



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: April 19, 2006  
RE: Powder Processing Technology, LLC / 127-17568-00021  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

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

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

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

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

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

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

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

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

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

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

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

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



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Powder Processing Technology, LLC  
5103 Evans Avenue  
Valparaiso, Indiana 46383**

(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 Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 127-17568-00021	
Original signed by :  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 19, 2006  Expiration Date: April 19, 2011

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## SECTION A

## SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary reprographic ferrite bead manufacturing source.

Responsible Official:	Manager of Manufacturing/Facilities
Source Address:	5103 Evans Avenue, Valparaiso, Indiana 46383
Mailing Address:	5103 Evans Avenue, Valparaiso, Indiana 46383
General Source Phone Number:	(219) - 462 - 4141
SIC Code:	3499
County Location:	Porter
Source Location Status:	Nonattainment for 8-hour ozone, 1-hour ozone, and PM <sub>2.5</sub> Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD, Emission Offset Rules, and Nonattainment NSR Minor Source, Section 112 of the Clean Air Act

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

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

- (a) Two (2) 3-foot by 20-foot direct-fired calciners, identified as A-CS-3 and A-CS-4, installed before 1970, each equipped with a baghouse, identified as A-DC-1, exhausting through vents V-ACS-3 and V-ACS-4, capacity: 600 pounds per hour of nickel-zinc ferrite, each.
- (b) One (1) indirect-fired calciner, identified as A-CS-2, installed in 1995, equipped with a baghouse, identified as A-DC-1, exhausting through stacks V-ACS-2 and V-AHX-1, capacity: 1,600 pounds per hour of nickel-zinc ferrite.
- (c) One (1) 20-foot dryer, identified as A-SD-1, installed in 1973, equipped with parallel cyclones and a baghouse, identified as A-SD-1, and a cartridge dust collector, exhausting through stack V-BSD-1, capacity: 3,500 pounds per hour of nickel-zinc ferrite.
- (d) One (1) ball milling unit, identified as A-BM-7, installed in 1973, equipped with a cartridge dust collector, exhausting to the interior, capacity: 21,000 pounds per batch (1,400 pounds per hour) of nickel-zinc ferrite beads.
- (e) Six (6) green bead screening units, identified as A-GB-1, installed in 1973, equipped with a baghouse, identified as A-GB-1, exhausting to the interior, capacity: 500 pounds per hour of reprographic powder, total.
- (f) One (1) fire bead screening operation, identified as A-FB-1, installed in 1973, equipped with a baghouse and cartridge dust collector, identified as A-FB-1, exhausting to the interior, capacity: 500 pounds per hour of reprographic powder.
- (g) One (1) weigh up operation, identified as A-WU-1, installed in 1970, equipped with a baghouse, identified as A-WU-1, exhausting through stack V-AWU-1, capacity: 3,000 pounds per

hour of nickel, zinc and iron oxides.

- (h) One (1) 17.5-foot dryer, identified as B-SD-1, installed in 1984, equipped with parallel cyclones and a cartridge dust collector, exhausting through stack V-BSD-1, capacity: 2,500 pounds per hour of copper-zinc and magnesium ferrite.
- (i) One (1) 9.5-foot anhydrous spray dryer, identified as B-SD-2, installed in 1984, equipped with a cyclone and cartridge dust collector, exhausting through stack V-BSD-1, capacity: 580 pounds per hour of copper-zinc and magnesium ferrite beads.
- (j) One (1) 5-foot by 40-foot direct-fired calciner, identified as B-C-1, installed in 1970, equipped with a baghouse for particulate control, exhausting through stack VBCS-1, capacity: 1,500 pounds per hour of copper-zinc and magnesium ferrite.
- (k) One (1) 16-foot spray dryer, identified as C-SD-1, installed before 1970, equipped with three (3) parallel cyclone separators and a cartridge dust collector, exhausting through stack V-CSD-1, capacity: 1,500 pounds per hour of strontium ferrite beads.
- (l) Four (4) green bead screening units, identified as C-GB-1, installed in 1984, equipped with a cartridge dust collector, exhausting to the interior, capacity: 500 pounds per hour of strontium ferrite, each.
- (m) One (1) sagger weigh up operation, identified as C-WU-1, installed in 1980, equipped with two (2) cabinet dust collectors, exhausting to the interior, capacity: 2,800 pounds per hour strontium, copper and iron oxides and ferrite.
- (n) One (1) fire bead screening unit, identified as C-GB-2, installed in 1984, equipped with a cartridge dust collector, exhausting to the interior, capacity: 500 pounds per hour of strontium ferrite.
- (o) One (1) 3-foot by 26-foot indirect-fired calciner unit, identified as C-CS-6, installed in 1996, equipped with a baghouse dust collector, exhausting through stacks V-CCS-6 and V-CHX-6, capacity: 1,600 pounds per hour of nickel-zinc ferrite, zinc oxide and ferrite.
- (p) One (1) 3-foot by 26-foot indirect-fired calciner unit, identified as C-CS-7, installed in 1996, equipped with a baghouse dust collector, exhausting through stacks V-CCS-7 and V-CHX-7, capacity: 1,600 pounds per hour of nickel-zinc ferrite, zinc oxide and ferrite.
- (q) Blending/packaging operations, identified as A-BL-1, installed in 1993, equipped with a dust collector, identified as A-BL-1, exhausting to the interior, capacity: 2,000 pounds per hour of nickel-zinc ferrite.
- (r) Bulk handling operations, identified as A-BH-1, installed in 1995, equipped with a dust collector, identified as A-BH-1, exhausting to the interior, capacity: 1,600 pounds per hour of nickel-zinc ferrite.
- (s) Six (6) ball milling units, identified as A-BM-1 to A-BM-6, installed in 1973, each equipped with a cartridge dust collector, identified as A-BM-1 to A-BM-6, exhausting to the interior, capacity: 7,500 pounds per batch (500 pounds per hour) of nickel-zinc ferrite beads, each.

