration under amendment 11471 and a limit was set for total particulate matter as a result.

This violation is documented under Enforcement Case 2000-9415-A.

(f) IDEM is aware that on November 8, 2000, the Scale Breaker Baghouse (S01) on the Continuous Pickling Line was not in compliance with the emission limitation listed in Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 22.

This violation is documented under Enforcement Case 2000-9415-A.

(g) IDEM is aware that on November 8, 2000, the HCL Pickle and Rinse Tanks (S02) on the Continuous Pickling Line were not in compliance with the emission limitation listed in Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 22.

This violation is documented under Enforcement Case 2000-9415-A.

(h) IDEM is aware that on November 15, 1999, and on February 29, 2000, the Annealing Line Furnace No.1 and No.2 (S07A, S07B), respectively, were not in compliance with the emission limitation listed in Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 21.

The source has pointed out a mathematical error which when corrected showed the furnaces had tested in compliance. Therefore, this issue was withdrawn from Enforcement Case 2000-9417-A because the source was deemed in compliance after correcting the mathematical error.

An Agreed Order was issued on December 18, 2002, which required the Respondent (AK Steel) to resolve the violations listed above (a through g) by paying a civil penalty as stipulated in the order, and performing a

Supplemental Environmental Project to completion.

Currently, there are no enforcement actions pending for MG Industries or Precision Strip, Inc., and no further pending actions for AK Steel.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on June 8, 1999.

A notice of completeness letter was mailed to the source on August 2, 1999.

**Emission Calculations**

It was not necessary to perform additional calculations for this review of the Part 70 permit application.

**Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "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 type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) | | |
|---|---|---|---|
| | AK Steel | MG Industries | Precision Strip, Inc. |
| PM | greater than 100 | less than 5 lbs/hour or 25 lbs/day | less than 5 lbs/hour or 25 lbs/day |
| PM-10 | greater than 100 | less than 5 lbs/hour or 25 lbs/day | less than 5 lbs/hour or 25 lbs/day |
| $SO_2$ | less than 100 | less than 5 lbs/hour or 25 lbs/day | - |
| VOC | greater than 100 | less than 3 lbs/hour or 15 lbs/day | less than 3 lbs/hour or 15 lbs/day |
| CO | greater than 100 | less than 25 lbs/day | - |
| $NO_x$ | greater than 100 | less than 5 lbs/hour or 25 lbs/day | - |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| AK Steel HAP's * | Potential To Emit (tons/year) |
|---|---|
| Hydrochloric acid | 1.33 |
| Hydrofluoric acid | 2.11 |
| Chromium Compounds | 0.16 |
| TOTAL | single and combination, less than 10 |

* Based on CP147-6713-00041 TSD information

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10, VOC, CO, and NOx are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2 (Prevention of Significant Deterioration or PSD), the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data. This data includes MG Industries as required by Registration 147-9539-00049, issued on June 2, 1998.

| Pollutant | Actual Emissions (tons/year) |
|---|---|
| PM | 39.0 |
| PM-10 | 39.0 |
| $SO_2$ | 1.0 |
| VOC | 17.0 |
| CO | 108.0 |
| $NO_x$ | 110.0 |
| HAP (specify) | none submitted |

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

| | Potential to Emit (tons/year) | | | | | | |
|---|---|---|---|---|---|---|---|
| Facility | PM | PM-10 | $SO_2$ | VOC | CO | $NO_X$ | HAPs |
| AK Steel* | 252.0 | 252.0 | 3.03 | 63.0 | 208.0 | 346.0 | less than 10 single, less than 25 combined |
| Precision Strip | 2.76 | 2.76 | - | 2.6 lb/VOC per gallon, and less than 3 lbs/hour, or 15 lbs/day ** | - | - | - |
| MG Industries | 4.42 | 4.42 | 0.01 | 0.73 | 4.24 | 17.0 | - |
| Total Emissions | 270.26 | 274.18 | 3.20 | 63.73** | 220.7 | 383.3 | less than 10 single, less than 25 combined |

* See BACT for specific units

** The use of Precision Strip's back-up electrostatic oiler does not add VOC emissions to the Total VOC, since it operates only when AK Steel's oiler is off line.

This source is a major stationary source under 326 IAC 2-2 (Prevention of Significant Deterioration) because at least one regulated attainment pollutant is emitted at a rate of 100 tons per year (because they are 1 of 28) or greater.

