

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Worthington Steel Company
100 Worthington Drive
Porter, Indiana 46304**

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

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 2-8 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.

Operation Permit Renewal No.: F127-12889-00040	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 10, 2001 Expiration Date: August 10, 2006

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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 through A.3 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 2-8-3(b)]

The Permittee owns and operates a stationary steel pickling and steel slitting operation.

Authorized individual:	Daniel Stoettner
Source Address:	100 Worthington Drive, Porter, Indiana 46304
Mailing Address:	100 Worthington Drive, Porter, Indiana 46304
SIC Code:	3399 and 3316
Source Location Status:	Porter
County Status:	Nonattainment for ozone Attainment area for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) natural gas fired boiler, identified as # 240326, with a maximum heat input rate of 19.9 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack identified as S01, installed in 1990.
- (b) One (1) push/pull hydrochloric acid (HCl) pickling line with maximum capacity of 145 tons per hour, identified as P01, with a packed tower scrubber to control PM10 and HCl emissions, and exhausting through one (1) stack identified as CD01.
- (c) One (1) scale breaker with a maximum capacity of 145 tons per hour, identified as P02, with a fabric filter to control PM10 emissions, and exhausting to a point designated as CD02, inside the building.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes 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;
 - (1) sixteen (16) natural gas-fired space heaters with a combined heat input rate of 36.0 MMBtu per hour.
- (b) The following HAP storage tanks:
 - (1) three (3) raw acid tanks, identified as T01, T02, and T11, each with a maximum capacity of 17,000 gallons;
 - (2) three (3) spent acid tanks, identified as T03, T04, and T12, each with a maximum capacity of 17,000 gallons;

- (c) The following VOC storage tanks:
 - (1) one (1) Quisol storage tank, identified as T05, with a maximum capacity of 300 gallons;
 - (2) one (1) slushing oil storage tank, identified as T06, with a maximum capacity of 8,813 gallons;
 - (3) one (1) waste oil storage tank, identified as T07, with a maximum capacity of 8,813 gallons;
 - (4) one (1) hydraulic oil storage tank, identified as T08, with a maximum capacity of 564 gallons;
 - (5) one (1) diesel fuel storage tank, identified as T09, with a maximum capacity of 564 gallons;
 - (6) one (1) lubricating oil storage tank, identified as T10, with a maximum capacity of 300 gallons;
 - (7) one (1) Towedraw A-840 dispenser tank, with a maximum capacity of 60 gallons;
 - (8) one (1) Vactra # 2 dispenser tank, with a maximum capacity of 60 gallons;
 - (9) one (1) Mobil Fluid 424 dispenser tank, with a maximum capacity of 60 gallons;
 - (10) one (1) Gearlube HD 80W90 dispenser tank, with a maximum capacity of 60 gallons;
 - (11) one (1) Citgo Hydraulic A/W 32 dispenser tank, with a maximum capacity of 60 gallons;
 - (12) one (1) Mobil Gear 626 dispenser tank, with a maximum capacity of 60 gallons;
 - (13) one (1) Citgo Supergaurd 10W30 dispenser tank, with a maximum capacity of 60 gallons;
 - (14) one (1) Nalco Steelshield 6292 dispenser tank, with a maximum capacity of 60 gallons.
- (d) One (1) maintenance shop parts cleaner.
- (e) One (1) Danly press with maximum striking force of 1500 tons.
- (f) Slitter consisting of:
 - (1) three (3) 72" slitters;
 - (2) one (1) 36" slitter.
- (g) Mills consisting of:
 - (1) one (1) 14" mill;
 - (2) one (1) 20" mill;
 - (3) one (1) Temper mill.
- (h) One (1) cut to length line operation.
- (i) One (1) pickle line oiler.
- (j) One (1) skid department woodworking operation.
- (k) One (1) solvent wipe cleaning operation.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

- (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, including any term or condition from a previously issued construction or operation permit, 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.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, 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.

B.4 Enforceability [326 IAC 2-8-6]

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.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or,

for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) 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.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 an authorized individual 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) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (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 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement the Preventive Maintenance Plans (PMPs) submitted on December 15, 1995, including the following information on each facility:
 - (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) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation 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 contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.14 Emergency Provisions [326 IAC 2-8-12]

- (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, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

~~[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]~~

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)]~~ The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]~~
- (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 2-8-8(b)]~~
- (d) The reopening and revision of this permit, under ~~326 IAC 2-8-8(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 2-8-8(c)]~~

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

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

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

(B) 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 until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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 2-8 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 needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (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 2-8-15(a) and the following additional conditions:

- (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 by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in 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 2-8-15(c).

- (d) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) 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 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (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) 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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
 - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-3 (Emission Offset), emissions of particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.5 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.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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.7 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)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.10 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. 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

-
- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed 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.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(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 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 ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a flow rate, pressure drop or concentration, 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 ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

The ERP does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (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.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the

documents in which the information is found. The elements of the compliance monitoring plan are:

- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (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. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that 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 an administrative amendment 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) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform

the required monitoring.

- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (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 documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.19 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements 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). The annual 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 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records 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. These records shall be kept 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.21 General Reporting Requirements [326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (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, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.

C.22 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)]:

One (1) natural gas fired boiler, identified as # 240326, with a maximum heat input rate of 19.9 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack identified as S01, installed in 1990.

(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 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart Dc]

Pursuant to the New Source Performance Standards, 326 IAC 12, and 40 CFR 60.40c through 60.48c, Subpart Dc. Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each month.

D.1.2 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 (c)), particulate emissions from one (1) boiler (ID # 240326) shall be limited by the following:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{pounds of particulate matter emitted per million Btu heat input}$$

Q = total source maximum operating capacity rating in MMBtu per hour heat input.

This is equivalent to 0.50 pounds of PM per MMBtu of heat input.

D.1.3 FESOP PM10 limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM10 shall not exceed 0.50 pounds of PM10 per MMBtu of heat input for boiler # 240326.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

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

There are no compliance monitoring requirements specifically applicable to the facility.

