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Mayor

**DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**CITY OF HAMMOND**

RONALD L. NOVAK  
Director

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
-AIR POLLUTION CONTROL DIVISION-**

**Halstab Division of Hammond Group, Inc.  
3100 Michigan Street  
Hammond, Indiana 46323**

(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.

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR 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 No.: <b>F089-14167-00218</b>	
Issued by: Original Signed by: Ronald L. Novak, Director Hammond Department of Environmental Management	Issuance Date: <u>June 16, 2005</u> Expiration Date: <u>June 16, 2010</u>

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

D.1.7 Visible Emissions Notations  
D.1.8 Parametric Monitoring  
D.1.9 Baghouse and HEPA Filter Inspections  
D.1.10 Broken or Failed Bag Detection

**Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

D.1.11 Record Keeping Requirements

**SECTION D.2 FACILITY OPERATION CONDITIONS**

Stack ID S-12: Material Dump Station

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

D.2.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1]  
[326 IAC 2-8-4]

- D.2.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]
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- D.2.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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

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

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- D.3.4 Particulate Matter less than 10 microns in diameter (PM10)
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**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

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Stack ID S-17: Bulk/Bag Packaging System, Mixed Metals System, and Two (2) Portable Packing Stations

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

- D.5.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4]
- D.5.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
- D.5.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.5.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]
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- D.5.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- D.5.10 Broken or Failed Bag Detection

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Stack ID S-3: Acid Dispersion System

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

- D.6.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6-1]
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**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

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[326 IAC 2-8-4]
- D.7.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
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**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.8.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1]  
[326 IAC 2-8-4]
- D.8.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
- D.8.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.8.4 Particulate Matter less than 10 microns in diameter (PM10)
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**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

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**Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

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

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[326 IAC 2-8-4]
- D.9.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

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

D.10.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)]  
[326 IAC 6-1]

D.10.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC  
Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]

D.10.3 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]

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

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[326 IAC 6-1]

D.11.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC  
Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]

D.11.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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[326 IAC 2-8-4]

D.12.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]

D.12.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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- D.12.4 Particulate Matter less than 10 microns in diameter (PM10)
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**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

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Stack ID S-2: Dispersion System

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

- D.13.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1]  
[326 IAC 2-8-4]
- D.13.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
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**Compliance Determination Requirements**

- D.13.4 Particulate Matter less than 10 microns in diameter (PM10)
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**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

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- D.13.7 Parametric Monitoring
- D.13.8 Baghouse and HEPA Filter Inspections
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**Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

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**SECTION D.14 FACILITY OPERATION CONDITIONS – TRIVIAL ACTIVITY**

Stack IDs S-9, S-10, and S-11: Product Handling Systems No. 1, 2, & 3

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

- D.14.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1]  
[326 IAC 2-8-4]
- D.14.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
- D.14.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.14.4 Particulate Matter less than 10 microns in diameter (PM10)
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**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- D.14.6 Visible Emissions Notations
- D.14.7 Parametric Monitoring
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Stack ID S-13: Material Handling System

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

D.15.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1]  
[326 IAC 2-8-4]

D.15.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]

D.15.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

D.15.4 Particulate Matter less than 10 microns in diameter (PM10)

D.15.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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

D.15.6 Visible Emissions Notations

D.15.7 Parametric Monitoring

D.15.8 Baghouse and HEPA Filter Inspections

D.15.9 Broken or Failed Bag Detection

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D.15.10 Record Keeping Requirements

**SECTION D.16 FACILITY OPERATION CONDITIONS – TRIVIAL ACTIVITY**

Stack ID S-16: Blended Product Handling System

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

D.16.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1]  
[326 IAC 2-8-4]

D.16.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]

D.16.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

D.16.4 Particulate Matter less than 10 microns in diameter (PM10)

D.16.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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

D.16.6 Visible Emissions Notations

D.16.7 Parametric Monitoring

D.16.8 Baghouse and HEPA Filter Inspections

D.16.9 Broken or Failed Bag Detection

**Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

D.16.10 Record Keeping Requirements

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Stack ID S-20: Central Vacuum System/No. 1 Dryer Vacuum System

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

D.17.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)]  
[326 IAC 6-1]

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- D.17.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]
  - D.17.3 Lead (Pb) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]
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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) and the Hammond Department of Environmental Management (HDEM). 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 Industrial Inorganic and Organic Chemicals Manufacturing Plant.

Authorized Individual:	Environmental Coordinator
Source Address:	3100 Michigan Street, Hammond, Indiana 46323
Mailing Address:	1414 Field Street, P.O. Box 6408 Hammond, Indiana 46325-6408
General Source Phone:	(219) 931-9360
SIC Code:	2819 – Industrial Inorganic Chemicals, nec 2869 – Industrial Organic Chemicals, nec
Source Location Status:	Lake County Attainment/Unclassifiable for PM10, CO, NO <sub>2</sub> and Lead, Primary Nonattainment for SO <sub>2</sub> and PM2.5, Nonattainment for ozone under the 8-hour standard, and Nonattainment for ozone under the 1-hour standard
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source under PSD Rules; Minor Source under Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act <u>Not 1 of 28 Source Categories</u>

### 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:

Note: Bin vent filters and bag filters located at Halstab are the same as or equivalent to baghouses. All of the baghouses are the reverse jet air pulse type and contain filter bags supported by wire cages.

#### (a) Stack ID S-6: Mill Line No. 1

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper.

Emissions units associated with Stack ID S-6 were installed in November, 1981.

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Emissions from this system are controlled by a bag filter (No. 209) followed by a HEPA filter.

(b) Stack ID S-7: Mill Line No. 2

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-7 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 236) followed by a HEPA filter.

(c) Stack ID S-8: Mill Line No. 3

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-8 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 247) followed by a HEPA filter.

(d) Stack ID S-12: Material Dump Station

Bags of material are dumped into a bulk / bagged material dump station.

Emissions units associated with Stack ID S-12 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 506) followed by a HEPA filter.

(e) Stack ID S-14: Blend Scale Hopper

Material is conveyed from the material handling system and product handling systems to a surge hopper, weighed through a Blend Scale Hopper, and then fed into a blender or to a Bulk/Bag Packaging System.

Emissions units associated with Stack ID S-14 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 455) followed by a HEPA filter.

(f) Stack ID S-15: Blender

Material from the Blend Scale Hopper is fed to a Blend Product Hopper, blended, and then sent to a Blended Product Storage Hopper.

Emissions units associated with Stack ID S-15 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 301) followed by a HEPA unit.

(g) Stack ID S-17: Bulk/Bag Packaging System, Mixed Metals System, and Two (2) Portable Packing Stations

Unit ID: S-17-1: Bulk/Bag Packaging System

Product is loaded into either bulk containers or consumable bags for shipment.

Emissions units associated with Stack ID S-17 were installed in November, 1981.

Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

Unit ID: S-17-2: Mixed Metals System

Products are fed into a dump station and transferred to a blender. The blender discharges to a pneumatic conveying line which transfers the blended product to a surge hopper which feeds the bulk/bag packaging stations. The surge hopper can also receive product directly from the Blended Product Handling System for packaging.

Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

Unit ID: S-17-3: Two (2) Portable Packing Stations

Products from a portable tote bin are packaged in bags for shipment.

Emissions from each station are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

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) Stack ID S-3: Acid Dispersion System

Acid is poured into a dispersion tank where water is added.

Emissions units associated with Stack ID S-3 were installed in November, 1981.

There are no emission controls on this unit.

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(b) Stack ID S-4: No. 1 Dryer

Reacted compound is conveyed to the dryer to evaporate off water.

Emissions units associated with Stack ID S-4 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 204) followed by a HEPA filter.

(c) Stack ID S-5: Dryer No. 1 Containment System

This stack services the Dryer No. 1 containment system and rework unloading station. The containment system encloses the No. 1 Dryer and captures fugitive emissions in order to reduce employee exposure. The rework unloading station is used to feed rework material to the dryer discharge.

Emissions units associated with Stack ID S-5 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 226) followed by a HEPA filter.

(d) Stack ID S-18: Boiler No. 1

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

(e) Stack ID S-19: Boiler No. 2

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

(f) Stack ID S-21: Dryer No. 3

Reacted compound is conveyed into a drying chamber to evaporate off water. The dried product is separated from the air stream in a product recovery baghouse.

Emissions units associated with Stack ID S-21 were installed in October, 1996.

Emissions from this system are controlled by a product recovery baghouse (No. 805) and a HEPA filter.

(g) Stack ID S-22: Dryer No. 4

Reacted compound is conveyed into a drying chamber. The dried product is separated from the air stream in a product recovery baghouse and packed out in bags.

Emission units associated with Stack ID S-22 were installed in June, 2002.

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There are no emission controls on this unit.

- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (i) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (j) Combustion source flame safety purging on startup.
- (k) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (l) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (m) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (n) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (o) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 °F) or;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 °C (68 °F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (p) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (q) Closed loop heating and cooling systems.
- (r) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 % by volume.
- (s) Any operation using aqueous solutions containing less than 1 % by weight of VOCs excluding HAPs.
- (t) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (u) Replacement or repair of bags or baghouses and filters in other air filtration equipment.
- (v) Heat exchanger cleaning and repair.
- (w) Process vessel degassing and cleaning to prepare for internal repairs.
- (x) Paved and unpaved roads and packing lots with public access. [326 IAC 6-4]

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- (y) Conveyors as follows:
    - 1) Underground conveyors.
  - (z) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
  - (aa) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
  - (bb) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.
  - (cc) On-site fire and emergency response training approved by the department.
  - (dd) Purge double block and bleed valves.
  - (ee) Filter or coalescer media changeout.
  - (ff) A laboratory as defined in 326 IAC 2-7-1(21)(D).
  - (gg) Research and development activities as defined in 326 IAC 2-7-1(21)(E).