**County Attainment Status**

The source is located in Spencer County.

| Pollutant | Status |
|---|---|
| PM-10 | attainment |
| $SO_2$ | attainment |
| $NO_2$ | attainment |
| Ozone | attainment |
| CO | attainment |
| Lead | attainment |

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating rule applicability relating to the ozone standards. Spencer County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Spencer County has been classified as attainment or unclassifiable for total suspended particulate, sulfur dioxide, carbon monoxide, and nitrogen oxides. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Federal Rule Applicability**

Section 112 (j) MACT Hammer

The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source is not a major source of hazardous air pollutant (HAP) emissions (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP, or 25 tons per year or greater of a combination of HAPs) and the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.

40 CFR Part 60, Subpart Dc (Standards for Small Industrial-Commercial-Institutional Steam Generating Units)

This New Source Performance Standard (NSPS) is applicable to steam generating units for which construction commenced after June 9, 1989, and have a heat input capacity between 10 MMBtu per hour and 100 MMBtu per hour. The four (4) 76.0 MMBTU per hour natural gas-fired boilers are therefore subject to this rule, but the emissions standards of this NSPS does not apply to natural gas-fired units. Therefore, the natural gas-fired boilers are subject to NSPS 60.48c(g) which requires the source to record and maintain records of fuel usage.

40 CFR Part 60, Subpart Kb (Standards of Performance for Storage Vessels for Volatile Organic Liquids)

The tanks storing petroleum products are subject to the New Source Performance Standard 40 CFR Part 60.110b, Subpart Kb. According to this rule, the owner or operator of the storage vessels shall keep readily accessible records showing the dimensions and capacity of each storage vessel.

40 CFR Part 63, Subpart A (National Emissions Standards for Hazardous Air Pollutants for Source Categories: General Provisions)

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the chrome dip tanks located in the roll repair shop except when otherwise specified in 40 CFR Part 63, Subpart N. The Permittee shall comply with the requirements of this condition on and after the compliance date for the tanks.

40 CFR Part 63, Subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks)

The chrome dip tanks located in the roll repair shop are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1).

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart N.

The chromium electroplating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1). Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-1-1, the chromium electroplating operations are subject to the following conditions:

(1) The surface tension of the chromium electroplating bath contained with the tanks shall not exceed forty-five (45) dynes per centimeter at any time during the operation of the tanks if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance.

(2) Each time that surface tension monitoring exceeds forty-five (45) dynes per centimeter, the frequency of monitoring must revert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs.

(3) An alternative emission limit of 0.01 milligram per day standard cubic meter (mg/dscm) will be applicable if the chromium electroplating bath does not meet the limit above.

(4) A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. This report shall be completed annually, retained on site, and made available to IDEM upon request. If there are significant exceedances of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Branch, Office of Air Quality
Chromium Electroplating
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206

(5) The chromium electroplating operations shall be subject to the record keeping and reporting requirement as indicated in the chromium electroplating NESHAP.

40 CFR Part 63, Subpart CCC (National Emission Standards for Hazardous Air Pollutants for Steel Pickling- HCl Process Facilities and Hydrochloric Acid Regeneration Plants)
The pickling operations are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart CCC, and 326 IAC 20-1-1) because AK Steel is not a major source of hazardous air pollutants.

MG Industries

(a) There are no New Source Performance Standards (326 IAC 12) or 40 CFR Part 60 standards applicable to MG Industries.

(b) 326 IAC 14 and 40 CFR 61 (National Emission Standard For Hazardous Air Pollutants)
MG Industries is not subject to Emission Standard For Hazardous Air Pollutants, 326 IAC 14 and 40 CFR Part 61, as no hazardous air pollutants covered under these rules are emitted from this source.

(c) 326 IAC 20 and 40 CFR 63 Subpart Q (National Emission Standard For Hazardous Air Pollutants for Industrial Process Cooling Towers) are not applicable to the cooling tower, because no chromium-based water treatment chemicals will be used in this cooling tower.

Precision Strip, Inc.

(a) There are no New Source Performance Standards (326 IAC 12) or 40 CFR Part 60 standards applicable to this source. NSPS, Subpart TT does not apply to Precision Strip, Inc., because the equipment is not capable of applying paint and the oils applied do not require drying or curing by oven, or quenching for cool off.

(b) There are no Emission Standards For Hazardous Air Pollutants (326 IAC 14 and 40 CFR 61), as no hazardous air pollutants covered under these rules are emitted from Precision Strip, Inc.