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

D.1.5 Record Keeping Requirements

(a) Pursuant to FESOP 127-5229-00040, issued on December 10, 1996, one (1) boiler (ID # 240326), which only combusts natural gas, shall comply with the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). This source has complied with the notification requirements under 40 CFR 60.48c (a). The applicable record keeping requirements are as follows:

(1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each month.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A semi-annual summary of the information to document compliance with Condition D.1.1, and the natural gas fired boiler certification shall be submitted 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 six (6) month period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) One (1) scale breaker with a maximum capacity of 145 tons per hour, identified as P02, with a fabric filter to control PM10 emissions, and exhausting to a point designated as CD02, inside 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 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the scale breaker (P02) shall not exceed 55.15 pounds per hour when operating at a process weight rate of 145 tons per hour. The pounds per hour limitation was calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Particulate Matter (PSD) [326 IAC 2-2]

PM emissions from the scale breaker (P02) shall not exceed 2.74 pounds of PM per hour (equivalent to maximum PM emissions of 12.0 tons per year), such that the source wide PM emissions are less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

D.2.3 FESOP PM10 limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM10 from the scale breaker (P02) shall not exceed 3.0 pounds of PM10 per hour.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.5 Particulate Matter (PM)

Pursuant to F127-5229-00040, issued on December 10, 1996, and in order to comply with Conditions D.2.1, D.2.2 and D.2.3, the fabric filter for PM control shall be in operation and control emissions from the scale breaker (P02) at all times that the scale breaker (P02) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.6 Visible Emissions Notations

- (a) Visible emission notations of the scale breaker stack exhaust shall be performed once per shift 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the fabric filter used in conjunction with the scale breaker operation (P02), at least once per shift when the process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the fabric filter shall be maintained within the range of 0.1 and 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

D.2.8 Fabric Filter Inspections

An inspection shall be performed each calendar quarter of all fabric filters controlling the scale breaker operation (P02) when venting to the atmosphere. A fabric filter inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective fabric filters shall be replaced.

D.2.9 Broken or Failed Fabric Filter Detection

In the event that fabric filter failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) For single compartment fabric filters, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the scale breaker stack exhaust once per shift.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain the following:
 - (1) Once per shift records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) One (1) push/pull hydrochloric acid (HCl) pickling line with maximum capacity of 145 tons per hour, identified as P01, with a packed tower scrubber to control PM10 and HCl emissions, and exhausting through one (1) stack identified as CD01.
- (b) The following VOC and HAP storage tanks:
 - (1) three (3) raw acid tanks, identified as T01, T02, and T11, each with a maximum capacity of 17,000 gallons;
 - (2) three (3) spent acid tanks, identified as T03, T04, and T12, each with a maximum capacity of 17,000 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 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the pickling line (P01) shall not exceed 55.15 pounds per hour when operating at a process weight rate of 145 tons per hour. The pounds per hour limitation was calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.3.2 Particulate Matter (PSD) [326 IAC 2-2]

PM emissions from the pickling line (P01) shall not exceed 2.74 pounds of PM per hour (equivalent to maximum PM emission of 12.0 tons per year), such that the source wide PM emissions are less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

D.3.3 FESOP PM10 limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM10 from the pickling line (P01) shall not exceed 3.0 pounds of PM10 per hour.

D.3.4 Hazardous Air Pollutants (HAPs)

Hydrochloric acid (HCl) emissions from the pickling line (P01) shall not exceed 1.62 pounds per hour. This will limit the source wide HCl emission to less than 10 tons per year including the emissions from storage tanks (T01-04, T11 and T12) and fugitive emissions, and satisfy the requirements of 326 IAC 2-8-4 (FESOP).

D.3.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.6 Testing Requirements [326 IAC 2-8-5(a)(1)][326 IAC 2-1.1-11]

During the period between 36 and 48 months after issuance of this permit, the Permittee shall perform HCl emission testing on the pickling line (P01) 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. Testing shall be conducted in accordance with Section C- Performance Testing.

D.3.7 Particulate Matter (PM)

Pursuant to F127-5229-00040, issued on December 10, 1996, and in order to comply with Conditions D.3.1, D.3.2 and D.3.3, the scrubber for PM control shall be in operation and control emissions from the pickling line (P01) at all times that the pickling line (P01) is in operation.

D.3.8 Hazardous Air Pollutants (HAPs)

Pursuant to F127-5229-00040, issued on December 10, 1996, and in order to comply with D.3.4, the scrubber for HCl control shall be in operation and control emissions from the pickling line (P01) at all times that the pickling line (P01) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.9 Visible Emissions Notations

- (a) Visible emission notations of the pickling line stack exhaust shall be performed once per shift during normal daylight operations. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.3.10 Parametric Monitoring

The permittee shall record pressure and scrubbing liquid (water) flow rate readings from the packed tower scrubber controlling HCl, at least once per shift when the pickling line is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the packed tower scrubber shall be maintained within the range of 2.0 to 6.0 inches of water and the flow rate for scrubbing liquid shall be maintained within the range of 60 to 90 gallons per minute or a range and flow rate established during the latest stack test. The concentration of HCl in the water shall be monitored once per shift and when it reaches a concentration of 10 grams per liter, or a range established during the latest stack test, the water will be discharged and new water added. The preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading and flow rate are outside of the above mentioned ranges for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

D.3.11 Scrubber Inspections

An inspection shall be performed each calendar quarter of the scrubber controlling the HCl pickling line.

D.3.12 Scrubber Failure Detection

In the event that scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.13 Record Keeping and Reporting Requirements

- (a) To document compliance with Condition D.3.9, the Permittee shall maintain records of visible emission notations of the pickling line stack exhaust once per shift.
- (b) To document compliance with Condition D.3.10, the Permittee shall maintain the following:
 - (1) Flow rate in gallons per minute.
 - (2) HCl concentration of scrubber water.
 - (3) pressure drop across the packed tower scrubber.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] Insignificant Activities as defined in 326 IAC 2-7-1(21):

The following VOC storage tanks:

- (1) one (1) Quisol storage tank, identified as T05, with a maximum capacity of 300 gallons;
- (2) one (1) slushing oil storage tank, identified as T06, with a maximum capacity of 8,813 gallons;
- (3) one (1) waste oil storage tank, identified as T07, with a maximum capacity of 8,813 gallons;
- (4) one (1) hydraulic oil storage tank, identified as T08, with a maximum capacity of 564 gallons;
- (5) one (1) diesel fuel storage tank, identified as T09, with a maximum capacity of 564 gallons;
- (6) one (1) lubricating oil storage tank, identified as T10, with a maximum capacity of 300 gallons;
- (7) one (1) Towedraw A-840 dispenser tank, with a maximum capacity of 60 gallons;
- (8) one (1) Vactra # 2 dispenser tank, with a maximum capacity of 60 gallons;
- (9) one (1) Mobil Fluid 424 dispenser tank, with a maximum capacity of 60 gallons;
- (10) one (1) Gearlube HD 80W90 dispenser tank, with a maximum capacity of 60 gallons;
- (11) one (1) Citgo Hydraulic A/W 32 dispenser tank, with a maximum capacity of 60 gallons;
- (12) one (1) Mobil Gear 626 dispenser tank, with a maximum capacity of 60 gallons;
- (13) one (1) Citgo Superguard 10W30 dispenser tank, with a maximum capacity of 60 gallons;
- (14) one (1) Nalco Steelshield 6292 dispenser tank, with a maximum capacity of 60 gallons.