- (t) Three (3) fire bead screening units, identified as B-FB-1, installed in 1989, equipped with a cartridge dust collector, exhausting to the interior, capacity: 500 pounds per hour of copper-zinc and magnesium ferrite, each.
- (u) Four (4) green bead screening units, identified as B-GB-1, installed in 1984, equipped with a cartridge dust collector, exhausting to the interior, capacity: 500 pounds per hour of copper-zinc and magnesium ferrite, each.
- (v) One (1) wet ball milling operation, identified as B-WB-1, installed in 1980, equipped with a cartridge dust collector, exhausting to the interior, capacity: 10,000 pounds per batch (666.7 pounds per hour) of copper-zinc and magnesium ferrite beads.
- (w) One (1) ball mill operation, utilizing a wet batch process, identified as B-BM-1, installed in 1992, equipped with a cartridge dust collector, exhausting to the interior, capacity: 580 pounds per hour of copper-zinc and magnesium ferrite beads.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) One (1) heating boiler, identified as C-HB-1, exhausting through stack V-CHB-1, rated at 5.25 million British thermal units per hour [326 IAC 6-2-2].
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T 127-17568-00021 is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

### B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.4 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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 of each year to:

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:-
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (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

Northwest Regional Office: 219-757-0265, Facsimile Number: 219-757-0267

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compli-

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T 127-17658-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]
- (c) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

- (d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (e) 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.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

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

and

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

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

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

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]**

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

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

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

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

B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

performance or compliance test or procedure had been performed.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

**C.2 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

**C.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 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

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

- (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 2-7-6(1)]**

#### **C.7 Performance Testing [326 IAC 3-6]**

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the 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.8 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

**C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

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

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

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

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

**C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
within ninety (90) days after the date of issuance of this permit.  
  
The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:
  - (1) starting in 2007 and every three (3) years thereafter, and
  - (2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.
- (b) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

**Stratospheric Ozone Protection**

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]: Ferrite Bead Manufacturing Operations**

- (a) Two (2) 3-foot by 20-foot direct-fired calciners, identified as A-CS-3 and A-CS-4, installed before 1970, each equipped with a baghouse, identified as A-DC-1, exhausting through vents V-ACS-3 and V-ACS-4, capacity: 600 pounds per hour of nickel-zinc ferrite, each.
- (b) One (1) indirect-fired calciner, identified as A-CS-2, installed in 1995, equipped with a baghouse, identified as A-DC-1, exhausting through stacks V-ACS-2 and V-AHX-1, capacity: 1,600 pounds per hour of nickel-zinc ferrite.
- (c) One (1) 20-foot dryer, identified as A-SD-1, installed in 1973, equipped with parallel cyclones and a baghouse, identified as A-SD-1, and a cartridge dust collector, exhausting through stack V-BSD-1, capacity: 3,500 pounds per hour of nickel-zinc ferrite.
- (d) One (1) ball milling unit, identified as A-BM-7, installed in 1973, equipped with a cartridge dust collector, exhausting to the interior, capacity: 21,000 pounds per batch (1,400 pounds per hour) of nickel-zinc ferrite beads.
- (e) Six (6) green bead screening units, identified as A-GB-1, installed in 1973, equipped with a baghouse, identified as A-GB-1, exhausting to the interior, capacity: 500 pounds per hour of reprographic powder, total.
- (f) One (1) fire bead screening operation, identified as A-FB-1, installed in 1973, equipped with a baghouse and cartridge dust collector, identified as A-FB-1, exhausting to the interior, capacity: 500 pounds per hour of reprographic powder.
- (g) One (1) weigh up operation, identified as A-WU-1, installed in 1970, equipped with a bag-house, identified as A-WU-1, exhausting through stack V-AWU-1, capacity: 3,000 pounds per hour of nickel, zinc and iron oxides.
- (h) One (1) 17.5-foot dryer, identified as B-SD-1, installed in 1984, equipped with parallel cyclones and a cartridge dust collector, exhausting through stack V-BSD-1, capacity: 2,500 pounds per hour of copper-zinc and magnesium ferrite.
- (i) One (1) 9.5-foot anhydrous spray dryer, identified as B-SD-2, installed in 1984, equipped with a cyclone and cartridge dust collector, exhausting through stack V-BSD-1, capacity: 580 pounds per hour of copper-zinc and magnesium ferrite beads.
- (j) One (1) 5-foot by 40-foot direct-fired calciner, identified as B-C-1, installed in 1970, equipped with a baghouse for particulate control, exhausting through stack VBCS-1, capacity: 1,500 pounds per hour of copper-zinc and magnesium ferrite.
- (k) One (1) 16-foot spray dryer, identified as C-SD-1, installed before 1970, equipped with three (3) parallel cyclone separators and a cartridge dust collector, exhausting through stack V-CSD-1, capacity: 1,500 pounds per hour of strontium ferrite beads.
- (l) Four (4) green bead screening units, identified as C-GB-1, installed in 1984, equipped with a cartridge dust collector, exhausting to the interior, capacity: 500 pounds per hour of strontium ferrite, each.
- (m) One (1) sagger weigh up operation, identified as C-WU-1, installed in 1980, equipped with two (2) cabinet dust collectors, exhausting to the interior, capacity: 2,800 pounds per hour strontium, copper and iron oxides and ferrite.