### Trivial Activities

The source also consists of the following trivial activities, as defined in 326 IAC 2-7-1(40):

- (a) Stack ID S-1: Feedstock Handling System

Feedstock is pneumatically conveyed from bulk delivery trucks to a storage hopper, a weigh hopper and finally fed to a dispersion system.

Emissions units associated with Stack ID S-1 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 121) followed by a HEPA filter.
- (b) Stack ID S-2: Dispersion System

Feedstock is fed to a dispersion tank where it is mixed with water and acid and then fed to a reactor.

Emissions units associated with Stack ID S-2 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 115) followed by a HEPA filter.

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(c) Stack ID S-9: Product Handling System No. 1

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-9 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 317) followed by a HEPA filter.

(d) Stack ID S-10: Product Handling System No. 2

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-10 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 318) followed by a HEPA filter.

(e) Stack ID S-11: Product Handling System No. 3

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-11 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 319) followed by a HEPA filter.

(f) Stack ID S-13: Material Handling System

Material is pneumatically conveyed from the dump station to one of three hoppers.

Emissions units associated with Stack ID S-13 were installed in November, 1981.

Emissions from this system are controlled by bin vent filters (No. 653, 654, & 655) and a HEPA filter.

(g) Stack ID S-16: Blended Product Handling System

Blended product is pneumatically conveyed from the blender to one of three hoppers to await packaging.

Emissions units associated with Stack ID S-16 were installed in November, 1981.

Emissions from this system are controlled by bin vent filters (No. 650, 651, & 652) and a HEPA filter.

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(h) Stack ID S-20: Central Vacuum System/No. 1 Dryer Vacuum System

The Central Vacuum System is used for general housekeeping throughout the plant.

Emission units associated with Stack S-20 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 447).

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) and the Hammond Department of Environmental Management (HDEM) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

## 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 meaning 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)] [326 IAC 2-1.1-9.5]  
This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.
- B.4 Enforceability [326 IAC 2-8-6]  
(a) 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, HDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.  
(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by HDEM.
- 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 Provide Information [326 IAC 2-8-4(5)(E)]  
(a) The Permittee shall furnish to IDEM, OAQ and HDEM within a reasonable time, any information that IDEM, OAQ and HDEM 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 and HDEM copies of records required to be kept by this permit.  
(b) For information furnished by the Permittee to IDEM, OAQ and HDEM, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing

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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 and HDEM 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 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).
- B.11 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. All 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<sup>th</sup> of each year to:
- Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- and
- Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320
- (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 and HDEM 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 and HDEM 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.12 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 Preventive Maintenance Plans (PMPs), 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, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and HDEM. IDEM, OAQ and HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.13 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;

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- (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 and HDEM 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

and

HDEM:  
Telephone No.: 219-853-6306  
Facsimile No.: 219-853-6343

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

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

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

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

B.14 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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "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.

**B.15 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 or HDEM 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 or HDEM 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 or HDEM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or HDEM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 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 HDEM 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:

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

and to:

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

(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 and HDEM on or before the date it is due.

(2) If IDEM, OAQ and HDEM 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 and HDEM 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 and HDEM, any additional information identified as being needed to process the application.

B.17 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  
Indianapolis, Indiana 46204-2251

and to:

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Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

Any such application shall 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. A basic filing fee of one hundred dollars (\$100) shall be submitted with any request for an administrative amendment submitted to HDEM for review. [326 IAC 2-8-10(b)(3)] [326 IAC 2-1.1-10(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 2-8-11.1]

(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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

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 and HDEM in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **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).
- (c) **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.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.19 Permit Revision Requirement** [326 IAC 2-8-11.1]

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

**B.20 Inspection and Entry** [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, HDEM, 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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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B.21 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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

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 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

## 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) 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.

(c) 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 twenty percent (20%) 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.

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- 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.
- 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).
- C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]  
The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).
- C.7 Lake County Particulate Matter Contingency Measures [326 IAC 6-1-11.2]  
The Permittee shall comply with the applicable provisions of 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures).
- C.8 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.9 Stack Height [326 IAC 1-7]  
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- C.10 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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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 14-10-1, 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) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

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

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

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 and HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and HDEM if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

#### **C.13 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

#### **C.14 Continuous Compliance Plan [326 IAC 6-1-10.1(l)]**

Pursuant to 326 IAC 6-1-10.1(l) (Lake County PM10 Emission Requirements), the Permittee shall submit to IDEM, OAQ and HDEM, and maintain at the source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the inspections, monitoring, and record keeping requirements as specified in 326 IAC 6-1-10.1(p) through (r) or according to the Permittee’s CCP.

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- C.15 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]  
Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.
- C.16 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) 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.17 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]  
If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.
- C.18 Compliance Response Plan – Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]
- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ and HDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SSM Plan) shall be submitted within the time frames specified by the applicable 40 CFR 60/63 requirement.

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- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan); or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for 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) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B – Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.19 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 response action documents submitted pursuant to this condition do 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.20 Emission Reporting [326 IAC 2-8-4(3)] [Hammond Ordinance No. 7102]

- (a) The Permittee shall submit an annual emission inventory containing production information, fuel usage and estimated actual emissions of criteria pollutants. The emission inventory must be received by April 15<sup>th</sup> of each year. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. This is a local requirement only. The emission inventory must be submitted to:

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

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

- (b) The emission inventory 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

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any other means, it shall be considered timely if received by HDEM on or before the date it is due.

C.21 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM with 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.22 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee 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 IAC 2-1.1-1(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  
Indianapolis, Indiana 46204-2251

and to:

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

- (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, and HDEM on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## **Stratospheric Ozone Protection**

### **C.23 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 2-8-4(10)]:

#### **Stack ID S-6: Mill Line No. 1**

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper.

Emissions units associated with Stack ID S-6 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 209) followed by a HEPA filter.

#### **Stack ID S-7: Mill Line No. 2**

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-7 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 236) followed by a HEPA filter.

#### **Stack ID S-8: Mill Line No. 3**

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-8 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 247) followed by a HEPA filter.

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

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

- D.1.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4] Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from Stack IDs S-6, S-7, & S-8, as specifically listed in subsection (d), shall be limited to 0.022 gr/dscf and 0.570 lbs/hr, per stack, which is equivalent to 2.497 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

- D.1.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]  
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack IDs S-6, S-7, & S-8, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.05 lbs/hr, per stack, which is equivalent to 0.22 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.1.3 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 any control devices.

### **Compliance Determination Requirements**

- D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]  
During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.1.2, the Permittee shall perform Pb testing on Stack ID S-7 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.1.5 Particulate Matter less than 10 microns in diameter (PM10)  
In order to comply with Condition D.1.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.1.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]  
In order to comply with Condition D.1.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

- D.1.7 Visible Emissions Notations
- (a) Visible emission notations of the Stack IDs S-6, S-7, & S-8 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
  - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack IDs S-6, S-7, & S-8, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

*(Stack ID S-6)*

Bag Filter No. 209: 0.1 – 10 inches of water

HEPA: 0.1 – 10 inches of water

*(Stack ID S-7)*

Bag Filter No. 236: 0.1 – 5 inches of water

HEPA: 0.1 – 10 inches of water

*(Stack ID S-8)*

Bag Filter No. 247: 0.1 – 10 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.1.9 Baghouse and HEPA Filter Inspections

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack IDs S-6, S-7, & S-8 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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

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Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.1.11 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the Stack IDs S-6, S-7, & S-8 stack exhaust once per day.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9 and the dates the vents are redirected.
- (d) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

#### **Stack ID S-12: Material Dump Station**

Bags of material are dumped into a bulk / bagged material dump station.

Emissions units associated with Stack ID S-12 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 506) followed by a HEPA filter.

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

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

- D.2.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4]  
Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-12, as specifically listed in section (d), shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.2.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]  
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-12, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.2.3 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 any control devices.

### Compliance Determination Requirements

- D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]  
During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.2.2, the Permittee shall perform Pb testing on Stack ID S-12 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.2.5 Particulate Matter less than 10 microns in diameter (PM10)  
In order to comply with Condition D.2.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.2.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

In order to comply with Condition D.2.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.2.7 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-12 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.2.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-12, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-12)  
Bag Filter No. 506: 0.1 – 5 inches of water  
HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

**D.2.9 Baghouse and HEPA Filter Inspections**

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-12 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

**D.2.10 Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.2.11 Record Keeping Requirements**

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-12 stack exhaust once per day.
- (b) To document compliance with Condition D.2.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9 and the dates the vents are redirected.
- (d) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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- (e) 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)]:

#### **Stack ID S-14: Blend Scale Hopper**

Material is conveyed from the material handling system and product handling systems to a surge hopper, weighed through a Blend Scale Hopper, and then fed into a blender or to a Bulk/Bag Packaging System.

Emissions units associated with Stack ID S-14 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 455) followed by a HEPA filter.

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

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

- D.3.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4]  
Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-14, as specifically listed in subsection (d), shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.3.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]  
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-14, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.3.3 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 any control devices.