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

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.1 Record Keeping and Reporting Requirements

- (a) Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall:
 - (1) maintain the following information for the fourteen (14) VOL storage tanks;
 - (A) The vessel identification number,
 - (B) The vessel dimensions, and
 - (C) The vessel capacity;
 - (2) submit to OAQ a report containing the above information;
 - (3) keep all records for the life of the vessel.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Worthington Steel Company
Source Address: 100 Worthington Drive, Porter, Indiana 46304
Mailing Address: 100 Worthington Drive, Porter, Indiana 46304
FESOP No.: F127-12889-00040

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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Worthington Steel Company
Source Address: 100 Worthington Drive, Porter, Indiana 46304
Mailing Address: 100 Worthington Drive, Porter, Indiana 46304
FESOP No.: F127-12889-00040

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), 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 Describe:
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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Worthington Steel Company
Source Address: 100 Worthington Drive, Porter, Indiana 46304
Mailing Address: 100 Worthington Drive, Porter, Indiana 46304
FESOP No.: F127-12889-00040

9	Natural Gas Only
9	Alternate Fuel burned
From: _____	To: _____

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:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Worthington Steel Company
 Source Address: 100 Worthington Drive, Porter, Indiana 46304
 Mailing Address: 100 Worthington Drive, Porter, Indiana 46304
 FESOP No.: F127-12889-00040

Months: _____ to _____ Year: _____

<p>This report is an affirmation that the source has met all the requirements stated in this permit. 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".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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 Federally Enforceable State Operating
Permit (FESOP) Renewal

Source Name: Worthington Steel Company
Source Location: 100 Worthington Drive, Porter, Indiana 46304
SIC Code: 3399 and 3316
County: Porter
Operation Permit No.: F127-12889-00040
Permit Reviewer: Adeel Yousuf /EVP

On May 29, 2001, the Office of Air Quality (OAQ) had a notice published in the Vindetter Times Munster, Indiana, stating that Worthington Steel Company had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a steel pickling and steel slitting operation. The notice also stated that OAQ proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP Renewal should be issued as proposed.

On June 20, 2001, Bruce Thorn from Worthington Steel Company submitted comments on the proposed FESOP Renewal. The summary of the comments and corresponding responses is as follows (bolded language has been added, the language with a line through it has been deleted):

Comment # 1

Compliance Monitoring Plan

We request that the CMP required under section C.17 be removed. This plan is unnecessary since it duplicates provisions of the preventative maintenance plan and the source specific monitoring requirements in section D. Continuous compliance is adequately demonstrated using existing parametric monitoring and record keeping. Worthington is prohibited from operating the scale breaker and pickle line unless the control equipment is operating.

Response # 1

The Compliance Monitoring Plan is made up of the Compliance Response Plan (CRP), the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. Condition C.17 Compliance Monitoring Plan (CMP) allows source to use its Preventive Maintenance Plan (PMP) as a large part of CRP and then follow it as appropriate. No changes were made to the permit as a result of this comment.

Comment # 2

Gas Fired Boiler

We ask that both PM and PM10 be limited to 0.5 lbs/MMBtu. All PM from this source will have an aerodynamic diameter less than 10 microns. The new PM10 limit of 0.228 lbs/hr is overly restrictive and reduces the allowable limit by a factor of 10. The proposed PM10 limit becomes unnecessary when the changes to the PM10 limits discussed below are made.

Response # 2

The PM10 limit for the 19.9 MMBtu/hr natural gas fired boiler is changed to 0.5 lbs/MMBtu. This limit is equivalent to 43.58 tons per year of PM10, based on 8760 hours of full capacity operation. As presented in the Technical Support Document (TSD), the boiler is subject to the requirements of 326 IAC 6-2-4 (Particulate Emission Limitations for Source of Indirect Heating), and the allowable particulate matter (PM) emission rate has been determined as 0.5 pound of PM per MMBtu of heat input. Since the FESOP PM10 limit for the source will remain below 100 tons per year with revised facility limit, the following change has been made to Section D.1.3:

D.1.3 FESOP PM10 limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM10 shall not exceed **0.50 pounds of PM10 per MMBtu of heat input** ~~0.228 pounds of PM10 per hour~~ for boiler # 240326.

Comment # 3

Scale Breaker

The scale breaker vents through a cartridge type fabric filter. For accuracy we ask that the references to a baghouse be modified with the correct control equipment and the provisions in section D.2.7, D.2.8 and D.2.9 be modified accordingly. The type of control has not been changed but was incorrectly identified on the original permit application.

Response # 3

The following changes have been made to sections D.2.7, D.2.8 and D.2.9 as a result of this comment.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the ~~baghouse~~ **fabric filter** used in conjunction with the scale breaker operation (P02), at least once per shift when the process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the ~~baghouse~~ **fabric filter** shall be maintained within the range of 0.1 and 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

D.2.8 ~~Baghouse~~ **Fabric Filter** Inspections

An inspection shall be performed each calendar quarter of all ~~bags~~ **fabric filters** controlling the scale breaker operation (P02) when venting to the atmosphere. A ~~baghouse~~ **fabric filter** inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective ~~bags~~ **fabric filters** shall be replaced.

D.2.9 Broken or Failed ~~Bag~~ **Fabric Filters** Detection

In the event that ~~bag~~ **fabric filter** failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment ~~baghouses~~ **fabric filters**, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Comment # 4

As proposed, PM is limited to 55.15 lbs/hr, 124 TPY and PM10 to 11.19 lbs/hr, 49 TPY. Actual emissions from the scale breaker will be a small fraction of the proposed allowable. The high limits will restrict future expansion by placing Worthington just shy of the major source threshold. We ask that the PM and PM10 emission limits be changed to 3.0 lbs/hr and 1.0 ton/month as they were in the original FESOP.