- (n) One (1) fire bead screening unit, identified as C-GB-2, installed in 1984, equipped with a cartridge dust collector, exhausting to the interior, capacity: 500 pounds per hour of strontium ferrite.
- (o) One (1) 3-foot by 26-foot indirect-fired calciner unit, identified as C-CS-6, installed in 1996, equipped with a baghouse dust collector, exhausting through stacks V-CCS-6 and V-CHX-6, capacity: 1,600 pounds per hour of nickel-zinc ferrite, zinc oxide and ferrite.
- (p) One (1) 3-foot by 26-foot indirect-fired calciner unit, identified as C-CS-7, installed in 1996, equipped with a baghouse dust collector, exhausting through stacks V-CCS-7 and V-CHX-7, capacity: 1,600 pounds per hour of nickel-zinc ferrite, zinc oxide and ferrite.
- (q) Blending/packaging operations, identified as A-BL-1, installed in 1993, equipped with a dust collector, identified as A-BL-1, exhausting to the interior, capacity: 2,000 pounds per hour of nickel-zinc ferrite.
- (r) Bulk handling operations, identified as A-BH-1, installed in 1995, equipped with a dust collector, identified as A-BH-1, exhausting to the interior, capacity: 1,600 pounds per hour of nickel-zinc ferrite.
- (s) Six (6) ball milling units, identified as A-BM-1 to A-BM-6, installed in 1973, each equipped with a cartridge dust collector, identified as A-BM-1 to A-BM-6, exhausting to the interior, capacity: 7,500 pounds per batch (500 pounds per hour) of nickel-zinc ferrite beads, each.
- (t) Three (3) fire bead screening units, identified as B-FB-1, installed in 1989, equipped with a cartridge dust collector, exhausting to the interior, capacity: 500 pounds per hour of copper-zinc and magnesium ferrite, each.
- (u) Four (4) green bead screening units, identified as B-GB-1, installed in 1984, equipped with a cartridge dust collector, exhausting to the interior, capacity: 500 pounds per hour of copper-zinc and magnesium ferrite, each.
- (v) One (1) wet ball milling operation, identified as B-WB-1, installed in 1980, equipped with a cartridge dust collector, exhausting to the interior, capacity: 10,000 pounds per batch (666.7 pounds per hour) of copper-zinc and magnesium ferrite beads.
- (w) One (1) ball mill operation, utilizing a wet batch process, identified as B-BM-1, installed in 1992, equipped with a cartridge dust collector, exhausting to the interior, capacity: 580 pounds per hour of copper-zinc and magnesium ferrite beads.

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

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

#### **D.1.1 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rates from the abrasive blasting operations shall be limited as follows:

<b>Process</b>	<b>Process Weight (tons per year)</b>	<b>Allowable PM Emission Rate (pounds per hour)</b>
Direct fired calciners (A-CS-3 & 4)	0.30, each	1.83, each
Indirect fired calciner (A-CS-2)	0.80	3.53
20-foot dryer (A-SD-1)	1.75	5.97
Blending/packaging operations (A-BL-1)	1.00	4.10
Bulk handling (A-BH-1)	0.80	3.53
Six (6) ball milling units (A-BM-1 to A-BM-6)	0.25, each	1.62, each
Ball milling unit (A-BM-7)	0.70	3.23
Six (6) green bead screening units (A-GB-1)	0.25, total	1.62, total
Fire-bead screening unit (A-FB-1)	0.25	1.62
Weigh up units (A-WU-1)	1.50	5.38
Direct-fired rotary calciner (B-C-1)	0.75	3.38
Spray dryer (B-SD-1)	1.25	4.76
Three (3) fire bead screening units (B-FB-1)	0.75, total	3.38, total
Four (4) green bead screening units (B-GB-1)	1.00, total	4.10, total
Wet ball milling (B-WB-1)	0.333	1.96
Ball mill operation (B-BM-1)	0.29	1.70
Spray dryer (B-SD-2)	0.29	1.79
Spray dryer (C-SD-1)	0.75	3.38
Four (4) green bead screening units (C-GB-1)	1.00, total	4.10, total
Sagger weigh-up unit (C-WU-1)	1.40	5.14
Indirect calciner (C-CS-6)	0.80	3.53
Indirect calciner (C-CS-7)	0.80	3.53
Fire bead screening area (C-GB-2)	0.25	1.62

The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

### **Compliance Determination Requirements**

#### **D.1.3 Particulate Control [326 IAC 2-7-6(6)]**

- (a) In order to comply with Condition D.1.1 and because the control devices are considered integral to the process, all of the baghouses, cyclones, and cartridge dust collectors, for particulate control, shall be in operation and control emissions from the ferrite bead manufacturing operations at all times that the ferrite bead manufacturing operations are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (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.