### Compliance Determination Requirements

- D.3.4 Particulate Matter less than 10 microns in diameter (PM10)  
In order to comply with Condition D.3.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.3.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]  
In order to comply with Condition D.3.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

### **D.3.6 Visible Emissions Notations**

- (a) Visible emission notations of the Stack ID S-14 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **D.3.7 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-14, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

*(Stack ID S-14)*

Bag Filter No. 455: 0.1 – 5 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

### **D.3.8 Baghouse and HEPA Filter Inspections**

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-14 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.3.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.3.10 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-14 stack exhaust once per day.
- (b) To document compliance with Condition D.3.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.3.8, the Permittee shall maintain records of the results of the inspections required under Condition D.3.8 and the dates the vents are redirected.
- (d) To document compliance with Condition D.3.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) 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)]:

#### **Stack ID S-15: Blender**

Material from the Blend Scale Hopper is fed to a Blend Product Hopper, blended, and then sent to a Blended Product Storage Hopper.

Emissions units associated with Stack ID S-15 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 301) followed by a HEPA unit.

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

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

- D.4.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4] Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-15, as specifically listed in subsection (d), shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.4.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4] Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-15, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.4.3 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 any control devices.

### Compliance Determination Requirements

- D.4.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11] During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.4.2, the Permittee shall perform Pb testing on Stack ID S-15 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.4.5 Particulate Matter less than 10 microns in diameter (PM10) In order to comply with Condition D.4.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.4.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

In order to comply with Condition D.4.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.4.7 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-15 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.4.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-15, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-15)  
Bag Filter No. 301: 0.1 – 5 inches of water  
HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

**D.4.9 Baghouse and HEPA Filter Inspections**

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-15 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

**D.4.10 Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.4.11 Record Keeping Requirements**

- (a) To document compliance with Condition D.4.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-15 stack exhaust once per day.
- (b) To document compliance with Condition D.4.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.4.9, the Permittee shall maintain records of the results of the inspections required under Condition D.4.9 and the dates the vents are redirected.
- (d) To document compliance with Condition D.4.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

## SECTION D.5 FACILITY OPERATION CONDITIONS

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

#### ***Stack ID S-17: Bulk/Bag Packaging System, Mixed Metals System, and Two (2) Portable Packing Stations***

##### *Unit ID: S-17-1: Bulk/Bag Packaging System*

Product is loaded into either bulk containers or consumable bags for shipment.

Emissions units associated with Stack ID S-17 were installed in November, 1981.

Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

##### *Unit ID: S-17-2: Mixed Metals System*

Products are fed into a dump station and transferred to a blender. The blender discharges to a pneumatic conveying line which transfers the blended product to a surge hopper which feeds the bulk/bag packaging stations. The surge hopper can also receive product directly from the Blended Product Handling System for packaging.

Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

##### *Unit ID: S-17-3: Two (2) Portable Packing Stations*

Products from a portable tote bin are packaged in bags for shipment.

Emissions from each station are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

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

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

- D.5.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4] Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-17, as specifically listed in subsection (d), shall be limited to 0.022 gr/dscf and 1.990 lbs/hr which is equivalent to 8.716 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.5.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4] Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-17, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.07 lbs/hr which is equivalent to 0.31 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

**D.5.3 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 any control devices.

**Compliance Determination Requirements**

**D.5.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]**

During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.5.2, the Permittee shall perform Pb testing on Stack S-17 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.5.5 Particulate Matter less than 10 microns in diameter (PM10)**

In order to comply with Condition D.5.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

**D.5.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]**

In order to comply with Condition D.5.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

**D.5.7 Visible Emissions Notations**

- (a) Visible emission notations of the Stack ID S-17 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.5.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-17, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

*(Stack ID S-17)*

Exhaust Bag Filter No. 430: 0.1 - 5

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.5.9 Baghouse and HEPA Filter Inspections

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-17 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.5.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been

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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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.5.11 Record Keeping Requirements**

- (a) To document compliance with Condition D.5.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-17 stack exhaust once per day.
- (b) To document compliance with Condition D.5.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.5.9, the Permittee shall maintain records of the results of the inspections required under Condition D.5.9 and the dates the vents are redirected.
- (d) To document compliance with Condition D.5.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.6 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

#### **Stack ID S-3: Acid Dispersion System**

Dry acid is poured into a dispersion tank where water is added.

Emissions units associated with Stack ID S-3 were installed in November, 1981.

There are no emission controls on this unit.

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

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

- D.6.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6-1]  
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Stack ID S-3 shall be limited to 1.000 lb/hr which is equivalent to 4.380 tons/yr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 6-1 do not apply.
- D.6.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]  
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM10 emissions from Stack ID S-3 shall be limited to 1.000 lb/hr which is equivalent to 4.380 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.6.3 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 any control devices.

### Compliance Determination Requirements

- D.6.4 Visible Emissions Notations
- (a) Visible emission notations of the Stack ID S-3 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
  - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

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- (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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.6.5 Record Keeping Requirements**

- (a) To document compliance with Condition D.6.4, the Permittee shall maintain records of visible emission notations of the Stack ID S-3 exhaust once per day.
- (b) To document compliance with Condition D.6.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.7 FACILITY OPERATION CONDITIONS – INSIGNIFICANT ACTIVITY

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

#### **Stack ID S-4: No. 1 Dryer**

Reacted compound is conveyed to the dryer to evaporate off water.

Emissions units associated with Stack ID S-4 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 204) followed by a HEPA filter.

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

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

- D.7.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4]  
Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-4, as specifically listed in subsection (d), shall be limited to 0.022 gr/dscf and 1.460 lbs/hr which is equivalent to 6.395 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.7.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]  
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-4, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.07 lbs/hr which is equivalent to 0.31 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.7.3 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 any control devices.

### Compliance Determination Requirements

- D.7.4 Particulate Matter less than 10 microns in diameter (PM10)  
In order to comply with Condition D.7.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.7.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]  
In order to comply with Condition D.7.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

### **D.7.6 Visible Emissions Notations**

- (a) Visible emission notations of the Stack ID S-4 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **D.7.7 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-4, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

*(Stack ID S-4)*

Bag Filter No. 204: 0.1 – 5 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

### **D.7.8 Baghouse and HEPA Filter Inspections**

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-4 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

**D.7.9 Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.7.10 Record Keeping Requirements**

- (a) To document compliance with Condition D.7.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-4 stack exhaust once per day.
- (b) To document compliance with Condition D.7.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.7.8, the Permittee shall maintain records of the results of the inspections required under Condition D.7.8 and the dates the vents are redirected.
- (d) To document compliance with Condition D.7.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.8 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

#### **Stack ID S-5: Dryer No. 1 Containment System**

This stack services the Dryer No. 1 containment system and rework unloading station. The containment system encloses the No. 1 Dryer and captures fugitive emissions in order to reduce employee exposure. The rework unloading station is used to feed rework material to the dryer discharge.

Emissions units associated with Stack ID S-5 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 226) followed by a HEPA filter.

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

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

- D.8.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4]  
Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-5, as specifically listed in subsection (d), shall be limited to 0.022 gr/dscf and 1.030 lbs/hr which is equivalent to 4.511 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.8.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]  
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-5, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.07 lbs/hr which is equivalent to 0.31 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.8.3 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 any control devices.

### Compliance Determination Requirements

- D.8.4 Particulate Matter less than 10 microns in diameter (PM10)  
In order to comply with Condition D.8.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.8.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]  
In order to comply with Condition D.8.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

### **D.8.6 Visible Emissions Notations**

- (a) Visible emission notations of the Stack ID S-5 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **D.8.7 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-5, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

*(Stack ID S-5)*

Bag Filter No. 226: 0.1 – 10 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

### **D.8.8 Baghouse and HEPA Filter Inspections**

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-5 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

**D.8.9 Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.8.10 Record Keeping Requirements**

- (a) To document compliance with Condition D.8.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-5 stack exhaust once per day.
- (b) To document compliance with Condition D.8.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.8.8, the Permittee shall maintain records of the results of the inspections required under Condition D.8.8 and the dates the vents are redirected.
- (d) To document compliance with Condition D.8.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.9 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

#### **Stack ID S-18: Boiler No. 1**

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

#### **Stack ID S-19: Boiler No. 2**

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

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

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

- D.9.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1][326 IAC 2-8-4]  
Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions for Stack IDs S-18 and S-19 shall be limited to 0.003 lbs/MMBtu and 0.008 lbs/hr, per stack, as specifically listed in 326 IAC 6-1-10.1(h) and shall fire natural gas only.
- D.9.2 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 any control devices.

### Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.9.3 Record Keeping Requirements
- (a) To document compliance with Condition D.9.1, the Permittee shall maintain monthly records of the fuel usage for each boiler. These records shall be made available upon request by HDEM or IDEM, OAQ.
  - (b) To document compliance with Condition D.9.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
  - (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.10 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

#### **Stack ID S-21: Dryer No. 3**

Reacted compound is conveyed into a drying chamber to evaporate off water. The dried product is separated from the air stream in a product recovery baghouse.

Emissions units associated with Stack ID S-21 were installed in October, 1996.

Emissions from this system are controlled by a product recovery baghouse (No. 805) and a HEPA filter.

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

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

- D.10.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6-1]  
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Stack ID S-21 shall be limited to 2.497 lbs/hr which is equivalent to 10.935 tons/yr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 6-1 do not apply.
- D.10.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]  
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM10 emissions from Stack ID S-21 shall be limited to 2.497 lbs/hr which is equivalent to 10.935 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.10.3 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]  
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-21, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.07 lbs/hr which is equivalent to 0.31 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.10.4 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 any control devices.