**State Rule Applicability - Entire Source**

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source has submitted Preventive Maintenance Plans (PMP) on June 8, 1999, as a part of their Title V operating permit application.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than 100 tons per year of at least one pollutant regulated under this rule. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and must contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 12 (New Source Performance Standards)

AK Steel is subject to the New Source Performance Standard 40 CFR 60, Subpart Dc and Subpart Kb. The Indiana Air Pollution Control Board incorporates by reference 40 CFR 60 into 326 IAC 12.

326 IAC 20 (Hazardous Air Pollutants)

AK Steel is subject the NESHAP 40 CFR 63, Subpart N. The Indiana Air Pollution Control Board incorporates by reference 40 CFR 63 into 326 IAC 20.

**State Rule Applicability - Individual Facilities**

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1 (Applicability), this rule shall not apply if a particulate matter limitation established in 326 IAC 2-2-3, concerning prevention of significant deterioration (PSD) best available control technology (BACT) determinations contained in a permit is more stringent than the particulate limitation established in this rule.

Construction Permit 147-6713-00041, issued February 13, 1997, and subsequent amendments to this document, the most recent being Amendment 147-11471-00041, issued April 18, 2002, contain particulate matter limitations based on BACT determinations as required by 326 IAC 2-2-3.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is a major stationary source for PSD because at least one regulated attainment pollutant is emitted at a rate of 100 tons per year or greater. The source has received construction approval under PSD through Construction Permit 147-6713-00041, issued February 13, 1997, and subsequent amendments to this document, the most recent being Amendment 147-11471-00041, issued April 18, 2002. The applicable BACT requirements below are incorporated from these permits.

<u>AK Steel</u>

Continuous Annealing and Pickling Line (APL):

Alkaline Cleaner Section PM BACT:

The alkaline cleaner shall be enclosed and maintained under negative pressure. The filterable particulate matter ($PM/PM_{10}$) generated from this process shall be controlled by a wet scrubber system. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0044 grains per dscf and 0.377 pounds per hour.

Annealing Furnace BACT:

For PM, CO, and VOC, BACT shall be the use of natural gas.

For NOx BACT, the 110.0 MMBtu per hour annealing furnace section No.1 and the 55.0 MMBtu per hour annealing furnace section No.2 shall each use only natural gas and NOx emissions shall be controlled by use of ultra low-NOx burners with integral exhaust gas recirculation (or its equivalent). The outlet nitrogen oxide loading shall not exceed 0.040 pounds per MMBtu. The nitrogen oxide emissions

from the two sections of the annealing furnace shall not exceed 4.40 and 2.20 pounds per hour, respectively.

The Permittee shall employ an operational practice called “smoke and anneal” for certain grades of stainless steel in the 110.0 MMBtu per hour annealing furnace section No.1 and the 55.0 MMBtu per hour annealing furnace section No.2. This operational practice shall be limited to no more than 48 days or 1152 hours per 12 consecutive month period. The outlet nitrogen oxide loading shall not exceed 0.080 pounds per MMBtu during this operation. The combined nitrogen oxide emissions from the two sections of the annealing furnace shall not exceed 13.2 pounds per hour and 7.60 tons per year for this operation.

Air Quench Station PM BACT:

Filterable particulate matter (PM/PM10) generated from the air quench station shall be controlled by a baghouse (S08). Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.005 grains per dscf and 1.41 pounds per hour.

Shot Blaster Chamber PM BACT:

The shot blaster chamber shall be enclosed and maintained under negative pressure. The particulate matter generated from the operation shall be exhausted to a baghouse (S05) with an outlet grain loading not to exceed 0.000009 grains per dscf. The particulate matter emissions shall not exceed 0.006 pounds per hour.

Electrolytic Pickling Section (pickle and rinse tanks) PM BACT:

Filterable particulate emissions (PM/PM10) generated from the electrolytic pickling section shall be controlled by a wet scrubber system (S09A). The outlet grain loading from the scrubber for filterable particulate matter shall not exceed 0.0022 grains per dscf and 0.349 pounds per hour. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0093 grains per dscf and 0.77 pounds per hour.

Mixed Acid Pickle and Rinse Tanks BACT:

For PM BACT, the mixed acid pickle and rinse tanks shall be enclosed and maintained under negative pressure. The particulate matter generated from this process shall be controlled by a wet scrubber system (S09B). The outlet grain loading for filterable particulate matter shall not exceed 0.003 grains per dscf and 0.153 pounds per hour. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0060 grains per dscf and 0.28 pounds per hour.