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

#### **D.1.4 Visible Emissions Notations**

- (a) Visible emission notations of the ferrite bead manufacturing stacks exhausts (A-CS-3, A-CS-4, A-CS-2, A-SD-1, A-BM-7, A-GB-1, A-FB-1, A-WU-1, B-C-1, B-SD-1, B-SD-2, C-SD-1, C-GB-1, C-WU-1, C-CS-6, C-CS-7 and C-GB-2) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### **D.1.5 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the baghouse operations. 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).

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

#### D.1.6 Cyclone Failure Detection

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In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

#### D.1.7 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain daily records of visible emission notations of the baghouse stack exhausts.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.



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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Powder Processing Technology, LLC  
Source Address: 5103 Evans Avenue, Valparaiso, Indiana 46383  
Mailing Address: 5103 Evans Avenue, Valparaiso, Indiana 46383  
Part 70 Permit No.: T 127-17568-00021

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: Powder Processing Technology, LLC  
Source Address: 5103 Evans Avenue, Valparaiso, Indiana 46383  
Mailing Address: 5103 Evans Avenue, Valparaiso, Indiana 46383  
Part 70 Permit No.: T 127-17568-00021

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)
<input checked="" type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
<input checked="" type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <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**

**PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Powder Processing Technology, LLC  
 Source Address: 5103 Evans Avenue, Valparaiso, Indiana 46383  
 Mailing Address: 5103 Evans Avenue, Valparaiso, Indiana 46383  
 Part 70 Permit No.: T 127-17568-00021

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

<p>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".</p>	
<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**

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Powder Processing Technology, LLC</b>
<b>Source Location:</b>	<b>5103 Evans Avenue</b>
<b>County:</b>	<b>Porter</b>
<b>SIC Code:</b>	<b>3499</b>
<b>Operation Permit No.:</b>	<b>T 127-8479-00021</b>
<b>Operation Permit Issuance Date:</b>	<b>December 16, 1998</b>
<b>Permit Renewal No.:</b>	<b>T 127-17568-00021</b>
<b>Permit Reviewer:</b>	<b>Brian J. Pedersen</b>

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Powder Processing Technology, LLC relating to the operation of a reprographic ferrite bead manufacturing source.

**History**

Powder Processing Technology, LLC was issued a Part 70 Operating Permit, T 127-8479-00021 on December 16, 1998. After submitting their renewal application on February 25, 2003 with additional information received on November 16, 2005, it was determined that the coating line was no longer in operation. Therefore, the revised present potential to emit is below the thresholds for Part 70 rules and regulations. On November 16, 2005 the source determined it would like to remain subject to the Part 70 rules in the event of new construction.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) Two (2) 3-foot by 20-foot direct-fired calciners, identified as A-CS-3 and A-CS-4, installed before 1970, each equipped with a baghouse, identified as A-DC-1, exhausting through vents V-ACS-3 and V-ACS-4, capacity: 600 pounds per hour of nickel-zinc ferrite, each.
- (b) One (1) indirect-fired calciner, identified as A-CS-2, installed in 1995, equipped with a baghouse, identified as A-DC-1, exhausting through stacks V-ACS-2 and V-AHX-1, capacity: 1,600 pounds per hour of nickel-zinc ferrite.
- (c) One (1) 20-foot dryer, identified as A-SD-1, installed in 1973, equipped with parallel cyclones and a baghouse, identified as A-SD-1, and a cartridge dust collector, exhausting through stack V-BSD-1, capacity: 3,500 pounds per hour of nickel-zinc ferrite.
- (d) One (1) ball milling unit, identified as A-BM-7, installed in 1973, equipped with a cartridge dust collector, exhausting to the interior, capacity: 21,000 pounds per batch (1,400 pounds per hour) of nickel-zinc ferrite beads.
- (e) Six (6) green bead screening units, identified as A-GB-1, installed in 1973, equipped with a baghouse, identified as A-GB-1, exhausting to the interior, capacity: 500 pounds per hour of reprographic powder, total.
- (f) One (1) fire bead screening operation, identified as A-FB-1, installed in 1973, equipped with a baghouse and cartridge dust collector, identified as A-FB-1, exhausting to the interior, capacity: 500 pounds per hour of reprographic powder.