Response # 4

As permitted in original FESOP (F127-5229-00040), the PM limit is revised to be expressed as a short term limit of 2.74 pounds per hour equivalent to 12.0 tons per year (yearly limit), and PM10 limit is revised to 3.0 lbs/hr (hourly limit). Following changes have been made to sections D.2.2 and D.2.3 as a result of this comment.

D.2.2 Particulate Matter (PSD) [326 IAC 2-2]

PM emissions from the scale breaker (P02) shall not exceed ~~2.74 124.0 tons~~ **pounds** of PM per ~~year~~ **hour (equivalent to maximum PM emissions of 12.0 tons per year)**, such that the source wide PM emissions are less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

D.2.3 FESOP PM10 limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM10 from the scale breaker (P02) shall not exceed **3.0**
~~11.19~~ pounds of PM10 per hour.

Comment # 5

As proposed, PM is limited to 55.15 lbs/hr, 124 TPY and PM10 to 11.19 lbs/hr, 49 TPY. As discussed above the high limits are unnecessary and restrict future expansion. We ask that the PM and PM10 emission limits be change to 3.0 lbs/hr and 1.0 ton/month as they were in the original FESOP.

Response # 5

As permitted in original FESOP (F127-5229-00040), the PM limit is revised to be expressed as a short term limit of 2.74 pounds per hour equivalent to 12.0 tons per year (yearly limit), and PM10 limit is revised to 3.0 lbs/hr (hourly limit). Following changes have been made to sections D.2.2 and D.2.3 as a result of this comment.

D.3.2 Particulate Matter (PSD) [326 IAC 2-2]

PM emissions from the pickling line (P01) shall not exceed **2.74** ~~124.0 tons~~ **pounds** of PM per ~~year~~ **hour (equivalent to maximum PM emission of 12.0 tons per year)**, such that the source wide PM emissions are less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

D.3.3 FESOP PM10 limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM10 from the pickling line (P01) shall not exceed **3.0**
~~11.19~~ pounds of PM10 per hour.

The following revisions have been made to the Technical Support Document under the Potential to Emit section (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

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 Federally Enforceable State Operating Permit. The **bolded** number indicates the new limited PTE, and the number with a ~~line~~ through it indicates the old FESOP (F127-5229-00040) limited PTE.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Boiler # 240326	1.20 0.20 43.58**	1.20 0.70 43.58**	0.10	0.20 0.50	3.10 7.30	12.20 8.70	0.00 0.16
Pickle Line (P01)	48.05 124.0 12.0	48.05 49.0 12.0	0.00	0.00	0.00	0.00	7.12 (HCl)
Scale Breaker (P02)	48.05 124.0 12.0	48.05 49.0 12.0	0.00	0.00	0.00	0.00	0.00
Storage Tanks	0.00	0.00	0.00	0.00	0.00	0.00	0.45 (HCl)
Fugitive Emissions	0.00	0.00	0.00	11.29	0.00	0.00	1.24 (HCl)
Insignificant Combustion	1.70 0.30	1.70 1.20	0.10	0.70 0.90	3.10 13.20	14.10 15.80	0.00 0.29
Total Emissions	99.00 < 250	99.00 < 100	0.2 < 100	12.19 < 25	6.20 < 100	26.30 < 100*	8.84 < 25.00

* For title V purposes, the major stationary source threshold level for oxides of nitrogen (NOx) in severe non-attainment areas (Lake & Porter counties) has been increased from 25 tons per year to 100 tons per year, however for Emission offset, threshold level for NOx is less than 25 tons per year to be a minor source.
 ** Boiler PM and PM10 emissions = 0.5 lb/MMBtu x 19.90 MMBtu/hr x 8760hrs/yr x 1ton/2000 lb = 43.58 TPY

Comment # 6

HCl Pickling Line

The VOC and HAP storage tanks referenced in the facility description should be deleted. With the exception of the raw and spent acid tanks the sources are unrelated to the pickle line operation. All of these tanks are listed as insignificant sources in section A.3.

Response # 6

Except for the three (3) raw acid and three (3) spent acid storage tanks which are related to the HCl process lin P01, the VOC storage tanks listed in (b) of section D.3, Facility Description have been removed. Instead, this complete listing is moved to a new Section D.4 as Insignificant Activities along with related Condition D.3.13(c) which is renumbered as D.4.1. The following changes have been made as a result of this comment.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes 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;
 - (1) sixteen (16) natural gas-fired space heaters with a combined heat input rate of 36.0 MMBtu per hour.

- (b) The following ~~VOC and HAP~~ storage tanks:
 - (1) three (3) raw acid tanks, identified as T01, T02, and T11, each with a maximum capacity of 17,000 gallons;
 - (2) three (3) spent acid tanks, identified as T03, T04, and T12, each with a maximum capacity of 17,000 gallons;
 - ~~(3) one (1) Quisol storage tank, identified as T05, with a maximum capacity of 300 gallons;~~
 - ~~(4) one (1) slushing oil storage tank, identified as T06, with a maximum capacity of 8,813 gallons;~~
 - ~~(5) one (1) waste oil storage tank, identified as T07, with a maximum capacity of 8,813 gallons;~~
 - ~~(6) one (1) hydraulic oil storage tank, identified as T08, with a maximum capacity of 564 gallons;~~
 - ~~(7) one (1) diesel fuel storage tank, identified as T09, with a maximum capacity of 564 gallons;~~
 - ~~(8) one (1) lubricating oil storage tank, identified as T10, with a maximum capacity of 300 gallons;~~
 - ~~(9) one (1) Towedraw A-840 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(10) one (1) Vactra # 2 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(11) one (1) Mobil Fluid 424 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(12) one (1) Gearlube HD-80W90 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(13) one (1) Citgo Hydraulic A/W 32 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(14) one (1) Mobil Gear 626 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(15) one (1) Citgo Supergaurd 10W30 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(16) one (1) Nalco Steelshield 6292 dispenser tank, with a maximum capacity of 60 gallons.~~