For NOx BACT, the mixed acid pickle and rinse tanks shall be enclosed and maintained under negative pressure. The nitrogen oxide generated from this process shall be controlled by a wet scrubber system (S09B). The outlet nitrogen oxide loading shall not exceed 175 ppmvd and the nitrogen oxide emissions shall not exceed 9.66 pounds per hour.

Strip Dryer PM BACT:

The strip dryer shall only use steam heat.

Skin Pass Temper Mill PM BACT:

Filterable particulate matter (PM/PM10) generated from the skin pass temper mill shall be controlled by a baghouse (S09C). Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0066 grains per dscf and 0.459 pounds per hour.

Continuous Pickling Line (CPL):

Strip Leveller and Mechanical Scale Breaker PM BACT:

Filterable particulate matter (PM/PM10) generated from the strip leveller and mechanical scale breaker shall be controlled by a baghouse. The outlet grain loading of the baghouse for filterable particulate matter shall not exceed 0.0044 grains per dscf and 1.52 pounds per hour. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0076 grains per dscf and 3.69 pounds per hour.

HCL Acid Pickle and Rinse Tanks PM BACT:

The HCl pickling baths and rinse tanks shall be enclosed and maintained under negative pressure. The

filterable particulate matter (PM/PM10 HCl acid mist) generated from this process shall be controlled by a wet scrubber system. The outlet grain loading from the scrubber for filterable particulate matter shall not exceed 0.0020 grains per dscf and 0.206 pounds per hour. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0091 grains per dscf and 0.61 pounds per hour.

Pickle Dryer PM BACT

The pickling line dryer shall only use steam heat.

CPL Electrostatic Oiler PM BACT:

The rust Preventive oils shall be applied to the metal strips electrostatically.

Continuous Cold Mill (CCM) and Temper Mill:

PM BACT:

The five-strand cold reduction mill shall be enclosed and maintained under negative pressure. The filterable particulate matter (PM/PM10) generated from this process shall be controlled by a mist elimination system. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0087 grains per dscf and 16.1 pounds per hour.

The filterable particulate matter (PM/PM10) generated from the temper mill shall be controlled by a mist eliminator. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.010 grains per dscf and 5.71 pounds per hour.

CCM and Temper Mill Opacity BACT:

Visible emissions from stacks S11 and S16 shall not exceed an average of five (5) percent opacity in 24 consecutive readings.

Continuous Galvanizing Line (CGL):

Alkaline Cleaning Baths and Rinse Tanks PM BACT:

The alkaline cleaning baths and rinse tanks shall be enclosed and maintained under negative pressure, and the filterable particulate matter (PM/PM10) generated from the alkaline cleaning baths and rinse tanks shall be controlled by a wet scrubber system (S17). The outlet grain loading from the scrubber for filterable particulate matter shall not exceed 0.0022 grains per dscf and 0.125 pounds per hour. Particulate matter (where PM10 includes both filterable and condensible portions) shall not exceed 0.0065 grains per dscf and 0.382 pounds per hour.

Annealing Furnace BACT:

For NOx BACT, the 205.7 MMBtu/hr annealing and induction heating galvannealing furnace shall be controlled by a selective catalytic reduction control (SCR), and the outlet nitrogen oxide loading from the annealing and induction heating galvannealing furnace shall not exceed 0.06 pounds per MMBtu. The nitrogen oxide emissions shall not exceed 12.3 pounds per hour.

For PM, CO, and VOC, BACT is the use of natural gas.

The Phosphate Application and Roll Coaters BACT:

The 5.68 MMBtu per hour phosphate application with roll coater's dryer shall only use natural gas.

Chromating Application PM BACT:

BACT consists of using a wet scrubber system. The outlet grain loading from the scrubber shall not exceed 0.0009 grains per dscf.

The 6.0 MMBtu per hour chromate application system dryer shall only use natural gas.

CGL Electrostatic Oiler PM and VOC BACT:

BACT consists of the electrostatic application of the oils to lower the particulate matter emissions. The VOC content of the rust preventative oils shall be limited to 3.3 pounds VOC per gallon.

The rust Preventive oils shall be applied to the metal strips electrostatically (CPL electrostatic oiler).