- (g) One (1) weigh up operation, identified as A-WU-1, installed in 1970, equipped with a baghouse, identified as A-WU-1, exhausting through stack V-AWU-1, capacity: 3,000 pounds per hour of nickel, zinc and iron oxides.
- (h) One (1) 17.5-foot dryer, identified as B-SD-1, installed in 1984, equipped with parallel cyclones and a cartridge dust collector, exhausting through stack V-BSD-1, capacity: 2,500 pounds per hour of copper-zinc and magnesium ferrite.
- (i) One (1) 9.5-foot anhydrous spray dryer, identified as B-SD-2, installed in 1984, equipped with a cyclone and cartridge dust collector, exhausting through stack V-BSD-1, capacity: 580 pounds per hour of copper-zinc and magnesium ferrite beads.
- (j) One (1) 5-foot by 40-foot direct-fired calciner, identified as B-C-1, installed in 1970, equipped with a baghouse for particulate control, exhausting through stack V-BCS-1, capacity: 1,500 pounds per hour of copper-zinc and magnesium ferrite.
- (k) One (1) 16-foot spray dryer, identified as C-SD-1, installed before 1970, equipped with three (3) parallel cyclone separators and a cartridge dust collector, exhausting through stack V-CSD-1, capacity: 1,500 pounds per hour of strontium ferrite beads.
- (l) Four (4) green bead screening units, identified as C-GB-1, installed in 1984, equipped with a cartridge dust collector, exhausting to the interior, capacity: 500 pounds per hour of strontium ferrite, each.
- (m) One (1) sagger weigh up operation, identified as C-WU-1, installed in 1980, equipped with two (2) cabinet dust collectors, exhausting to the interior, capacity: 2,800 pounds per hour strontium, copper and iron oxides and ferrite.
- (n) One (1) fire bead screening unit, identified as C-GB-2, installed in 1984, equipped with a cartridge dust collector, exhausting to the interior, capacity: 500 pounds per hour of strontium ferrite.
- (o) One (1) 3-foot by 26-foot indirect-fired calciner unit, identified as C-CS-6, installed in 1996, equipped with a baghouse dust collector, exhausting through stacks V-CCS-6 and V-CHX-6, capacity: 1,600 pounds per hour of nickel-zinc ferrite, zinc oxide and ferrite.
- (p) One (1) 3-foot by 26-foot indirect-fired calciner unit, identified as C-CS-7, installed in 1996, equipped with a baghouse dust collector, exhausting through stacks V-CCS-7 and V-CHX-7, capacity: 1,600 pounds per hour of nickel-zinc ferrite, zinc oxide and ferrite.
- (q) Blending/packaging operations, identified as A-BL-1, installed in 1993, equipped with a dust collector, identified as A-BL-1, exhausting to the interior, capacity: 2,000 pounds per hour of nickel-zinc ferrite.
- (r) Bulk handling operations, identified as A-BH-1, installed in 1995, equipped with a dust collector, identified as A-BH-1, exhausting to the interior, capacity: 1,600 pounds per hour of nickel-zinc ferrite.

- (s) Six (6) ball milling units, identified as A-BM-1 to A-BM-6, installed in 1973, each equipped with a cartridge dust collector, identified as A-BM-1 to A-BM-6, exhausting to the interior, capacity: 7,500 pounds per batch (500 pounds per hour) of nickel-zinc ferrite beads, each.
- (t) Three (3) fire bead screening units, identified as B-FB-1, installed in 1989, equipped with a cartridge dust collector, exhausting to the interior, capacity: 500 pounds per hour of copper-zinc and magnesium ferrite, each.
- (u) Four (4) green bead screening units identified as B-GB-1, installed in 1984, equipped with a cartridge dust collector, exhausting to the interior, capacity: 500 pounds per hour of copper-zinc and magnesium ferrite, each.
- (v) One (1) wet ball milling operation, identified as B-WB-1, installed in 1980, equipped with a cartridge dust collector, exhausting to the interior, capacity: 10,000 pounds per batch (666.7 pounds per hour) of copper-zinc and magnesium ferrite beads.
- (w) One (1) ball mill operation, utilizing a wet batch process, identified as B-BM-1, installed in 1992, equipped with a cartridge dust collector, exhausting to the interior, capacity: 580 pounds per hour of copper-zinc and magnesium ferrite beads.

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

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

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

There are no proposed emission units 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) One (1) lab type pilot facility, identified as B-PS-1, which includes three (3) ball mills, a spray dryer (7 foot diameter), two (2) lab calciners, and three (3) small kilns.
- (b) One (1) heating boiler, identified as C-HB-1, exhausting through stack V-CHB-1, rated at 5.25 million British thermal units per hour. [326 IAC 6-2-2].
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour which include:
  - (1) Three (3) air makeup units with heat input ratings per unit of two (2) million British thermal units per hour.
  - (2) Eleven (11) space heaters with heat input ratings per unit of 0.3 million British thermal units per hour.
  - (3) One (1) space heater with a heat input rating per unit of 0.03 million British thermal units per hour.
  - (4) Two (2) space heaters with heat input ratings per unit of 0.33 million British thermal units per hour.