- (c) The following VOC storage tanks:
 - (1) one (1) Quisol storage tank, identified as T05, with a maximum capacity of 300 gallons;
 - (2) one (1) slushing oil storage tank, identified as T06, with a maximum capacity of 8,813 gallons;
 - (3) one (1) waste oil storage tank, identified as T07, with a maximum capacity of 8,813 gallons;
 - (4) one (1) hydraulic oil storage tank, identified as T08, with a maximum capacity of 564 gallons;
 - (5) one (1) diesel fuel storage tank, identified as T09, with a maximum capacity of 564 gallons;

- (6) one (1) lubricating oil storage tank, identified as T10, with a maximum capacity of 300 gallons;**
 - (7) one (1) Towedraw A-840 dispenser tank, with a maximum capacity of 60 gallons;**
 - (8) one (1) Vactra # 2 dispenser tank, with a maximum capacity of 60 gallons;**
 - (9) one (1) Mobil Fluid 424 dispenser tank, with a maximum capacity of 60 gallons;**
 - (10) one (1) Gearlube HD 80W90 dispenser tank, with a maximum capacity of 60 gallons;**
 - (11) one (1) Citgo Hydraulic A/W 32 dispenser tank, with a maximum capacity of 60 gallons;**
 - (12) one (1) Mobil Gear 626 dispenser tank, with a maximum capacity of 60 gallons;**
 - (13) one (1) Citgo Supergaurd 10W30 dispenser tank, with a maximum capacity of 60 gallons;**
 - (14) one (1) Nalco Steelshield 6292 dispenser tank, with a maximum capacity of 60 gallons.**
- (ed) One (1) maintenance shop parts cleaner.
- (de) One (1) Danly press with maximum striking force of 1500 tons.
- (ef) Slitter consisting of:
 - (1) three (3) 72" slitters;
 - (2) one (1) 36" slitter.
- (fg) Mills consisting of:
 - 1. one (1) 14" mill;
 - 2. one (1) 20" mill;
 - 3. one (1) Temper mill.
- (gh) One (1) cut to length line operation.
- (hi) One (1) pickle line oiler.
- (ij) One (1) skid department woodworking operation.
- (jk) One (1) solvent wipe cleaning operation.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) One (1) push/pull hydrochloric acid (HCl) pickling line with maximum capacity of 145 tons per hour, identified as P01, with a packed tower scrubber to control PM10 and HCl emissions, and exhausting through one (1) stack identified as CD01.

- (b) The following ~~VOG and~~ HAP storage tanks:
 - (1) three (3) raw acid tanks, identified as T01, T02, and T11, each with a maximum capacity of 17,000 gallons;
 - (2) three (3) spent acid tanks, identified as T03, T04, and T12, each with a maximum capacity of 17,000 gallons;
 - ~~(3) one (1) Quisol storage tank, identified as T05, with a maximum capacity of 300 gallons;~~
 - ~~(4) one (1) slushing oil storage tank, identified as T06, with a maximum capacity of 8,813 gallons;~~
 - ~~(5) one (1) waste oil storage tank, identified as T07, with a maximum capacity of 8,813 gallons;~~
 - ~~(6) one (1) hydraulic oil storage tank, identified as T08, with a maximum capacity of 564 gallons;~~
 - ~~(7) one (1) diesel fuel storage tank, identified as T09, with a maximum capacity of 564 gallons;~~
 - ~~(8) one (1) lubricating oil storage tank, identified as T10, with a maximum capacity of 300 gallons;~~
 - ~~(9) one (1) Towerdraw A-840 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(10) one (1) Vactra # 2 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(11) one (1) Mobil Fluid 424 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(12) one (1) Gearlube HD 80W90 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(13) one (1) Citgo Hydraulic A/W 32 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(14) one (1) Mobil Gear 626 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(15) one (1) Citgo Supergaurd 10W30 dispenser tank, with a maximum capacity of 60 gallons;~~
 - ~~(16) one (1) Nalco Steelshield 6292 dispenser tank, with a maximum capacity of 60 gallons.~~

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

D.3.13 Record Keeping and Reporting Requirements

- (a) To document compliance with Condition D.3.9, the Permittee shall maintain records of visible emission notations of the pickling line stack exhaust once per shift.

- (b) To document compliance with Condition D.3.10, the Permittee shall maintain the following:

- (1) Flow rate in gallons per minute.
- (2) HCl concentration of scrubber water.
- (3) Pressure drop across the packed tower scrubber.

~~(c) Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall:~~

~~(1) maintain the following information for the fourteen (14) VOL storage tanks;~~

- ~~(A) The vessel identification number;~~
- ~~(B) The vessel dimensions; and~~
- ~~(C) The vessel capacity;~~

~~(2) submit to OAQ a report containing the above information;~~

~~(3) keep all records for the life of the vessel.~~

~~(dc)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The VOC storage tanks originally listed in Section D.3 are deleted because they qualify as insignificant activities and are unrelated to the pickle line operation. A new D section (D.4) containing Insignificant activities is added in the permit as follows:

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] Insignificant Activities as defined in 326 IAC 2-7-1(21):

The following VOC storage tanks:

- (1) one (1) Quisol storage tank, identified as T05, with a maximum capacity of 300 gallons;
- (2) one (1) slushing oil storage tank, identified as T06, with a maximum capacity of 8,813 gallons;
- (3) one (1) waste oil storage tank, identified as T07, with a maximum capacity of 8,813 gallons;
- (4) one (1) hydraulic oil storage tank, identified as T08, with a maximum capacity of 564 gallons;
- (5) one (1) diesel fuel storage tank, identified as T09, with a maximum capacity of 564 gallons;
- (6) one (1) lubricating oil storage tank, identified as T10, with a maximum capacity of 300 gallons;
- (7) one (1) Towedraw A-840 dispenser tank, with a maximum capacity of 60 gallons;
- (8) one (1) Vactra # 2 dispenser tank, with a maximum capacity of 60 gallons;
- (9) one (1) Mobil Fluid 424 dispenser tank, with a maximum capacity of 60 gallons;
- (10) one (1) Gearlube HD 80W90 dispenser tank, with a maximum capacity of 60 gallons;
- (11) one (1) Citgo Hydraulic A/W 32 dispenser tank, with a maximum capacity of 60 gallons;
- (12) one (1) Mobil Gear 626 dispenser tank, with a maximum capacity of 60 gallons;
- (13) one (1) Citgo Superguard 10W30 dispenser tank, with a maximum capacity of 60 gallons;
- (14) one (1) Nalco Steelshield 6292 dispenser tank, with a maximum capacity of 60 gallons.