### Compliance Determination Requirements

- D.10.5 Particulate Matter less than 10 microns in diameter (PM10)  
In order to comply with Condition D.10.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.10.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

In order to comply with Condition D.10.3, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.10.7 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-21 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.10.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-21, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

*(Stack ID S-21)*

Baghouse: 0.1 – 10 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.10.9 Baghouse and HEPA Filter Inspections

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-21 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.10.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

D.10.11 Record Keeping Requirements

- (a) To document compliance with Condition D.10.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-21 stack exhaust once per day.
- (b) To document compliance with Condition D.10.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.10.9, the Permittee shall maintain records of the results of the inspections required under Condition D.10.9 and the dates the vents are redirected.
- (d) To document compliance with Condition D.10.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

## SECTION D.11 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

#### **Stack ID S-22: Dryer No. 4**

Reacted compound is conveyed into a drying chamber. The dried product is separated from the air stream in a product recovery baghouse and packed out in bags.

Emissions units associated with Stack ID S-22 were installed in June, 2002.

There are no emission controls on this unit.

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

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

- D.11.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6-1]  
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Stack ID S-22 shall be limited to 0.359 lbs/hr which is equivalent to 1.572 tons/yr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 6-1 do not apply.
- D.11.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]  
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM10 emissions from Stack ID S-22 shall be limited to 0.359 lbs/hr which is equivalent to 1.572 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.11.3 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 any control devices.

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

- D.11.4 Visible Emissions Notations
- (a) Visible emission notations of the Stack ID S-22 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

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- (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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.11.5 Record Keeping Requirements**

- (a) To document compliance with Condition D.11.4, the Permittee shall maintain records of visible emission notations of the Stack ID S-22 stack exhaust once per day.
- (b) To document compliance with Condition D.11.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.12 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

#### **Stack ID S-1: Feedstock Handling System**

Feedstock is pneumatically conveyed from bulk delivery trucks to a storage hopper, a weigh hopper and finally fed to a dispersion system.

Emissions units associated with Stack ID S-1 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 121) followed by a HEPA filter.

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

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

D.12.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4]  
Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-1, as specifically listed in subsection (d), shall be limited to 0.022 gr/dscf and 0.220 lbs/hr which is equivalent to 0.964 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.12.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]  
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-1, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.12.3 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 any control devices.

### Compliance Determination Requirements

D.12.4 Particulate Matter less than 10 microns in diameter (PM10)  
In order to comply with Condition D.12.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.12.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]  
In order to comply with Condition D.12.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

### **D.12.6 Visible Emissions Notations**

- (a) Visible emission notations of the Stack ID S-1 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **D.12.7 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-1, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

*(Stack ID S-1)*

Bin Vent Filter No. 121: 0.1 – 10 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

### **D.12.8 Baghouse and HEPA Filter Inspections**

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-1 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.12.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.12.10 Record Keeping Requirements

- (a) To document compliance with Condition D.12.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-1 stack exhaust once per day.
- (b) To document compliance with Condition D.12.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.12.8, the Permittee shall maintain records of the results of the inspections required under Condition D.12.8 and the dates the vents are redirected.
- (d) To document compliance with Condition D.12.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.13 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

#### **Stack ID S-2: Dispersion System**

Feedstock is fed to a dispersion tank where it is mixed with water and acid and then fed to a reactor.

Emissions units associated with Stack ID S-2 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 115) followed by a HEPA filter.

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

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

- D.13.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4]  
Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-2, as specifically listed in subsection (d), shall be limited to 0.022 gr/dscf and 0.080 lbs/hr which is equivalent to 0.350 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.13.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]  
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-2, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.03 lbs/hr which is equivalent to 0.13 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.13.3 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 any control devices.

### Compliance Determination Requirements

- D.13.4 Particulate Matter less than 10 microns in diameter (PM10)  
In order to comply with Condition D.13.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.13.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]  
In order to comply with Condition D.13.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

### **D.13.6 Visible Emissions Notations**

- (a) Visible emission notations of the Stack ID S-2 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **D.13.7 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-2, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of the following:

*(Stack ID S-2)*

Bag Filter No. 115: 0.1 – 10 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

### **D.13.8 Baghouse and HEPA Filter Inspections**

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-2 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.13.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.13.10 Record Keeping Requirements

- (a) To document compliance with Condition D.13.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-2 stack exhaust once per day.
- (b) To document compliance with Condition D.13.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.13.8, the Permittee shall maintain records of the results of the inspections required under Condition D.13.8 and the dates the vents are redirected.
- (d) To document compliance with Condition D.13.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.14 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

#### **Stack ID S-9: Product Handling System No. 1**

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-9 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 317) followed by a HEPA filter.

#### **Stack ID S-10: Product Handling System No. 2**

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-10 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 318) followed by a HEPA filter.

#### **Stack ID S-11: Product Handling System No. 3**

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-11 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 319) followed by a HEPA filter.

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

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

- D.14.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4]  
Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from Stack IDs S-9, S-10, & S-11, as specifically listed in section (d), shall be limited to 0.022 gr/dscf and 0.200 lbs/hr, per stack, which is equivalent to 0.876 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.14.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]  
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack IDs S-9, S-10, & S-11, as specifically listed in 326 IAC 15-1-2(a)(7) shall be limited to 0.04 lbs/hr, per stack, which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.14.3 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 any control devices.

### Compliance Determination Requirements

D.14.4 Particulate Matter less than 10 microns in diameter (PM10)

In order to comply with Condition D.14.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.14.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

In order to comply with Condition 14.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.14.6 Visible Emissions Notations

- (a) Visible emission notations of the Stack IDs S-9, S-10, & S-11 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.14.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack IDs S-9, S-10, & S-11, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

*(Stack ID S-9)*

Bin Vent Filter No. 317: 0.1 – 5 inches of water  
HEPA: 0.1 – 10 inches of water

*(Stack ID S-10)*

Bin Vent Filter No. 318: 0.1 – 5 inches of water  
HEPA: 0.1 – 10 inches of water

*(Stack ID S-11)*

Bin Vent Filter No. 319: 0.1 – 10 inches of water  
HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.14.8 Baghouse and HEPA Filter Inspections

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack IDs S-9, S-10, & S-11 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.14.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units

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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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### D.14.10 Record Keeping Requirements

- (a) To document compliance with Condition D.14.6, the Permittee shall maintain records of visible emission notations of the Stack IDs S-9, S-10, & S-11 stack exhaust once per day.
- (b) To document compliance with Condition D.14.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.14.8, the Permittee shall maintain records of the results of the inspections required under Condition D.14.8 and the dates the vents are redirected.
- (d) To document compliance with Condition D.14.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.15 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

#### **Stack ID S-13: Material Handling System**

Material is pneumatically conveyed from the dump station to one of three hoppers.

Emissions units associated with Stack ID S-13 were installed in November, 1981.

Emissions from this system are controlled by bin vent filters (No. 653, 654, & 655) and a HEPA filter.

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

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

- D.15.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4]  
Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-13, as specifically listed in subsection (d), shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.15.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]  
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-13, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.15.3 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 any control devices.

### Compliance Determination Requirements

- D.15.4 Particulate Matter less than 10 microns in diameter (PM10)  
In order to comply with Condition D.15.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.15.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]  
In order to comply with Condition D.15.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

### **D.15.6 Visible Emissions Notations**

- (a) Visible emission notations of the Stack ID S-13 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **D.15.7 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-13, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

*(Stack ID S-13)*

Bin Vent Filter No. 653: 0.1 – 5 inches of water  
Bin Vent Filter No. 654: 0.1 – 5 inches of water  
Bin Vent Filter No. 655: 0.1 – 10 inches of water  
HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

### **D.15.8 Baghouse and HEPA Filter Inspections**

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-13 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

**D.15.9 Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.15.10 Record Keeping Requirements**

- (a) To document compliance with Condition D.15.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-13 stack exhaust once per day.
- (b) To document compliance with Condition D.15.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.15.8, the Permittee shall maintain records of the results of the inspections required under Condition D.15.8 and the dates the vents are redirected.
- (d) To document compliance with Condition D.15.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.16 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

#### **Stack ID S-16: Blended Product Handling System**

Blended product is pneumatically conveyed from the blender to one of three hoppers to await packaging.

Emissions units associated with Stack ID S-16 were installed in November, 1981.

Emissions from this system are controlled by bin vent filters (No. 650, 651, & 652) and a HEPA filter.

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

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

- D.16.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1] [326 IAC 2-8-4]  
Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-16, as specifically listed in subsection (d), shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.16.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]  
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-16, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.16.3 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 any control devices.

### Compliance Determination Requirements

- D.16.4 Particulate Matter less than 10 microns in diameter (PM10)  
In order to comply with Condition D.16.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.16.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]  
In order to comply with Condition D.16.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

### **D.16.6 Visible Emissions Notations**

- (a) Visible emission notations of the Stack ID S-16 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **D.16.7 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-16, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

*(Stack ID S-16)*

Bin Vent Filter No. 650: 0.1 – 10 inches of water  
Bin Vent Filter No. 651: 0.1 – 10 inches of water  
Bin Vent Filter No. 652: 0.1 – 10 inches of water  
HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

### **D.16.8 Baghouse and HEPA Filter Inspections**

An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-16 when venting to the atmosphere. A baghouse 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

**D.16.9 Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.16.10 Record Keeping Requirements**

- (a) To document compliance with Condition D.16.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-16 stack exhaust once per day.
- (b) To document compliance with Condition D.16.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.16.8, the Permittee shall maintain records of the results of the inspections required under Condition D.16.8 and the dates the vents are redirected.
- (d) To document compliance with Condition D.16.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

## SECTION D.17 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

#### **Stack ID S-20: Central Vacuum System/No. 1 Dryer Vacuum System**

The Central Vacuum System is used for general housekeeping throughout the plant.