- (5) One (1) air heater with a heat input rating of 2.475 million British thermal units per hour.
  - (6) Eleven (11) space heaters with heat input ratings per unit of 0.3 million British thermal units per hour.
  - (7) Two (2) space heaters with heat input ratings per unit of 0.075 million British thermal units per hour.
  - (8) One (1) hot water heater with a heat input rating of 0.72 million British thermal units per hour.
  - (9) One (1) hot water heater with a heat input rating of 0.42 million British thermal units per hour.
  - (10) One (1) air makeup unit with a heat input rating of 1.65 million British thermal units per hour.
  - (11) Two (2) space heaters with heat input ratings per unit of 0.3 million British thermal units per hour.
  - (12) Three (3) space heaters with heat input ratings per unit of 0.075 million British thermal units per hour.
  - (13) One (1) space heater with a heat input rating of 0.625 million British thermal units per hour.
  - (14) One (1) space heater with a heat input rating of 0.938 million British thermal units per hour.
- (d) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 million British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour which includes one (1) 200 horsepower generator with a heat input of 0.680 million British thermal units per hour.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (h) Cleaners and solvents characterized as follows:
- (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters mercury; or 0.3 pounds per square inch measured at 38 degrees Celsius (100 degrees Fahrenheit) or;
  - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters mercury; or 0.1 pounds per square inch measured at 20 degrees Celsius (68 degrees Fahrenheit); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (i) Infrared cure equipment.
- (j) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.
- (k) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (m) Paved and unpaved road and parking with public access.
- (n) Blowdown for any of the following: sight glass, boiler, compressors; pumps; and cooling tower.
- (o) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].
- (p) Filter or coalescer media changeout.
- (q) A laboratory as defined in 326 IAC 2-7-11 (20)(C).

### Existing Approvals

The source has been operating under the previous Part 70 Operating Permit T 127-8479-00021 issued on December 16, 1998 and the following amendments and modifications:

- (a) SPM 127-12930-00021, issued on April 4, 2001;
- (b) Reopening 127-13451-00021, issued on February 19, 2002; and
- (c) AA 127-16177-00021, issued on July 25, 2002.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this proposed permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised or added in this Part 70 Operating Permit:

- (a) IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Condition B.12 (Preventive Maintenance Plan) from T 127-8479-00021, issued on December 16, 1998.
- (b) IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan (Condition C.14

from T 127-8479-00021, issued on December 16, 1998) with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated.

- (c) All references to the condition entitled, Compliance Response Plan - Preparation, Implementation, Records, and Reports, have been revised to reflect the new condition title, Response to Excursions or Exceedances.
- (d) IDEM has determined that once per day monitoring of visible emission notations is generally sufficient to ensure proper operation of the ferrite bead manufacturing operations stack exhausts. IDEM has also determined that monitoring this parameter once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6.
- (e) Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, a new condition, entitled, Credible Evidence, reflecting this rule will be incorporated into Section B of the permit.
- (f) Paragraph (a) of Conditions D.1.5 and D.5.10 (Broken or Failed Baghouse) have been deleted from T 127-8479-00021, issued on December 16, 1998. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.1.5 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

Paragraph (b) of this condition has been revised for those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of baghouse failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this proposed Part 70 Operating Permit:

- (a) Since the requirements of Condition C.6 (Operation of Equipment) from T 127-8479-00021, issued on December 16, 1998, have been incorporated in the D Section, Condition C.6 has been removed from the permit.
- (b) The ferrite bead coating line, identified as C-FB-1, has been removed from the site location. Therefore, Section D.4 from T 127-8479-00021, issued on December 16, 1998, has been deleted.
- (c) From T 127-8479-00021, issued on December 16, 1998, Sections D.1 through D.3 have been combined into Section D.1. Therefore, Sections D.2 and D.3 have been deleted and Section D.5 has been renumbered as D.2.

### **Air Pollution Control Justification as an Integral Part of the Process**

The following justification was incorporated into this permit from the previous Part 70 Operating Permit:

All particulate matter emissions are made up of the product that Powder Processing Technology, LLC is producing (not waste) and therefore, it is in their best interest to capture and reprocess as much of the product as possible using the existing dust collectors. The cost of the capturing and reprocessing of the PM emissions is considerably less than the cost of purchasing new product which are the PM emissions.

IDEM, OAQ had previously evaluated this justification and agreed that the dust collectors are considered as an integral part of the manufacturing processes (excluding the 5-foot by 40-foot direct-fired calciner, identified as B-C-1, because the control device for this unit was installed at a later date to comply with 326 IAC 6-3-2). Therefore, the permitting level will be determined using the potential emissions after the dust collectors. Operating conditions in the proposed permit will specify that all dust collectors shall operate at all times when the manufacturing processes are in operation.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 Operating Permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 Operating Permit renewal application for the purposes of this review was received on February 25, 2003, with additional information received on November 16, 2005.

### **Emission Calculations**

See pages 1 through 6 of Appendix A of this document for detailed emission calculations.