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

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.1 Record Keeping and Reporting Requirements

(a) Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall:

- (1) maintain the following information for the fourteen (14) VOL storage tanks;
 - (A) The vessel identification number,
 - (B) The vessel dimensions, and
 - (C) The vessel capacity;

- (2) submit to OAQ a report containing the above information;**
 - (3) keep all records for the life of the vessel.**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Upon further review, and in addition to the Comments/Responses presented above, the OAQ has decided to make the following changes to the FESOP Renewal. Again, bolded language has been added and the language with a line through it has been deleted.

1. A.3 Insignificant Activities

The correct capacity of the tank listed in Section A.3 (b)(12) (renumbered as b (10)) is 60 gallons and not 50 gallons as stated in the draft permit. The following change has been made to section A.3 Insignificant Activities to correct the capacity:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (~~b~~c) The following VOC ~~and HAP~~ storage tanks:
(~~42~~10) one (1) Gearlube HD 80W90 dispenser tank, with a maximum capacity of **60** ~~50~~ gallons;

2. B.11 Certification

The following minor grammatical change has been made to section B.11.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 **an** authorized individual 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.

3. B.13 Preventative Maintenance Plan

Following changes have been made to section B.13 Preventive Maintenance Plan.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain **and implement** the Preventive Maintenance Plans (PMPs) submitted on December 15, 1995, including the following information on each facility:
- (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 46206-6015~~

~~The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation 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 contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.

4. D.2.10 Record Keeping Requirements

Following changes have been made to Condition D.2.10 to correctly identify the referenced conditions:

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.56, the Permittee shall maintain records of visible emission notations of the scale breaker stack exhaust once per shift.
- (b) To document compliance with Condition D.2.67, the Permittee shall maintain the following:
 - (1) Once per shift records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.

5. D.3.8 Hazardous Air Pollutants (HAPs)

Following change has been made to Condition D.3.8 to correctly identify the referenced condition:

D.3.8 Hazardous Air Pollutants (HAPs)

Pursuant to F127-5229-00040, issued on December 10, 1996, and in order to comply with D.3.24, the scrubber for HCl control shall be in operation and control emissions from the pickling line (P01) at all times that the pickling line (P01) is in operation.

6. B.10 Compliance with Permit conditions

B.10 Compliance with Permit Conditions has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the permittee's application to renew the permit.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, ~~except those specifically designated as not federally enforceable~~, is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) 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.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Worthington Steel Company
Source Location: 100 Worthington Drive, Porter, Indiana 46304
County: Porter
SIC Code: 3399 and 3316
Operation Permit No.: F127-12889-00040
Permit Reviewer: Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Worthington Steel Company relating to the operation of steel pickling and steel slitting.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) natural gas fired boiler, identified as # 240326, with a maximum heat input rate of 19.9 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack identified as S01, installed in 1990.
- (b) One (1) push/pull hydrochloric acid (HCl) pickling line with maximum capacity of 145 tons per hour, identified as P01, with a packed tower scrubber to control PM10 and HCl emissions, and exhausting through one (1) stack identified as CD01.
- (c) One (1) scale breaker with a maximum capacity of 145 tons per hour, identified as P02, with a baghouse to control PM10 emissions, and exhausting to a point designated as CD02, inside the building.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this renewal review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities at this source during this renewal 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;
 - (1) sixteen (16) natural gas-fired space heaters with a combined heat input rate of 36.0 MMBtu per hour.

- (b) The following VOC and HAP storage tanks:
 - (1) three (3) raw acid tanks, identified as T01, T02, and T11, each with a maximum capacity of 17,000 gallons;
 - (2) three (3) spent acid tanks, identified as T03, T04, and T12, each with a maximum capacity of 17,000 gallons;
 - (3) one (1) Quisol storage tank, identified as T05, with a maximum capacity of 300 gallons;
 - (4) one (1) slushing oil storage tank, identified as T06, with a maximum capacity of 8,813 gallons;
 - (5) one (1) waste oil storage tank, identified as T07, with a maximum capacity of 8,813 gallons;
 - (6) one (1) hydraulic oil storage tank, identified as T08, with a maximum capacity of 564 gallons;
 - (7) one (1) diesel fuel storage tank, identified as T09, with a maximum capacity of 564 gallons;
 - (8) one (1) lubricating oil storage tank, identified as T10, with a maximum capacity of 300 gallons;
 - (9) one (1) Towerdraw A-840 dispenser tank, with a maximum capacity of 60 gallons;
 - (10) one (1) Vactra # 2 dispenser tank, with a maximum capacity of 60 gallons;
 - (11) one (1) Mobil Fluid 424 dispenser tank, with a maximum capacity of 60 gallons;
 - (12) one (1) Gearlube HD 80W90 dispenser tank, with a maximum capacity of 50 gallons;
 - (13) one (1) Citgo Hydraulic A/W 32 dispenser tank, with a maximum capacity of 60 gallons;
 - (14) one (1) Mobil Gear 626 dispenser tank, with a maximum capacity of 60 gallons;
 - (15) one (1) Citgo Supergaurd 10W30 dispenser tank, with a maximum capacity of 60 gallons;
 - (16) one (1) Nalco Steelshield 6292 dispenser tank, with a maximum capacity of 60 gallons.
- (c) One (1) maintenance shop parts cleaner.
- (d) One (1) Danly press with maximum striking force of 1500 tons.
- (e) Slitter consisting of:
 - (1) three (3) 72" slitters;
 - (2) one (1) 36" slitter.
- (f) Mills consisting of:
 - (1) one (1) 14" mill;
 - (2) one (1) 20" mill;
 - (3) one (1) Temper mill.
- (g) One (1) cut to length line operation.
- (h) One (1) pickle line oiler.
- (i) One (1) skid department woodworking operation.
- (j) One (1) solvent wipe cleaning operation.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 127-1979-00040, issued on May 6, 1991; and
- (b) F 127-5229-00040, issued on December 10, 1996; and
- (c) AF127-8305, issued on March 26, 1997.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP 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 FESOP application for the purposes of this review was received on October 24, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (5 pages).