Emissions units associated with Stack ID S-20 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 447).

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

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

- D.17.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6-1]  
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Stack ID S-20 shall be limited to 0.029 lb/hr which is equivalent to 0.127 tons/yr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 6-1 do not apply.
- D.17.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]  
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM10 emissions from Stack ID S-20 shall be limited to 0.029 lb/hr which is equivalent to 0.127 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.17.3 Lead (Pb) [Hammond AQC Ordinance No. 3522 (as amended)]  
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the Pb emissions from Stack S-20 shall be limited to 0.024 lbs/hr which is equivalent to 0.105 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.17.4 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 any control devices.

### Compliance Determination Requirements

- D.17.5 Visible Emissions Notations
- (a) Visible emission notations of the Stack ID S-20 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- 
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
  - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
  - (e) 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.17.6 Record Keeping Requirements**

- (a) To document compliance with Condition D.17.5, the Permittee shall maintain records of visible emission notations of the Stack ID S-20 exhaust once per day.
- (b) To document compliance with Condition D.17.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) 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  
and  
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
-AIR POLLUTION CONTROL DIVISION-  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: **Halstab Division of Hammond Group, Inc.**  
Source Address: 3100 Michigan Street, Hammond, Indiana 46323  
Mailing Address: 1414 Field Street, P.O. Box 6408, Hammond, Indiana 46325-6408  
FESOP No.: **F089-14167-00218**

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

Please check what document is being certified:

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

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-5674  
Fax: 317-233-5967**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
AIR POLLUTION CONTROL DIVISION  
5925 CALUMET AVENUE  
HAMMOND, INDIANA 46320**

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

Source Name: **Halstab Division of Hammond Group, Inc.**  
Source Address: 3100 Michigan Street, Hammond, Indiana 46323  
Mailing Address: 1414 Field Street, P.O. Box 6408, Hammond, Indiana 46325-6408  
FESOP No.: **F089-14167-00218**

**This form consists of 2 pages**

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     This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM), within four (4) business hours (1- 800-451-6027 or 317-233-5674, ask for IDEM Compliance Section) and (219-853-6306, for HDEM); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967, IDEM and 219-853-6343, HDEM), 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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
AIR POLLUTION CONTROL DIVISION**

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

Source Name: **Halstab Division of Hammond Group, Inc.**  
Source Address: 3100 Michigan Street, Hammond, Indiana 46323  
Mailing Address: 1414 Field Street, P.O. Box 6408, Hammond, Indiana 46325-6408  
FESOP No.: **F089-14167-00218**

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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".

<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Hammond Department of Environmental Management  
- Air Pollution Control Division-**

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

**Source Background and Description**

**Source Name:** Halstab Division of Hammond Group, Inc.  
**Source Location:** 3100 Michigan Street, Hammond, Indiana 46323  
**County:** Lake  
**SIC Code:** 2819 – Industrial Inorganic Chemicals, nec  
2869 – Industrial Organic Chemicals, nec  
**Operation Permit No.:** F089-14167-00218  
**Permit Reviewer:** Debra Malone, HDEM

The Hammond Department of Environmental Management (HDEM) has reviewed a FESOP renewal application from Halstab Division of Hammond Group, Inc. relating to the operation of an Industrial Inorganic and Organic Chemicals Manufacturing Plant. Halstab Division of Hammond Group, Inc. was issued FESOP 089-5456-00218 on December 12, 1996.

**Permitted Emission Units and Pollution Control Equipment**

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

Note: Bin vent filters and bag filters located at Halstab are the same as or equivalent to baghouses. All of the baghouses are the reverse jet air pulse type and contain filter bags supported by wire cages.

(a) Stack ID S-6: Mill Line No. 1

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper.

Emissions units associated with Stack ID S-6 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 209) followed by a HEPA filter.

(b) Stack ID S-7: Mill Line No. 2

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-7 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 236) followed by a HEPA filter.

(c) Stack ID S-8: Mill Line No. 3

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-8 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 247) followed by a HEPA filter.

(d) Stack ID S-12: Material Dump Station

Bags of material are dumped into a bulk / bagged material dump station.

Emissions units associated with Stack ID S-12 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 506) followed by a HEPA filter.

(e) Stack ID S-14: Blend Scale Hopper

Material is conveyed from the material handling system and product handling systems to a surge hopper, weighed through a Blend Scale Hopper, and then fed into a blender or to a Bulk/Bag Packaging System.

Emissions units associated with Stack ID S-14 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 455) followed by a HEPA filter.

(f) Stack ID S-15: Blender

Material from the Blend Scale Hopper is fed to a Blend Product Hopper, blended, and then sent to a Blended Product Storage Hopper.

Emissions units associated with Stack ID S-15 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 301) followed by a HEPA unit.

(g) Stack ID S-17: Bulk/Bag Packaging System, Mixed Metals System, and Two (2) Portable Packing Stations

Unit ID: S-17-1: Bulk/Bag Packaging System

Product is loaded into either bulk containers or consumable bags for shipment.

Emissions units associated with Stack ID S-17 were installed in November, 1981.

Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

Unit ID: S-17-2: Mixed Metals System

Products are fed into a dump station and transferred to a blender. The blender discharges to a pneumatic conveying line which transfers the blended product to a surge hopper which feeds the bulk/bag packaging stations. The surge hopper can also receive product directly from the Blended Product Handling System for packaging.

Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

Unit ID: S-17-3: Two (2) Portable Packing Stations

Products from a portable tote bin are packaged in bags for shipment.

Emissions from each station are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

### **Unpermitted Emission Units and Pollution Control Equipment**

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

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Stack ID S-3: Acid Dispersion System

Acid is poured into a dispersion tank where water is added.

Emissions units associated with Stack ID S-3 were installed in November, 1981.

There are no emission controls on this unit.

(b) Stack ID S-4: No. 1 Dryer

Reacted compound is conveyed to the dryer to evaporate off water.

Emissions units associated with Stack ID S-4 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 204) followed by a HEPA filter.

(c) Stack ID S-5: Dryer No. 1 Containment System

This stack services the Dryer No. 1 containment system and rework unloading station. The containment system encloses the No. 1 Dryer and captures fugitive emissions in order to reduce employee exposure. The rework unloading station is used to feed rework material to the dryer discharge.

Emissions units associated with Stack ID S-5 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 226) followed by a HEPA filter.

(d) Stack ID S-18: Boiler No. 1

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

(e) Stack ID S-19: Boiler No. 2

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

(f) Stack ID S-21: Dryer No. 3

Reacted compound is conveyed into a drying chamber to evaporate off water. The dried product is separated from the air stream in a product recovery baghouse.

Emissions units associated with Stack ID S-21 were installed in October, 1996.

Emissions from this system are controlled by a product recovery baghouse (No. 805) and a HEPA filter.

(g) Stack ID S-22: Dryer No. 4

Reacted compound is conveyed into a drying chamber. The dried product is separated from the air stream in a product recovery baghouse and packed out in bags.

Emission units associated with Stack ID S-22 were installed in June, 2002.

There are no emission controls on this unit.

- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (i) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (j) Combustion source flame safety purging on startup.
- (k) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (l) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (m) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (n) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (o) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 °F) or;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 °C (68 °F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (p) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (q) Closed loop heating and cooling systems.
- (r) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 % by volume.
- (s) Any operation using aqueous solutions containing less than 1 % by weight of VOCs excluding HAPs.
- (t) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (u) Replacement or repair of bags or baghouses and filters in other air filtration equipment.
- (v) Heat exchanger cleaning and repair.
- (w) Process vessel degassing and cleaning to prepare for internal repairs.
- (x) Paved and unpaved roads and packing lots with public access. [326 IAC 6-1-11.1]  
[326 IAC 6-4]
- (y) Conveyors as follows:
  - 1) Underground conveyors.

- (z) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (aa) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (bb) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.
- (cc) On-site fire and emergency response training approved by the department.
- (dd) Purge double block and bleed valves.
- (ee) Filter or coalescer media changeout.
- (ff) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (gg) Research and development activities as defined in 326 IAC 2-7-1(21)(E).

### **Trivial Activities**

The source also consists of the following trivial activities, as defined in 326 IAC 2-7-1(40):

(a) Stack ID S-1: Feedstock Handling System

Feedstock is pneumatically conveyed from bulk delivery trucks to a storage hopper, a weigh hopper and finally fed to a dispersion system.

Emissions units associated with Stack ID S-1 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 121) followed by a HEPA filter.

(b) Stack ID S-2: Dispersion System

Feedstock is fed to a dispersion tank where it is mixed with water and acid and then fed to a reactor.

Emissions units associated with Stack ID S-2 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 115) followed by a HEPA filter.

(c) Stack ID S-9: Product Handling System No. 1

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-9 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 317) followed by a HEPA filter.

(d) Stack ID S-10: Product Handling System No. 2

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-10 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 318) followed by a HEPA filter.

(e) Stack ID S-11: Product Handling System No. 3

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-11 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 319) followed by a HEPA filter.

(f) Stack ID S-13: Material Handling System

Material is pneumatically conveyed from the dump station to one of three hoppers.

Emissions units associated with Stack ID S-13 were installed in November, 1981.

Emissions from this system are controlled by bin vent filters (No. 653, 654, & 655) and a HEPA filter.

(g) Stack ID S-16: Blended Product Handling System

Blended product is pneumatically conveyed from the blender to one of three hoppers to await packaging.