Continuous Galvanizing Line Processes BACT:

The 4.10 MMBtu per hour cleaning section dryer shall only use natural gas.

The 7.0 MMBtu per hour galvanized soak section backup burner shall only use natural gas.

The 2.05 MMBtu per hour preheater for the zinc pot equipment shall only use natural gas.

The induction zinc premelt pot and induction zinc coating pot shall be heated by electricity.

The 0.82 MMBtu per hour edge burners shall only use natural gas.

The 4.1 MMBtu per hour galvanizing line dryer shall only use natural gas.

Roll Repair Shop

Electrolytic Chrome Dip Tanks PM BACT:

The particulate matter generated, measured as chromium, from the electrolytic chrome dip tanks located in the roll repair shop shall be controlled by a mesh pad mist elimination system. The outlet grain loading shall not exceed $6.6 \times 10^{-6}$ grains/dscf.

Electrodischarge Texturing Machine PM BACT:

The particulate matter generated from the electrodischarge texturing machine located in the roll repair shop shall be controlled by a baghouse. The outlet grain loading shall not exceed 0.002 grains per dscf. The particulate matter emissions from the baghouse exhaust shall not exceed 0.012 pounds per hour.

Ancillary Equipment

Hydrogen Batch Annealing Furnaces BACT:

BACT consists of the use of low-NOx burners with an outlet NOx loading of no more than 0.1 pounds per MMBtu.

PM, CO, and VOC BACT is the use of natural gas.

Space Heaters and Air Make-up Units:

Pursuant to 326 IAC 2-1.1 (State Construction and Operating Permit: Construction Permit), the space heaters and air make-up units shall be limited as follows:

(a) each unit shall burn only natural gas,

(b) each unit may vary in size up to a maximum of 5.2 MMBtu per hour and shall not exceed a total combined capacity of 251 MMBtu per hour, and

(c) space heater operations utilizing natural gas shall be restricted to the months of October through April.

Non-Contact Cooling Towers PM BACT:

BACT consists of controlling PM with a drift eliminator. The drift losses from each of the cooling towers shall not exceed 0.005% of cooling water.

CPL HCL, Nitric Acid, and HF Storage Tanks PM BACT:

BACT consists of the acid storage (hydrochloric, hydrofluoric and nitric), waste acid and HF storage tanks equipped with a fume scrubber system to control the vapor loss. The outlet grain loading from the scrubber shall not exceed 10 ppmvd.

Rolling Oils, Rust Preventative Oils, and Prelube Oils:

For VOC BACT;

The VOC content of any rolling oil employed shall not exceed 6.9 pounds of VOC per gallon of oil, excluding water and exempt solvents.

The VOC content of any rust Preventive oil employed shall not exceed 3.3 pounds of VOC per gallon of oil, excluding water and exempt solvents.

The VOC content of any prelube oil employed shall not exceed 0.8 pounds of VOC per gallon of oil, excluding water and exempt solvents.

The oils used at the facility shall contain no hazardous air pollutants (HAPs) as defined in 326 IAC 14-1-2 and 40 CFR 61.02 and 61.03.

326 IAC 8-2-4 (Coil Coating Operations)

Pursuant to 326 IAC 8-2-4 (Coil Coating Operations) no owner or operator of a coil coating line may cause, allow, or discharge into the atmosphere of any volatile organic compounds in excess of 0.31 kilograms per liter of coating (2.6 pounds per gallon) excluding water.

The oils used in the electrostatic oilers (CPL and CGL) shall also comply with the requirements of 326 IAC 8-2-4 (Coil Coating Operations). Since the VOC content of the oil used is less than 2.6 pounds per gallon excluding water, compliance with this rule is achieved.

Boilers

North and South Boiler BACT:

NOx BACT;

Pursuant to 326 IAC 2-2-3 (Best Available Control Technology), the two (2) 76.0 MMBtu per hour package boilers located in Boiler House No.1 (North Boilers) shall use only natural gas and shall be equipped with ultra low NOx burners. The total outlet nitrogen oxide loading from the boilers shall not exceed 0.04 pounds per MMBtu. The nitrogen oxide emissions from Stack S03 shall not exceed 6.08 pounds per hour.

Pursuant to 326 IAC 2-2-3 (Best Available Control Technology), the two (2) 76.0 MMBtu per hour package boilers located in Boiler House No.2 (South Boilers) shall use only natural gas and shall be equipped with ultra low NOx burners. The outlet nitrogen oxide loading from the boiler shall not exceed 0.04 pounds per MMBtu. The nitrogen oxide emissions from Stack S20 shall not exceed 6.08 pounds per hour.