### **Potential to Emit of the Source**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

The source was issued a Part 70 Operating Permit on December 16, 1998. 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 the original Part 70 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 (tons/yr)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Ferrite Bead Manufacturing Operations	14.8	14.8	-	-	-	-	1.38
Insignificant Activities	5.25	5.99	0.071	0.991	10.8	21.0	0.217
Total Emissions	20.1	20.8	0.071	0.991	10.8	21.0	1.60

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and NO<sub>x</sub> is less than twenty five (25) tons per year and all remaining criteria pollutants are less than one hundred (100) tons per year. Yet, the source has elected to remain subject to Part 70 rules in the event that the source proposes to install new equipment. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Yet, the source has elected to remain subject to Part 70 rules in the event that the source proposes to install new equipment. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) 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 particulate matter (PM) and volatile organic compound (VOC) 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 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	-
PM <sub>10</sub>	2.00
SO <sub>2</sub>	0.055
VOC	0.508
CO	3.00
NO <sub>x</sub>	3.00
HAP	-

### County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM <sub>2.5</sub>	Nonattainment
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-Hour Ozone	Severe Nonattainment
8-Hour Ozone	Moderate Nonattainment
CO	Attainment
Lead	Attainment

- (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. Porter 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 - Entire Source section of this document.
- (2) VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Porter 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 of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.
- (b) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Porter 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 lawsuit 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 a surrogate for PM<sub>2.5</sub> emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Porter County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

### **Part 70 Operating Permit Conditions**

This source has elected to be subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 Operating Permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### **Federal Rule Applicability**

- (a) This source does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for all criteria pollutants:
  - (1) with the potential to emit before controls equal to or greater than the major source threshold for all criteria pollutants,
  - (2) that is subject to an emission limitation or standard for all criteria pollutants, and
  - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

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

- (b) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60 Subpart Dc) are not included in the permit for the natural gas fired boiler, rated at 5.25 million British thermal units per hour, identified as C-HB-1, because it has an input heat capacity less than ten (10) million British thermal units per hour.
- (c) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (d) The (1) one natural gas-fired boiler, identified as C-HB-1, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD because this source is not a major source of HAPs, as defined in 40 CFR 63.2.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63 included in the permit for this source.

### **State Rule Applicability – Entire Source**

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

The unrestricted potential VOC and NO<sub>x</sub> emissions of the entire source are less than twenty five (25) tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-3, Emission Offset.

### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

Pursuant to T 127-8479-00021, issued on December 16, 1998, IDEM, OAQ determined that the potential to emit of PM/PM<sub>10</sub> shall be determined after controls. The potential to emit of PM/PM<sub>10</sub> for all emission units before the applicability date of 1977 is 12.7 tons per year. The potential to emit for PM/PM<sub>10</sub> after the applicability date of 1977 is 6.58 tons per year and for insignificant activities is less than six (6) tons per year. Therefore, the unrestricted potential emissions of each attainment criteria pollutant are less than two hundred-fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of a reprographic ferrite bead manufacturing source will emit less than ten (10) tons per year of a single HAP and twenty five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

This source which is located in Porter County is not subject to 326 IAC 2-6 (Emission Reporting) because it does not have the potential to emit greater than twenty-five (25) tons per year of NO<sub>x</sub> and does not emit five (5) tons per year or more of lead and does not require a Part 70 permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

### 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 the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

## State Rule Applicability – Individual Facilities

### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to T 127-8479-00021, issued on December 16, 1998, and 326 IAC 6-3-2, the particulate from the ferrite bead manufacturing operations shall be limited as follows:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

<b>Process</b>	<b>Process Weight (tons per year)</b>	<b>Allowable PM Emission Rate (pounds per hour)</b>	<b>Controlled Emission Rate (pounds per hour)</b>
Direct fired calciners (A-CS-3 & 4)	0.30, each	1.83, each	1.62, total
Indirect fired calciner (A-CS-2)	0.80	3.53	0.226
20-foot dryer (A-SD-1)	1.75	5.97	0.363
Blending/packageging operations (A-BL-1)	1.00	4.10	0.001
Bulk handling (A-BH-1)	0.80	3.53	0.002
Six (6) ball milling units (A-BM-1 to A-BM-6)	0.25, each	1.62, each	0.003, total
Ball milling unit (A-BM-7)	0.70	3.23	0.754
Six (6) green bead screening units (A-GB-1)	0.25, total	1.62, total	0.002, total
Fire-bead screening unit (A-FB-1)	0.25	1.62	0.002
Weigh up units (A-WU-1)	1.50	5.38	0.035
Direct-fired rotary calciner (B-C-1)	0.75	3.38	0.005
Spray dryer (B-SD-1)	1.25	4.76	0.150
Three (3) fire bead screening units (B-FB-1)	0.75, total	3.38, total	0.000008, total
Four (4) green bead screening units (B-GB-1)	1.00, total	4.10, total	0.000008, total
Wet ball milling (B-WB-1)	0.333	1.96	0.000008
Ball mill operation (B-BM-1)	0.29	1.70	0.00001
Spray dryer (B-SD-2)	0.29	1.79	0.055
Spray dryer (C-SD-1)	0.75	3.38	0.120
Four (4) green bead screening units (C-GB-1)	1.00, total	4.10, total	0.008, total
Sagger weigh-up unit (C-WU-1)	1.40	5.14	0.006
Indirect calciner (C-CS-6)	0.80	3.53	0.005
Indirect calciner (C-CS-7)	0.80	3.53	0.005
Fire bead screening area (C-GB-2)	0.25	1.62	0.005

As shown in the preceding table, all facilities comply with the allowable particulate emission rates pursuant to this rule. Since IDEM, OAQ has determined that the control devices are integral to this process the baghouses, cyclones, and cartridge dust collectors shall be in operation at all times the ferrite bead manufacturing operations are in operation.