Emissions units associated with Stack ID S-16 were installed in November, 1981.

Emissions from this system are controlled by bin vent filters (No. 650, 651, & 652) and a HEPA filter.

(h) Stack ID S-20: Central Vacuum System/No. 1 Dryer Vacuum System

The Central Vacuum System is used for general housekeeping throughout the plant.

Emissions units associated with Stack ID S-20 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 447).

### **Existing Approvals**

- (a) FESOP 089-5456-00218, issued on December 12, 1996; and expiring on December 12, 2001.
- (b) First Significant Permit Modification 089-8516, issued on 8/4/97,
- (c) First Administrative Permit Amendment 089-9325, issued on 1/23/98,
- (d) Second Administrative Permit Amendment 089-9528, issued on 3/25/98,
- (e) Third Administrative Permit Amendment 089-9897, issued on 8/24/98,
- (f) Fourth Administrative Permit Amendment 089-10103, issued on 6/25/99,
- (g) First Minor Permit Revision 089-11211, issued on 9/29/99,
- (h) Fifth Administrative Permit Amendment 089-11459, issued on 11/1/99, and
- (i) Sixth Administrative Permit Amendment 089-13797, issued on 3/13/01.

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 Renewal 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 Renewal application for the purposes of this review was received on March 12, 2001. Additional information was received on December 3, 2001 and April 12, 2004.

There was no notice of completeness letter mailed to the source.

### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (pages 1 through 28).

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	< 100
PM-10	< 100
SO <sub>2</sub>	< 100
VOC	< 25
CO	< 100
NO <sub>x</sub>	< 100

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

HAP's	Unrestricted Potential Emissions (tons/yr)
Lead (Pb)	> 25
TOTAL HAPS	> 25

- (a) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions  
 Since this type of operation is 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 2001 OAQ emissions data:

Pollutant	Actual Emissions (tons/yr)
PM	0.3757
PM-10	0.3757
SO <sub>2</sub>	0.0046
VOC	0.0412
CO	0.3453
NO <sub>x</sub>	0.7665
HAP	0.1070

### Potential to Emit After Issuance

The source, issued a FESOP on December 12, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs (Pb)
Stack ID S-1	-	0.964	-	-	-	-	0.18
Stack ID S-2	-	0.350	-	-	-	-	0.13
Stack ID S-3	4.380	4.380	-	-	-	-	-
Stack ID S-4	-	6.395	-	-	-	-	0.31
Stack ID S-5	-	4.511	-	-	-	-	0.31
Stack ID S-6	-	2.497	-	-	-	-	0.22
Stack ID S-7	-	2.497	-	-	-	-	0.22
Stack ID S-8	-	2.497	-	-	-	-	0.22
Stack ID S-9	-	0.876	-	-	-	-	0.18
Stack ID S-10	-	0.876	-	-	-	-	0.18
Stack ID S-11	-	0.876	-	-	-	-	0.18
Stack ID S-12	-	0.876	-	-	-	-	0.18
Stack ID S-13	-	0.876	-	-	-	-	0.18
Stack ID S-14	-	0.876	-	-	-	-	0.18
Stack ID S-15	-	0.876	-	-	-	-	0.18
Stack ID S-16	-	0.876	-	-	-	-	0.18
Stack ID S-17	-	8.716	-	-	-	-	0.31
Stack ID S-18	-	0.035	-	-	-	-	-
Stack ID S-19	-	0.035	-	-	-	-	-
Stack ID S-20	0.127	0.127	-	-	-	-	0.105
Stack ID S-21	10.935	10.935	-	-	-	-	0.31
Stack ID S-22	1.572	1.572	-	-	-	-	-
<b>Total PTE After Issuance</b>	17.014	52.519	Negligible	Negligible	2.722	6.572	3.755 (*10/25)

PM10 emissions are limited in accordance with 326 IAC 6-1-10.1(d) and (h).

Lead emissions are limited in accordance with 326 IAC 15-1-2(a)(7).

\* HAPs emissions are limited to less than 10 tons per year of any individual HAP and less than 25 tons per year of the combination of HAPs.

VOC, CO, and NO<sub>x</sub> emissions are limited to the source's PTE, raised to the next whole number. These pollutants are not limited by any applicable regulations and do not exceed the major source thresholds.

## County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Attainment
PM2.5	Nonattainment
SO <sub>2</sub>	Primary Nonattainment
NO <sub>2</sub>	Unclassifiable/Attainment
1-hour Ozone	Severe Nonattainment
8-hour Ozone	Moderate Nonattainment
CO	Unclassifiable/Attainment
Lead	Attainment

40 CFR Part 81.315 Indiana – eCFR – 3/11/03 Edition

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
- (1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO<sub>x</sub> threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (2) VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Lake County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, NO<sub>2</sub>, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Lake County has been classified as nonattainment in Indiana for SO<sub>2</sub>. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (d) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM<sub>2.5</sub>. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.

- (e) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR Part 60 Subpart Db), Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units are not included in the permit for the Boiler No. 1 and Boiler No. 2. Construction of these units commenced prior to June 19, 1984 and they have a heat input capacity of less than 100 million Btu/hr.

The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR Part 60 Subpart Dc), Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units are not included in the permit for the Boiler No. 1 and Boiler No. 2. Construction of these units commenced prior to June 9, 1989 and they have a heat input capacity of less than 10 million Btu/hr.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.
- (c) The degreasing operation is not subject to the 40 CFR Part 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning because the solvent used in the degreasing operation is not any of the listed regulated solvent
- (d) This source does not involve any pollutant-specific emissions units:
- (1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and
  - (2) that are subject to an emission limit and have a control device that are necessary to meet that limit.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

### **State Rule Applicability - Entire Source**

#### **326 IAC 1-6-3 (Preventive maintenance plans)**

The source has submitted a Preventive Maintenance Plan (PMP) on March 2, 2001. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

#### **326 IAC 2-2 (PSD Requirements)**

This source built in 1981 is a major stationary source for the purposes of PSD because it has the potential to emit Lead (Lb) at a rate of 25 TPY or more. However, 326 IAC 2-8 limits make this source minor for 326 IAC 2-2 (PSD Requirements). It is not one of the 28 listed source categories. The source has not been reviewed under the requirements of 326 IAC 2-2 because there has not been a major modification, as defined in these rules, subject to the requirements of 326 IAC 2-2.

### 326 IAC 2-3 (Emission Offset)

This source built in 1981 is not a major stationary source for the purposes of Emission Offset because it does not have the potential to emit Particulate Matter less than 10 microns (PM10) at 100 TPY or more. The source has not been reviewed under the requirements of 326 IAC 2-3 because there has not been a major modification, as defined in these rules, subject to the requirements of 326 IAC 2-3.

### 326 IAC 2-4.1-1 (New source toxics control)

This source is not subject to 2-4.1-1 (New source toxics control), because it is not a major source of hazardous air pollutants that was constructed or reconstructed after July 27, 1997.

### 326 IAC 2-6 (Emission Reporting)

This source, located in Lake County, does not emit volatile organic compounds (VOC) or oxides of nitrogen (NOx) at levels equal to or greater than twenty-five (25) tons per year or lead at levels equal to or greater than five (5) tons per year; therefore, it is not subject to 326 IAC 2-6 (Emission Reporting).

Per Hammond Ordinance No. 7102, the source will be required to submit an annual emission inventory containing production information, fuel usage and estimated actual emissions of criteria pollutants. The emission inventory must be received by April 15<sup>th</sup> of each year. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. This is a local requirement only.

The source is in compliance with the required emission reporting submittals.

### 326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

This source is subject to 326 IAC 15-1-2(a)(7)(A) Source-specific provisions (for Hammond Group – Halstab Division) which specifically states that Hammond Group – Halstab Division shall install and maintain one (1) baghouse with laminated filters followed by one (1) HEPA filter unit in series with the baghouse on each of stacks S-1, S-2, S-4 through S-17, and S-21. These provisions designed to limit the source's potential to emit lead along with the fact that the initial FESOP required the company to use these control devices to meet the emission limitations as stated in 326 IAC 15-1-2(a)(7) and 326 IAC 6-1-10.1(d) makes these requirements federally enforceable and therefore limits the source's potential emissions to below the major source threshold for a Part 70 permit. In order to demonstrate compliance with the emission limitations the source shall operate the baghouse and HEPA system at all times when the associated facility is in operation and perform Pb testing each permit term. Compliance Monitoring Requirements such as visible emissions notations, parametric monitoring, and baghouse and HEPA filter inspections are also required to show compliance.

### 326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of twenty percent (20%) 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.

No violations of the opacity standards have been observed at this source.

326 IAC 6-1-1 (Particulate; Nonattainment Area Limitations – Applicability)

Pursuant to 326 IAC 6-1-1 (Particulate; Nonattainment Area Limitations – Applicability), sources or facilities specifically listed in section 7 of this rule shall comply with the limitations contained therein. Sources or facilities that are: (1) located in the counties listed in section 7 of this rule; (2) but which sources or facilities are not specifically listed in section 7 of this rule; and (3) have the potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year; shall comply with limitations of applicable sections that follow.

This rule is applicable to this source because it is located in Lake County and is specifically listed in section 7 of this rule and therefore shall comply with the requirements of 326 IAC 6-1-2(a) and 326 IAC 6-1-10.1(d) and (h) Lake County PM10 emission requirements.

326 IAC 6-1-2(a) (Particulate emission limitations)

Facilities not limited by any other subsection in this section shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)). The welding operation is not subject to this rule because it does not have the potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year.