PM, CO, and VOC BACT;

Pursuant to the Technical Support Document for Construction Permit 147-6713-00041, issued February 13, 1997, and 326 IAC 2-2-3 (Best Available Control Technology), the North and South boilers shall only combust natural gas as BACT for PM, CO, and VOC.

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(d)), particulate emissions from all facilities used for indirect heating purposes which were constructed after September 21, 1983, shall not exceed 0.25 pounds of particulate matter per million British thermal units heat input as established by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt= Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q= Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr).

For the facilities exhausting to Stacks S03 and S20, Q equals 304 MMBtu per hour heat input.

Maximum Heat Input: 76 MMBtu/hr * 4 boilers = 304 MMBtu/hr
Potential PM Emissions: 1.9 lbs/MMCF * 2663 MMCF/yr = 5059.7 lbs/yr, or 2.52 t/yr, or 0.58 lbs/hr
Allowable PM Emissions: $1.09/Q^{0.26} = 1.09/304^{0.26} = 0.25$ lbs/MMBtu
0.25 lbs/MMBtu * 304 MMBtu/hr * [8760 hr/yr ÷ 2000lb/t]= 332.9 t/yr
332.9 t/yr = 76 lb/hr

Since the calculated potential PM emissions (0.58 lb/hr) are less than the calculated allowable emissions (76 lb/hr), the boilers show compliance with 326 IAC 6-2-4.

MG Industries

326 IAC 7-1.1-1 (Sulfur dioxide emission Limitations)

The hydrogen gas generator, and the emergency generator, both fired by natural gas, are not subject to 326 IAC 7-1.1-1 (Sulfur dioxide emission Limitations), because these facilities do not have the potential to emit twenty-five (25) tons of sulfur dioxide per year or have actual emissions of ten (10) pounds of sulfur dioxide per hour each.

326 IAC 8-1-6 (General provisions relating to VOC rules- general reduction requirements for new facilities)

The hydrogen gas generator, and the emergency generator are not subject to this rule, because the hydrogen gas generator, and the emergency generator do not have the potential emissions of twenty-five (25) tons of VOC per year each, and no other article 8 rules apply to these facilities.

326 IAC 9-1-1 (Carbon Monoxide emission Limits)

The hydrogen gas generator, and the emergency generator are not subject to this rule, because these facilities are not one of the facilities covered by this rule.

326 IAC 10-1-1 (Nitrogen Oxides Rules)

The hydrogen gas generator, and the emergency generator are not located in Clark and Floyd Counties, therefore, this rule does not apply to these facilities.

Nitrogen Oxides (NOx)

Pursuant to Registration 147-9536-00049, issued June 2, 1998, any change or modification which may increase the potential nitrogen oxides emissions to 25 tons per year or more from this process must be approved by the Office of Air Quality (OAQ) before such a change may occur.

Precision Strip, Inc.

326 IAC 2-2-3 (Best Available Control Technology)

Pursuant to Construction Permit 147-6713-00041 for AK Steel, issued February 13, 1997, operation condition 20, and 326 IAC 2-2-3 (Best Available Control Technology), the volatile organic compound (VOC) emissions of the various oils shall contain no hazardous air pollutants (HAPs) as defined in 326 IAC 14-1-2 and 40 CFR 61.02 and 61.03.

The oil is applied as a rust inhibitor to protect the final product. Therefore, the oil must have a low volatility to ensure that it will last and protect the product as required. The VOC content of the rust preventative oils shall be limited to 3.3 pounds VOC per gallon.

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes: Applicability)

Pursuant to 326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes: Applicability), part (c)(1), this rule shall not apply if a particulate matter limitation established in 326 IAC 2-2-3, concerning prevention of significant deterioration (PSD) best available control technology (BACT) determinations contained in a permit, is more stringent than the particulate limitation established in this rule.

Pursuant to Amendment 147-9787-00050, issued October 2, 1998, Precision Strip's electrostatic oiler is to be utilized only as the back-up for AK Steel's electrostatic oiler. As a result, it is subject to the same BACT requirements as the AK Steel electrostatic oiler; the electrostatic application of the oils to lower the particulate matter emissions.