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)
PM	171.94
PM-10	173.34
SO ₂	0.2
VOC	12.69
CO	20.5
NO _x	24.5

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Hydrochloric Acid	358.74
Hexane	0.44
Formaldehyde	0.018
TOTAL	359.2

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels, and has been issued a FESOP. This source will be issued a renewal of their Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

- (c) **Fugitive Emissions**
Since this steel pickling plant, which does not produce steel, is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not 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 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	7.0
PM-10	7.0
SO ₂	0.0
VOC	3.0
CO	2.0
NO _x	7.0
Lead	0.0

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 Federally Enforceable State Operating Permit. The **bolded** number indicates the new limited PTE, and the number with a ~~line~~ through it indicates the old FESOP (F127-5229-00040) limited PTE.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Boiler # 240326	1.20 0.20	1.20 0.70	0.10	0.20 0.50	3.10 7.30	12.20 8.70	0.00 0.16
Pickle Line (P01)	48.05 124.0	48.05 49.0	0.00	0.00	0.00	0.00	7.12 (HCl)
Scale Breaker (P02)	48.05 124.0	48.05 49.0	0.00	0.00	0.00	0.00	0.00
Storage Tanks	0.00	0.00	0.00	0.00	0.00	0.00	0.45 (HCl)
Fugitive Emissions	0.00	0.00	0.00	11.29	0.00	0.00	1.24 (HCl)
Insignificant Combustion	1.70 0.30	1.70 1.20	0.10	0.70 0.90	3.10 13.20	14.10 15.80	0.00 0.29
Total Emissions	99.00 < 250	99.00 < 100	0.2 < 100	12.19 < 25	6.20 < 100	26.30 < 100*	8.81 < 25.00

* For title V purposes, the major stationary source threshold level for oxides of nitrogen (NO_x) in severe non-attainment areas (Lake & Porter counties) has been increased from 25 tons per year to 100 tons per year.

County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	severe
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Porter County has been designated as nonattainment for ozone.

Federal Rule Applicability

- (a) Pursuant to FESOP 127-5229-00040, issued on December 10, 1996, the one (1) steam boiler, identified as # 240326, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc, "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units") because it was constructed after June 9, 1989, and has a maximum design heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour. However, since this boiler only combusts natural gas, it is subject only to the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). The applicable record keeping and reporting requirements are as follows:
- (1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each month.

- (b) The oil storage tanks at this facility are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.112b, Subpart Kb), because the capacities of each of the fixed roof dome tanks are less than 40 cubic meters.
- (c) This steel pickling facility is not subject to the NESHAP (National Emission Standards for Hazardous Air Pollutants), Subpart CCC, 40 CFR 63 because the source is not a major source of HAP. The permittee has chosen to limit source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The source will limit PM emissions from the scale breaker (P02) and the pickling line (P01) to less than 124.0 tons of PM per year for each. The source will be in compliance with the limitation by controlling PM emissions with a baghouse for each of the facilities (P01 and P02). PM emissions are limited such that the source wide PM emissions are less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to FESOP 127-5229-00040, issued on December 10, 1996, this source is subject to 326 IAC 2-6 because it has the potential to emit VOC and NO_x into the air at levels greater than ten (10) tons per year and is located in Porter County. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 2-8-4 (FESOP)

Pursuant to FESOP 127-5229-00040, issued on December 10, 1996, this source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, PM-10 emissions from scale breaker (P02) and the pickling line (P01) will each be controlled at 11.07 lb/hr, equivalent to 48.5 tons per year, by utilizing the baghouse and the packed tower scrubber, respectively as control device. Hydrochloric acid (HCl) emissions will be controlled at 1.63 lb/hr, equivalent to 7.13 tons per year, by utilizing the packed tower scrubber. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Visible 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.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Pursuant to FESOP 127-5229-00040, issued on December 10, 1996, all current operations at this plant were constructed before the rule applicability date of July 27, 1997. Therefore, these facilities are not subject to the requirements of 326 IAC 2-4.1-1.

326 IAC 6-3-2 (Process Operations)

Pursuant to FESOP 127-5229-00040, issued on December 10, 1996, the particulate matter (PM) from the HCl pickling line (P01) and scale breaker (P02) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$55.15 = 55.0 (145)^{0.11} - 40 \quad \text{where } E = 55.15 \\ P = 145$$

Based on the above equation, particulate matter emissions from each, the scale breaker and the pickling line shall be limited to 55.15 pounds per hour. The scale breaker (P02) will be in compliance with the rule by using the baghouse, and the pickling line will be in compliance with the rule by using the packed tower scrubber for PM control.

The baghouse shall be in operation at all times while the scale breaker is in operation, in order to comply with this limit. The packed tower scrubber shall be in operation at all times while the scale breaker is in operation, in order to comply with this limit.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to FESOP 127-5229-00040, issued on December 10, 1996, the one (1) natural gas fired boiler (ID No. 240326 constructed in 1990), with a heat input capacity rating of 19.9 MMBtu per hour, is subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

$$P_t = 1.09/Q^{0.26}$$

where: P_t = maximum allowable particulate matter (PM) emitted per MMBtu heat input
 Q = total source max. operation capacity rating = 19.9 MMBtu/hr

$$P_t = 1.09/19.9^{0.26} = 0.50 \text{ lbs PM/MMBtu}$$

compliance calculation:

Potential PM emissions for boiler # 240326 = 1.9 lb PM/MMCF * (1/1000) (MMCF/MMBtu) = 0.0019 lbs PM/MMBtu

Potential PM emissions for boiler # 240326 (0.0019 lbs PM/MMBtu) are less than allowable 0.5 lbs PM/MMBtu, therefore the one (1) boiler (ID No. 240326) will comply with the requirements of 326 IAC 6-2-4.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The source is not subject to the requirements of 326 IAC 8-7, because the total potential to emit of VOC from the source is less than 25 tons per year.

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirements of the rule if located in Clark, Floyd, Lake or Porter Counties. Each of the fourteen (14) volatile organic liquid (VOL) tanks at the source has a storage capacity less than 39,000 gallons. Therefore, the fourteen (14) VOL storage tanks at the source are only subject to the record keeping and reporting requirements of 326 IAC 8-9-6(a) and (b) and are exempt from other provisions for this rule.