326 IAC 6-1-10.1 (Lake County PM10 emission requirements)

PM10 emissions from each stack at the source shall be limited as listed in 326 IAC 6-1-10.1(d). See table on page 15 of 19 of the TSD for specific stack limits.

Pursuant to 326 IAC 6-1-10.1(h), Stack ID S-18, Boiler No. 1, and Stack ID S-19, Boiler No. 2, shall fire natural gas only and each shall not exceed 0.003 pounds per MMBtu heat input rate or 0.008 pounds per hour and 0.035 tons per year while combusting fuel.

326 IAC 6-1-10.1(l) (Continuous Compliance Plan)

Pursuant to 326 IAC 6-1-10.1(l) (Lake County PM10 Emission Requirements), the Permittee shall submit to IDEM, OAQ and HDEM, and maintain at the source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the inspections, monitoring, and record keeping requirements as specified in 326 IAC 6-1-10.1(m) through (r) or according to the Permittee's CCP. The source has submitted a CCP on March 12, 2001. The CCP has been verified to fulfill the requirements of 326 IAC 6-1-10.1(l) (Continuous Compliance Plan).

326 IAC 6-1-11.1 (Lake County fugitive particulate matter control requirements)

Pursuant to this rule, the Permittee shall be in violation if the opacity of fugitive particulate emissions exceeds ten percent (10%).

326 IAC 6-1-11.2 (Lake County particulate matter contingency measures)

Pursuant to this rule, the Permittee shall comply with the applicable provisions of 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures).

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to this rule, fugitive particulate matter emissions shall not be visibly crossing the property lines.

No violations of the opacity standards have been observed at this source.

326 IAC 6-5 (Fugitive Particulate Matter Emissions)

326 IAC 6-5, for fugitive particulate matter emissions, does not apply because the source is located in Lake County and does not have the potential fugitive particulate matter emissions of twenty-five (25) tons per year or more.

326 IAC 8-7-2 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties – Applicability)

This rule does not apply to this source because the source does not emit or have the potential to emit volatile organic compounds (VOCs) at levels equal to or greater than twenty-five (25) tons per year (tpy) in Lake County.

326 IAC 15-1-2 (Source-specific lead provisions)

Pursuant to 326 IAC 15-1-2, this rule limits lead (Pb) emissions from stacks associated with the Oxide Division as stipulated in 326 IAC 15-1-2(a)(7).

Stack ID	PM10 Limit (lbs/hr)	PM10 Limit (TPY)	PM10 Regulation	Pb Limit (lbs/hr)	Pb Limit (TPY)	Pb Regulation
1) Stack S-1	0.220	0.964	326 IAC 6-1-10.1(d)	0.04	0.18	326 IAC15-1-2(a)(7)
2) Stack S-2	0.080	0.350	326 IAC 6-1-10.1(d)	0.03	0.13	326 IAC15-1-2(a)(7)
3) Stack S-3	1.000	4.380	Hammond AQC Ordinance No. 3522	N/A	N/A	N/A
4) Stack S-4	1.460	6.395	326 IAC 6-1-10.1(d)	0.07	0.31	326 IAC15-1-2(a)(7)
5) Stack S-5	1.030	4.511	326 IAC 6-1-10.1(d)	0.07	0.31	326 IAC15-1-2(a)(7)
6) Stack S-6	0.570	2.497	326 IAC 6-1-10.1(d)	0.05	0.22	326 IAC15-1-2(a)(7)
7) Stack S-7	0.570	2.497	326 IAC 6-1-10.1(d)	0.05	0.22	326 IAC15-1-2(a)(7)
8) Stack S-8	0.570	2.497	326 IAC 6-1-10.1(d)	0.05	0.22	326 IAC15-1-2(a)(7)
9) Stack S-9	0.200	0.876	326 IAC 6-1-10.1(d)	0.04	0.18	326 IAC15-1-2(a)(7)
10) Stack S-10	0.200	0.876	326 IAC 6-1-10.1(d)	0.04	0.18	326 IAC15-1-2(a)(7)
11) Stack S-11	0.200	0.876	326 IAC 6-1-10.1(d)	0.04	0.18	326 IAC15-1-2(a)(7)
12) Stack S-12	0.200	0.876	326 IAC 6-1-10.1(d)	0.04	0.18	326 IAC15-1-2(a)(7)
13) Stack S-13	0.200	0.876	326 IAC 6-1-10.1(d)	0.04	0.18	326 IAC15-1-2(a)(7)
14) Stack S-14	0.200	0.876	326 IAC 6-1-10.1(d)	0.04	0.18	326 IAC15-1-2(a)(7)
15) Stack S-15	0.200	0.876	326 IAC 6-1-10.1(d)	0.04	0.18	326 IAC15-1-2(a)(7)
16) Stack S-16	0.200	0.876	326 IAC 6-1-10.1(d)	0.04	0.18	326 IAC15-1-2(a)(7)
17) Stack S-17	1.990	8.716	326 IAC 6-1-10.1(d)	0.07	0.31	326 IAC15-1-2(a)(7)
18) Stack S-18	0.008	0.035	326 IAC 6-1-10.1(h)	N/A	N/A	N/A
19) Stack S-19	0.008	0.035	326 IAC 6-1-10.1(h)	N/A	N/A	N/A
20) Stack S-20	0.029	0.127	Hammond AQC Ordinance No. 3522	0.024	0.105	Hammond AQC Ordinance No. 3522
21) Stack S-21	2.497	10.935	Hammond AQC Ordinance No. 3522	0.07	0.31	326 IAC15-1-2(a)(7)
22) Stack S-22	0.359	1.572	Hammond AQC Ordinance No. 3522	N/A	N/A	N/A
<b>Totals:</b>	<b>11.991</b>	<b>52.519</b>		<b>1.138</b>	<b>3.755</b>	

Pursuant to 326 IAC 15-1-2(a)(7)(A), Hammond Group-Halstab Division shall install and maintain one (1) baghouse with laminated filters followed by one (1) HEPA filter unit in series with the baghouse on each of stacks S-1, S-2, S-4 through S-17, and S-21.

**State Rule Applicability - Individual Facilities**

326 IAC 7-4-1.1 (Lake County sulfur dioxide emission limitations)

This rule does not apply to this source because the source does not have the potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.

326 IAC 8-1-6 (New facilities; general reduction requirements)

No facility at this source is applicable to this rule because no facility has the potential to emit VOC emissions of 25 tons or more per year.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

This rule does not apply to this source because the source does not have potential emissions of one hundred (100) tons or greater per year of VOC and it does not have a facility of the type described in the rule.

**Local Rule Applicability**

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from the following emission units shall not exceed the pounds per hour emission rates listed below:

Stack ID	PM Emission Limit (lbs/hr)	PM Emission Limit (tons/year)
S-3	1.000	4.380
S-20	0.029	0.127
S-21	2.497	10.935
S-22	0.359	1.572

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM<sub>10</sub> emissions from the following emission units shall not exceed the pounds per hour emission rates listed below:

Stack ID	PM <sub>10</sub> Emission Limit (lbs/hr)	PM <sub>10</sub> Emission Limit (tons/year)
S-3	1.000	4.380
S-20	0.029	0.127
S-21	2.497	10.935
S-22	0.359	1.572

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the Pb emissions from the following emission units shall not exceed the pounds per hour emission rates listed below:

Stack ID	Pb Emission Limit (lbs/hr)	Pb Emission Limit (tons/year)
S-20	0.024	0.105

## Testing Requirements

All testing requirements from previous approvals were incorporated into this FESOP.

Compliance stack tests were required on the following facilities to demonstrate compliance with the applicable lead (Pb) emission limits. All performance testing was required initially within three (3) years after receipt of the permit and then periodically, every five (5) years.

- (a) Stack ID S-1: Feedstock Handling System
- (b) Stack IDs S-4 & S-5: No. 1 Dryer & Dryer No. 1 Containment System  
Initial stack testing on Stack S-4. Periodic on one of the two systems.
- (c) Stack IDs S-6, S-7, & S-8: Mill Lines No. 1, 2, & 3  
Initial stack testing on Stack ID S-6. Periodic on one of the three lines.
- (d) Stack IDs S-9, S-10 & S-11: Product Handling Systems No. 1, 2, & 3  
One of the three systems for initial and periodic.
- (e) Stack ID S-12: Material Dump Station
- (f) Stack ID S-13: Material Handling System
- (g) Stack ID S-14: Blend Scale Hopper
- (h) Stack ID S-15: Blender
- (i) Stack ID S-16: Blended Product Handling System
- (j) Stack ID S-17: Bulk/Bag Packaging System, Mixed Metals System, and Two (2) Portable Packing Stations
- (k) Stack ID S-21: Dryer No. 3

All testing requirements from previous approvals were incorporated into this FESOP except for the following:

- (a) Stack ID S-1 (qualifies as a trivial activity)
- (b) Stack ID S-4 (qualifies as an insignificant activity)
- (c) Stack ID S-5 (qualifies as an insignificant activity)
- (d) Stack IDs S-9, S-10 & S-11 (qualifies as a trivial activity)
- (e) Stack ID S-13 (qualifies as a trivial activity)
- (f) Stack ID S-14 This unit is an inherent part of Stack ID S-15 Blender. All material going to the blender must pass through the blend scale hopper. The blender is the more significant emission unit while the blend scale hopper is only a support unit. Stack ID S-15 has demonstrated a large margin of compliance through past stack testing.
- (g) Stack ID S-16 (qualifies as a trivial activity)
- (h) Stack ID S-21 (qualifies as an insignificant activity)

Previous stack tests to comply with this requirement were conducted on:

- (a) Stack ID S-1; Pb test performed on July 20 & 21, 1998.
- (b) Stack IDs S-4 & S-5; Pb test on S-4 performed on June 3, 1998.  
Initial stack testing on Stack S-4. Periodic on one of the two systems.
- (c) Stack IDs S-6, S-7, & S-8; Pb test on S-8 performed on October 6, 1998.  
Initial stack testing on Stack ID S-6. Periodic on one of the three lines.
- (d) Stack IDs S-9, S-10 & S-11; Pb test on S-11 performed on September 22, 1999.  
One of the three systems for initial and periodic.
- (e) Stack ID S-12; Pb test performed on June 2, 1998.
- (f) Stack ID S-13; Pb test performed on June 2, 1998.
- (g) Stack ID S-14; Pb test performed on September 22, 1999.
- (h) Stack ID S-15; Pb test performed on September 22, 1999.
- (i) Stack ID S-16; Pb test performed on September 22, 1999.
- (j) Stack ID S-17; Pb test performed on October 6, 1998.
- (k) Stack ID S-21; Pb test performed on October 6, 1998.