326 IAC 8-2-4 (Coil Coating Operations)

Pursuant to 326 IAC 8-2-4 (Coil Coating Operations) no owner or operator of a coil coating line may cause, allow, or discharge into the atmosphere of any volatile organic compounds in excess of 0.31 kilograms per liter of coating (2.6 pounds per gallon) excluding water.

Precision Strip shows compliance by using oils that have VOC content compliant with the limit above. The worst case oil, Metlub Oil PL-7105A, has a content of 0.5 pounds per gallon of VOC which complies with this limit.

Volatile Organic Compounds

Pursuant to Amendment 147-9787-00050, issued October 2, 1998, the volatile organic compounds content of any rust prohibitive oil employed shall not exceed 3.3 pounds of VOC per gallon of oil, excluding water and exempt solvents.

Precision Strip shows compliance by using oils that have VOC content compliant with the limit above. The worst case oil, Metlub Oil PL-7105A, has a content of 0.5 pounds per gallon of VOC which complies with this limit.

Usage Limit

Pursuant to Amendment 147-9787-00050, issued October 2, 1998, the electrostatic oiler shall only be operated as a back-up unit in the event that any of AK Steel's electrostatic oilers, which were properly permitted under CP 147-6713-00041, breaks down or if steel coils produced by AK Steel need to be re-oiled after they have been slit per customer request. This electrostatic oiling shall not exceed 15 percent of Precision Strip's total operation.

Precision Strip, Inc., shall keep production records for the back-up electrostatic oiler on site and available at all times to show compliance.

**Testing Requirements**

During the period between 30 and 36 months after the most recent stack test or issuance of this Part 70 permit, which ever comes first, in order to demonstrate compliance with the PM and PM10 BACT limits, the Permittee shall perform PM and PM-10 testing for S01, S02, S06, S08, S09A, S09B, S09C, S11, S16, and S17 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

As required prior to the issuance of the Part 70 operation permit, a performance test demonstrating initial compliance for the electrolytic chrome dip tanks (1 east and 1 west) was performed on January 20, 1999.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

<u>AK Steel</u>

(a) The baghouses (S01, S05, S08, S09C), scrubbers (S02, S04, S06, S09A, S09B, S17), and mist eliminators (S11, S16), have applicable compliance monitoring conditions as specified below:

(1) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 13, and Amendment 147-11471-00041, issued April 18, 2002, and 326 IAC 2-2 (PSD), for stack exhausts (S01, S06, S08, S09A, S09B, S09C, S17), and pursuant to this permit for the mist eliminators' stack exhausts (S11, S16), visible emission notations shall be performed once per working shift for each. These notations shall be taken once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously,

"normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee, including trained personnel under contract with the source, is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(2) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10 for the baghouses (S01, S05, S08, S09C) and condition 12 for the mist eliminators (S11, S16), and 326 IAC 2-2 (PSD), the Permittee shall record the total static pressure drop. Pursuant to this permit, these recordings shall be taken at least once per shift when the process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the range of 1.5 and 5.0 inches of water. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. The gauge employed to take the pressure drop across the baghouses (S01, S05, S08, S09C) shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm$ 2% of full scale reading for S01, S05 and S09C, and within $\pm$ 0.25% (or $\pm$ 5 digits at 22 degrees Celsius) for S08. The gauge employed to take the pressure drop across the mist elimination systems shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within 0.25% (or $\pm$ 5 digits at 22 degrees Celsius) of full scale reading for S11 and S16. The instruments shall be quality assured and maintained as specified by the vendor.

Pursuant to Permit 147-11471-00041, issued April 18, 2002, operation condition 11, and 326 IAC 2-2 (PSD), the Permittee shall record the pH of the scrubbing liquid (if applicable), pressure drop and scrubbing liquid flow rate of the scrubbers (S04, S06, S09A, S09B, S17). Pursuant to this permit, these shall be recorded at least once per shift. The Preventive Maintenance Plan for the scrubber shall contain troubleshooting contingency and response steps for when the pH, pressure drop, and scrubbing liquid flow rate are outside of the normal range for any one reading. The instruments used for determining the pH of the scrubbing liquid (if applicable), pressure drop, and scrubbing liquid flow rate at the inlet of the control device shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. The gauge employed to take the pressure drop across the scrubbers shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm$ 2% of full scale reading for S04, and $\pm$ 0.25% (or $\pm$ 5 digits at 22 degrees Celsius) for S06, S09A, S09B, and S17. The instruments shall be quality assured and maintained as specified by the vendor.