Testing Requirements

Compliance stack test was performed for the HCl emissions from the pickling line (P01) scrubber, to demonstrate compliance with the permit conditions of F127-5229-00040, issued December 10, 1996. The test was conducted at this source on October 28, 1999. The test was determined to be acceptable to IDEM, OAQ and the emission unit was found to be in compliance. Testing will be required on the pickling line scrubber within 36 to 48 months after issuance of this permit since the five year period between the required testing will have expired after that time. Testing will not be required on the scale breaker (P02) as the fabric filter vents inside the building.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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:

1. The scale breaker operation (P02) has applicable compliance monitoring conditions as specified below:
 - (a) Once per shift visible emissions notations of the scale breaker exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee will 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 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 this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (b) The Permittee shall record the total static pressure drop across the baghouse controlling the scale breaker operation, at least once per shift when the scale breaker (P02) is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.0 to 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouse for the scale breaker operation must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-8 (FESOP).

- 2. The pickling line operation (P02) has applicable compliance monitoring conditions as specified below:

- (a) The permittee shall record pressure and scrubbing liquid (water) flow rate readings from the packed tower scrubber controlling HCl, at least once per shift when the pickling line is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the packed tower scrubber shall be maintained within the range of 2.0 to 6.0 inches of water and the flow rate for scrubbing liquid shall be maintained within the range of 60 to 90 gallons per minute or a range and flow rate established during the latest stack test. The concentration of HCl in the water shall be monitored once per shift and when it reaches a concentration of 10 grams per liter, or a range established during the latest stack test, the water will be discharged and new water added. The preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading and flow rate are outside of the above mentioned ranges for any one reading.

These monitoring conditions are necessary because the baghouse for the scale breaker operation must operate properly to ensure compliance with 326 IAC 6-3-2 and 326 IAC 2-8 (FESOP).

- 3. The boiler (ID # 240326) has applicable compliance monitoring conditions as specified below:

- (a) Once per shift visible emissions notations of the boiler stack exhausts shall be performed during normal daylight operations. A trained employee will 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 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 Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because the boiler must operate properly to ensure compliance with 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this steel pickling and slitting operation shall be subject to the conditions of the attached proposed renewal **FESOP No.: F127-12889-00040**.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Worthington Steel Company
Address City IN Zip: 100 Worthington Drive, Porter, Indiana 46304
CP: 127-12889-00040
Pit ID: 127-00040
Reviewer: Adeel Yousuf / EVP
Date: January 20, 2001

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

19.9

174.3

One (1) natural gas fired boiler, identified as 240326 with maximum heat input capacity of 19.9 mmBtu/hr

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.2	0.7	0.1	8.7	0.5	7.3

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Worthington Steel Company

Address City IN Zip: 100 Worthington Drive, Porter, Indiana 46304

CP: 127-12889-00040

Pit ID: 127-00040

Reviewer: Adeel Yousuf / EVP

Date: January 20, 2001

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.830E-04	1.046E-04	6.537E-03	1.569E-01	2.964E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.358E-05	9.588E-05	1.220E-04	3.312E-05	1.830E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Insignificant natural gas fired heaters

Company Name: Worthington Steel Company
Address City IN Zip: 100 Worthington Drive, Porter, Indiana 46304
CP: 127-12889-00040
Pit ID: 127-00040
Reviewer: Adeel Yousuf / EVP
Date: January 20, 2001

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

36.0

315.4

Total of sixteen (16) natural gas fired heaters with total combined heat input capacity of 36.0 mmBtu/hr.

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.3	1.2	0.1	15.8	0.9	13.2

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

MM BTU/HR <100

Insignificant natural gas fired heaters

HAPs Emissions

Company Name: Worthington Steel Company

Address City IN Zip: 100 Worthington Drive, Porter, Indiana 46304

CP: 127-12889-00040

Pit ID: 127-00040

Reviewer: Adeel Yousuf / EVP

Date: January 20, 2001

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.311E-04	1.892E-04	1.183E-02	2.838E-01	5.361E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.884E-05	1.734E-04	2.208E-04	5.992E-05	3.311E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations

Company Name: Worthington Steel Company
Address City IN Zip: 100 Worthington Drive, Porter, Indiana 46304
FESOP: 127-12889-00040
Pit ID: 127-00040
Reviewer: Adeel Yousuf / EVP
Date: January 20, 2001

Uncontrolled Potential Emissions (tons/year)						
Pollutant	Emissions Generating Activity					TOTAL
	Natural Gas boiler	Insignificant Natural Gas Combustion	Scale Breaker and Pickling Line (1)	Fugitive Emissions	Storage Tanks	
PM	0.20	0.30	171.44	0.00	0.00	171.94
PM10	0.70	1.20	171.44	0.00	0.00	173.34
SO2	0.10	0.10	0.00	0.00	0.00	0.20
NOx	8.70	15.80	0.00	0.00	0.00	24.50
VOC	0.50	0.90	0.00	11.29	0.00	12.69
CO	7.30	13.20	0.00	0.00	0.00	20.50
total HAPs	0.16	0.30	357.50	1.24	0.45	359.20
worst case single HAP	(Hexane) 0.157	(Hexane) 0.28	(Hcl) 357.5 (2)	(Hcl) 1.24	(Hcl) 0.45	(Hcl) 357.5 (2)

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year) (3)						
Pollutant	Emissions Generating Activity					TOTAL
	Natural Gas boiler	Insignificant Natural Gas Combustion	Scale Breaker and Pickling Line (1)	Fugitive Emissions	Storage Tanks	
PM	0.20	0.30	24.00	0.00	0.00	24.50
PM10	0.70	1.20	24.00	0.00	0.00	25.90
SO2	0.10	0.10	0.00	0.00	0.00	0.20
NOx	8.70	15.80	0.00	0.00	0.00	24.50
VOC	0.50	0.90	0.00	11.29	0.00	12.69
CO	7.30	13.20	0.00	0.00	0.00	20.50
total HAPs	0.16	0.30	7.12	1.24	0.45	9.27
worst case single HAP	(Hexane) 0.157	(Hexane) 0.28	(Hcl) 7.12 (2)	(Hcl) 1.24	(Hcl) 0.45	(Hcl) 7.12 (2)

Total emissions based on rated capacity at 8,760 hours/year, after control.

Notes:

- (1) Emissions from the Scale breaker and pickling line are obtained from the previous FESOP permit (127-5229-00040)
- (2) Hcl emissions are from pickling line only
- (3) Controlled emissions from the scale breaker and pickling line are based on the limits that source is willing to take in order to comply with 326 IAC 2-8-4 (FESOP)