## 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 source has applicable compliance monitoring conditions as specified below:
  - (a) Once per day visible emissions notations of Stack IDs S-1, S-2, S-3, S-4, S-5, S-6, S-7, S-8, S-9, S-10, S-11, S-12, S-13, S-14, S-15, S-16, S-17, S-20, S-21, and S-22 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 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 control equipment controlling S-1, S-2, S-4, S-5, S-6, S-7, S-8, S-9, S-10, S-11, S-12, S-13, S-14, S-15, S-16, S-17, and S-21 at least once per day when the associated process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the control equipment shall be maintained within the ranges specified for each stack ID listed in the permit. 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.
  - (c) In order to eliminate unnecessary exposure to lead dust and to comply with the OSHA permissible exposure limit for lead, an inspection shall be performed on an as needed basis of all bags and HEPA filters controlling the process associated with S-1, S-2, S-4 through S-17, and S-21 when venting to the atmosphere. A baghouse 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 shall be replaced.

- (d) In the event that bag failure has been observed:

For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and 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 Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

For single compartment baghouses, 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).

These monitoring conditions are necessary because the control equipment must operate properly to ensure compliance with 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), 326 IAC 15-1-2 (Source-specific lead provisions), and 326 IAC 2-8 (FESOP).

All compliance requirements from previous approvals were incorporated into this FESOP except the following:

1. The operating hours for the following facilities shall be limited as follows:

Stack ID(s)	Quarterly Operating Hours Limitation
S-1	166.5
S-9, S-10, S-11	625 (per stack)
S-12 & S-13	250 (per stack)
S-14 & S-16	1000 (per stack)
S-15	1500

Reasons not incorporated:

The lead rule 326 IAC 15-1-2(a)(7) was amended to eliminate the quarterly operating hour restriction on those Stack ID(s) listed above.

## Conclusion

The operation of this **Industrial Inorganic and Organic Chemicals Manufacturing Plant** shall be subject to the conditions of the attached proposed (**FESOP No.: F089-14167-00218**).

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

and

**Hammond Department of Environmental Management**

Addendum to the Technical Support Document for a  
Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name: Halstab Division of Hammond Group, Inc.  
Source Location: 3100 Michigan Street, Hammond, Indiana 46323  
County: Lake  
SIC Code: 2819 -- Industrial Inorganic Chemicals, nec  
2869 -- Industrial Organic Chemicals, nec  
Operation Permit No.: **F089-14167-00218**  
Permit Reviewer: Debra Malone, HDEM

On April 25, 2005, the Hammond Department of Environmental Management (HDEM) had a notice published in the Times, Hammond, Indiana, stating that Halstab Division of Hammond Group, Inc. had applied for a Federally Enforceable State Operating Permit Renewal to operate an Industrial Inorganic and Organic Chemicals Manufacturing Plant. The notice also stated that HDEM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the HDEM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

**FESOP -- Table of Contents**

1. On page 2 of 94, under Section B GENERAL CONDITIONS, Section B.6 Severability, the "q" at the end of the line has been removed.  
  
B.6 Severability [326 IAC 2-8-4(4)]~~q~~
  
2. On page 3 of 94, the rule cite under Section C.16 Pressure Gauge and Other Instrument Specifications has been changed to match what is in the permit on page 33 of 94.  
  
C.16 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]  
[326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

Also, on page 3 of 94, the rule cite in the heading **Corrective Actions and Response Steps** has been changed from **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]** to **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

Again on page 3 of 94, above Section D.1.11 Record Keeping Requirements, the heading has been changed from **Record Keeping and Reporting Requirements** to **Record Keeping Requirements**. There are no reporting requirements.

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

The following Section headings were modified to incorporate this change also:

On page 4 of 94, above Section D.2.11 Record Keeping Requirements  
On page 4 of 94, above Section D.3.10 Record Keeping Requirements  
On page 5 of 94, above Section D.4.11 Record Keeping Requirements  
On page 5 of 94, above Section D.5.11 Record Keeping Requirements  
On page 5 of 94, above Section D.6.5 Record Keeping Requirements  
On page 6 of 94, above Section D.7.10 Record Keeping Requirements  
On page 6 of 94, above Section D.8.10 Record Keeping Requirements  
On page 7 of 94, above Section D.9.3 Record Keeping Requirements  
On page 7 of 94, above Section D.10.11 Record Keeping Requirements  
On page 7 of 94, above Section D.11.5 Record Keeping Requirements  
On page 8 of 94, above Section D.12.10 Record Keeping Requirements  
On page 8 of 94, above Section D.13.10 Record Keeping Requirements  
On page 9 of 94, above Section D.14.10 Record Keeping Requirements  
On page 9 of 94, above Section D.15.10 Record Keeping Requirements  
On page 9 of 94, above Section D.16.10 Record Keeping Requirements  
On page 10 of 94, above Section D.17.6 Record Keeping Requirements

3. On page 5 of 94, the rule cite under Section D.6.2 has been modified to read Hammond AQC Ordinance No. 3255 (as amended).

D.6.2 Particulate Matter less than 10 microns in diameter (PM10) [**Hammond AQC Ordinance No. 3522 (as amended)**] [326 IAC 2-8-4]

The following Sections should be modified to incorporate this change also:

On page 7 of 94, Section D.10.2 and Section D.11.2  
On page 10 of 94, Section D.17.2

4. On page 13 of 94, under A.3 Insignificant Activities, a bracket (]) has been inserted at the end of the following line:

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

5. On page 31 of 94, C.10 Asbestos Abatement Projects, Section (f), the R in Renovation has been capitalized.

(f) Demolition and **R**enovation

6. On page 36 of 94, under C.21 General Record Keeping Requirements, Section (a), there was a large gap in the middle of the paragraph.

C.21 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

This has been corrected.

C.21 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

7. On page 37 of 94, above C.23 Compliance with 40 CFR and 326 IAC 22-1, the header Stratospheric Ozone Protection has been inserted above this section.

**Stratospheric Ozone Protection**

C.23 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:

8. On page 58 of 94, above D.6.5 Record Keeping Requirements, the heading above this section should read Record Keeping Requirements, not Record Keeping and Reporting Requirements. There are no reporting requirements.

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

D.6.5 Record Keeping Requirements

- (a) To document compliance with Condition D.6.4, the Permittee shall maintain records of visible emission notations of the Stack ID S-3 exhaust once per day.

This change has been made. This change should also be made to the following:

On page 89 of 94, the header above D.17.6 Record Keeping Requirements

Appendix A: Emission Calculations

Plant ID: 00218

Company Name: Halstab Division of Hammond Group, Inc. (HGI)

Address: 3100 Michigan Street, Hammond, Indiana 46323

Public Copy

Calculations By: DM

NO. OF POINTS: 22  
NO. OF SEGMENTS: 36

\* 2001 Actuals: As per the 2001 Emission Statement submitted on 4/12/02 unless noted otherwise.

\*\*NOTES\*\*

EF: EMISSION FACTOR  
CE: CONTROL EFFICIENCY

MDR: MAXIMUM DESIGN RATE  
MDC: MAXIMUM DESIGN CAPACITY

Ts: STACK DISCHARGE TEMPERATURE  
UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

**\*\* SOURCE TOTALS: HALSTAB DIVISION OF HAMMOND GROUP, INC. (HGI) \*\***

POLLUTANT	POTENTIAL TO EMIT (PTE)						PERMIT LIMIT		2001 ACTUAL	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE	AFTER
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)			CONTROLS	CONTROLS
PM	22.4424	538.6181	98.2978	1.4422	6.3167	0.3353	N/A	N/A	8.2796	0.3757
PM10	22.4424	538.6181	98.2978	1.4422	6.3167	0.3353	11.991	52.519	8.2796	0.3757
SOx	0.0090	0.2161	0.0394	0.0090	0.0394	N/A	N/A	N/A	0.0046	0.0046
NOx	1.5005	36.0132	6.5724	1.5005	6.5724	N/A	N/A	N/A	0.7665	0.7665
VOC	0.0805	1.9328	0.3527	0.0805	0.3527	N/A	N/A	N/A	0.0412	0.0412
CO	0.6215	14.9164	2.7222	0.6215	2.7222	N/A	N/A	N/A	0.3453	0.3453
LEAD	17.3068	415.3633	75.8038	0.0275	0.1203	N/A	0.844	3.696	6.6069	0.1070