For (1) and (2) above, failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(3) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 10, and 326 IAC 2-2 (PSD), an inspection shall be performed each calendar quarter for the baghouses (S01, S05, S08, S09C). Inspections required by this condition shall not be performed in consecutive months. Defective bags shall be replaced. Pursuant to operation condition 10(e) of the same permit, in the event that a bag's failure has been observed, the process associated with the affected compartments will be shut down immediately until the

failed units have been repaired or replaced.

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 11, and 326 IAC 2-2 (PSD), an inspection shall be performed each calendar quarter of the scrubbers (S02, S04, S06, S09A, S09B, S17). Inspections required by this condition shall not be performed in consecutive months. Defective scrubber components shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber components replaced. In the event that failure of any scrubber has been observed, the process associated with the affected unit will be shut down immediately until the failed unit has been repaired or replaced.

Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 12, and 326 IAC 2-2 (PSD), mist eliminator inspections shall be performed each calendar quarter of the mist elimination systems (S11, S16). Inspections required by this condition shall not be performed in consecutive months. Defective mist eliminator components shall be replaced. In the event that a mist elimination system's failure has been observed, the process associated with the affected unit will be shut down immediately until the failed unit has been repaired or replaced.

For the inspections listed in part (3) above, based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

The baghouses, scrubbers, mist eliminators, SCR, and CEMS, installed under construction permit approval CP 147-6713-00041, must operate properly to ensure compliance with their current PM and/or PM-10 BACT requirements and 326 IAC 2-7 (Part 70).

(b) The SCR (S18) and the CEMS have applicable compliance monitoring conditions as specified below:

(1) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 38(c), and 326 IAC 2-2 (PSD), an inspection shall be performed each calendar quarter of the SCR. Defective SCR components shall be replaced.

(2) Pursuant to Construction Permit 147-6713-00041, issued February 13, 1997, operation condition 38(d), and 326 IAC 2-2 (PSD), in the event that the SCR's failure has been observed, the affected unit will be shut down immediately until the failed unit has been repaired or replaced. Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

(3) The Permittee shall calibrate, maintain, certify, and operate the continuous monitoring system for the measurement of the $NO_X$ emissions discharged into the atmosphere from S18 in accordance with 326 IAC 3-5-2 and 3-5-7.

(A) The continuous emission monitoring system (CEMS) shall measure $NO_X$ emission rates in pounds per hour. The use of CEMS to measure and record the $NO_X$ hourly emission rates over a twenty-four (24) operating block averaging period is sufficient to demonstrate compliance with the limitations established. The source shall maintain records of emission rates in pounds per hour.

(B) The Permittee shall demonstrate compliance with the established limitation utilizing data from the $NO_X$ CEMS, the fuel flow meter, and Method 19 calculations.

(4) Whenever the NOx continuous emission monitoring system is malfunctioning or down for repairs or adjustments, monitoring of the SCR operating parameters for ammonia flow rate and inlet duct temperature, shall be implemented. The parameters are as follows:

(A) The Permittee shall record the ammonia flow rate and inlet duct temperature at least four (4) times per hour until the primary CEM or a backup CEM is brought online and functioning properly. The Preventive Maintenance Plan for the SCR shall contain troubleshooting contingency and corrective actions for when the readings are outside

of the normal range for any one reading during downtime of the NOx CEMS.

(B) The instrument used for determining the ammonia flow rate and inlet duct temperature shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The monitoring of part (b) above is necessary because the SCR and CEMS must operate properly to ensure compliance with their current NOx BACT requirements and 326 IAC 2-7 (Part 70).

(c) Pursuant to 40 CFR 63.343(c)(1)(ii), when using a composite mesh-pad system to comply with the limit specified, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day when a hard chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant values for pressure drop established during multiple performance tests.

The monitoring of part (c) above is required by the applicable NESHAPs and is necessary because the mesh-pad system must operate properly to ensure compliance with their current NESHAP, PM BACT requirements, and 326 IAC 2-7 (Part 70).

MG Industries and Precision Strip, Inc.

These facilities do not have applicable compliance monitoring requirements because under this review both are considered to be insignificant activities as noted previously in this document.

**Conclusion**

The operation of this steel coil finishing operation shall be subject to the conditions of the attached proposed Part 70 Permit No. T147-11043-00041.