

Mr. Barry Smith  
Iron Dynamics, Inc.  
4500 Country Road 59  
Butler, Indiana 46721

Re: Interim Minor Source Modification Approval  
**I-033-12756-00076**

Dear Mr. Smith :

On September 22, 2000, the Office of Air Management received an interim minor permit revision petition from Iron Dynamics, Inc., 4500 Country Road 59, Butler, Indiana, for modifications to a rotary hearth furnace (RHF). Based on the data and information submitted in the petition and the provisions in 326 IAC 2-13-1, this interim minor source modification petition is hereby approved for:

an increase in furnace capacity from 296 MMBtu/hr to 376 MMBtu/hr by adding ten (10) natural gas-fired low-NOx burners. The reduced iron design capacity for the RHF of 96 tons/hr will not change. Emissions will be limited to current emission levels as stated in CP 033-8091-00076.

Detailed conditions will be specified in the final minor source modification 033-12756-00076. This interim minor source modification expires on the effective date of the final minor source modification. This interim minor source modification may be revoked after its effective date upon a written finding by the OAM that any of the reasons for denial in 326 IAC 2-13-1(h) exist or if the final minor source modification is denied. The facilities subject to this approval may not operate until the final minor source modification is issued by OAM.

Sincerely,

Paul Dubenetzky, Chief  
Permit Branch  
Office of Air Management

Sims

Enclosure: Interim Permit Evaluation (3 pages)

cc: File -- DeKalb County  
DeKalb County Health Department  
Air Compliance Section -- Doyle Houser  
NRO  
Compliance Data Section -- Karen Nowak  
Permit Tracking -- Janet Mobley  
Title V Permit -- T 033-12614-00076

**Indiana Department of Environmental Management  
Office of Air Management**

**Interim Minor Permit Revision/ Minor Source Modification Evaluation**

Company Name: Iron Dynamics, Inc.	
Location: 4500 County Road 59, Butler, IN 46721	Permit No: I-033-12756-00076
Permit Reviewer: Mack E. Sims    Date Receipt of Application: 09/22/00    Date of review: 10/16/00	
Description of the interim construction: increase in furnace capacity of rotary hearth furnace from 296 MMBth/hr to 376 MMBtu/hr	
Date the Application was received + 19 days = 10/11/00	

Interim Petition Applicability: 326 IAC 2-13-1

- (a) Existing Source with valid permit;
- (b) Exemptions:
- (1) construction of a PSD source or PSD modification;
  - (2) construction or modification in nonattainment area that would emit those pollutants for which the nonattainment designation is based.
  - (3) any modification subject to 326 IAC 2-4.1.
- (c) Approve or deny the interim minor permit revision or minor source modification in writing within 19 calendar days, or it becomes the enforceable interim minor permit revision or minor source modification. [326 IAC 2-13-1(d)]

**Instructions: Check (  ) appropriate answers and make a recommendation.**

1. Did the applicant submit a written petition for an interim registration?  
 Yes    Go to question 2.  
 No    Ignore verbal request.
2. Did the applicant pay the \$500 interim permit fee?  
 Yes    Go to question 3.  
 No    Deny the application, pursuant to 326 IAC 2-13-1(c)(1).
3. Did the applicant state acceptance of federal enforceability of an interim minor permit revision or minor source modification?  
 Yes    Go to question 4.  
 No    Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(D).
4. Did the applicant or its authorized agent sign the application?  
 Yes    Go to question 5.  
 No    Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(E).
5. Did the applicant submit a notarized affidavit stating that the applicant will proceed at its own risk (if the interim minor permit revision or minor source modification is issued), including, but not limited to:
  - (a) Financial risk,
  - (b) Risk that additional emission controls may be required,
  - (c) Risk that the final registration may be denied. Yes    Go to question 6.  
 No    Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(F).

6. Did the applicant begin construction prior to submitting the interim minor permit revision or minor source modification application?  
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(6).  
 No Go to question 7.
7. What is the type of the interim construction?  
 New Source Deny the application, pursuant to 326 IAC 2-13-1(a)  
 Modification to an existing source Go to question 8.
8. Did the applicant present data in the interim minor permit revision or minor source modification that is sufficient to determine PSD, NSPS, NESHAP, and state rule compliance?  
 Yes Go to question 9.  
 No Deny the application pursuant to:  
326 IAC 2-13-1(c)(2)(B), for PSD ;  
326 IAC 2-13-1(c)(2)(C), for NSPS or NESHAP;  
326 IAC 2-13-1(c)(2)(C), for state rules.
9. Is the proposed modification to be located in a nonattainment area?  
 Yes Go to question 10.  
 No Go to question 11. County: DeKalb County
10. Will the proposed modification emit the pollutant for which the area is nonattainment in quantities greater than the significant levels?  
 Yes Deny the application, pursuant to 326 IAC 2-13-1(a)(2).  
 No Go to question 11.
11. Did the petition include a complete description of the process?  
 Yes Go to question 12.  
 No Deny the petition, pursuant to 326 IAC 2-13-1(c)(2)(B).
12. Did the interim minor permit revision or minor source modification petition contain conditions accepting either emission controls (baghouse, afterburners, scrubbers, etc.) or enforceable limits or other suitable restriction to avoid PSD applicability; as well as control parameters (incinerator operating temperature, baghouse pressure drop, etc.)? The specific limits must be explicitly spelled out (i.e.: The gas consumption of the boiler shall not exceed 29 million cubic feet per month.) A statement such as that the company agrees to conditions such that PSD rules are not applicable is not acceptable.  
 Yes Go to question 13.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).
13. Do the emission controls and/or throughput limits prevent PSD applicability?  
 Yes Go to question 14.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).
14. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable New Source Performance Standards (NSPS) (40 CFR 60)?  
 Yes Go to question 15.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
15. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable National Emission Standards for Hazardous Air Pollutants (NESHAP)?  
 Yes Go to question 16.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).

16. Will the modification, after application of all emission controls and/or throughput limitations, comply with all applicable state rules?  
 Yes Go to question 17.  
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
17. Does the applicant dispute applicability of any applicable state or federal rule?  
 Yes Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).  
 No Go to question 18.
18. Is there good reason to believe that the applicant does not intend to construct in accordance with the interim minor permit revision or minor source modification petition?  
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(1).  
 No Go to question 19.
19. Is there a good reason to believe that information in the petition has been falsified?  
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(7).  
 No Approve the interim minor permit revision or minor source modification petition.

Recommendation: approve the interim petition

Date the denial was drafted: October 16, 2000

Method of informing the applicant: by telephone on October 17, 2000

Comments: Emissions after modification are limited to levels before modification (PSD 033-8091-00043) Rotary hearth furnace has not operated long enough nor at levels high enough to establish past actual baseline period. Past actual emissions are therefore equal to potential to emit. Emissions for modification determined by future potential to emit minus past actual emissions. Therefore, emissions for modification are equal to 80MMBtu/hr increase.