### State Rule Applicability –Insignificant Activities

326 IAC 6-2-2 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(a))

Pursuant to 326 IAC 6-2-2(a) the PM emissions from the boiler, identified as C-HB-1, shall not exceed 0.60 pounds per million British thermal units of heat input.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to T 127-8479-00021, issued on December 16, 1998, and 326 IAC 6-3-2, the particulate from the grinding and machining operations shall be limited by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

### Testing Requirements

There are no proposed testing requirements because all emission calculations are based from AP-42 emission factors.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in 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:

The ferrite bead manufacturing operations, identified as A-CS-3, A-CS-4, A-CS-2, A-SD-1, A-BM-7, A-GB-1, A-FB-1, A-WU-1, B-C-1, B-SD-1, B-SD-2, C-SD-1, C-GB-1, C-WU-1, C-CS-6, C-CS-7 and C-GB-2 have applicable compliance monitoring conditions as specified below:

- (a) Visible emission notations of the ferrite bead manufacturing stacks 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. 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

- (b) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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). For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the ferrite bead manufacturing operations. 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).

Bag failure can be indicated by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

- (c) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the PM control devices for the ferrite bead manufacturing processes must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2-7 (Part 70).

## Conclusion

The operation of this reprographic ferrite bead manufacturing source shall be subject to the conditions of this Part 70 Operating Permit T 127-17568-00021.

**Appendix A: Emission Calculations  
Baghouse Operations**

**Company Name: Powder Processing Technology, LLC  
Address City IN Zip: 5103 Evans Road, Valparaiso, Indiana 46383  
Part 70: T 127-17568  
Plt ID: 127-00021  
Reviewer: Brian J. Pedersen  
Date: February 25, 2003**

Control ID	Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)	HAPS Emissions
									after Controls Nickel (tons/yr)
A-DC-1 (a)	A-CS-3 & 4	95.5%	0.086	2200	36.0	158	1.62	7.10	0.710
A-DC-1 (b)	A-CS-2	95.5%	0.012	2200	5.03	22.0	0.226	0.991	0.099
A-SD-1 (c)	A-SD-1	99.9%	0.005	8450	363	1589	0.363	1.59	0.159
A-BL-1	A-BL-1	99.9%	0.00002	5400	1.02	4.46	0.001	0.004	0.000
A-BH-1	A-BH-1	99.9%	0.00005	5400	2.45	10.7	0.002	0.011	0.001
A-BM-1-6	A-BM-1-6	99.9%	0.00005	6000	2.67	11.7	0.003	0.012	0.001
A-BM-7	A-BM-7	99.9%	0.040	2200	754	3304	0.754	3.30	0.330
A-GB-1	A-GB-1	99.9%	0.00005	5400	2.45	10.7	0.002	0.011	0.000
A-FB-1	A-FB-1	99.9%	0.00005	5400	2.45	10.7	0.002	0.011	0.000
A-WU-1	A-WU-1	99.9%	0.002	2200	34.5	151	0.035	0.151	0.015
B-C-1	B-C-1	99.9%	N/A	N/A	4.50	19.7	0.005	0.020	0.00
B-SD-1	B-SD-1	99.9%	0.008	2230	150	657	0.150	0.657	0.00
B-FB-1	B-FB-1	99.9%	0.0000003	3800	0.008	0.036	0.000008	0.00004	0.00
B-GB-1	B-GB-1	99.9%	0.0000003	3800	0.008	0.036	0.000008	0.00004	0.00
B-WB-1	B-WB-1	99.9%	0.0000003	3800	0.008	0.036	0.000008	0.00004	0.00
B-BM-1	B-BM-1	99.9%	0.0000001	10000	0.008	0.035	0.00001	0.00003	0.00
B-SD-2	B-SD-2	99.9%	0.001	4400	55.1	241	0.055	0.241	0.00
C-SD-1	C-SD-1	99.9%	0.003	5200	120	527	0.120	0.527	0.053
C-GB-1	C-GB-1	99.9%	0.0002	5200	8.02	35.1	0.008	0.035	0.004
C-WU-1	C-WU-1	99.9%	0.0002	3900	6.02	26.4	0.006	0.026	0.003
C-CS-6	C-CS-6	99.9%	0.0002	3900	5.01	22.0	0.005	0.022	0.002
C-CS-7	C-CS-7	99.9%	0.0002	3900	5.01	22.0	0.005	0.022	0.002
C-GB-2	C-GB-2	99.9%	0.0002	3500	5.01	21.9	0.005	0.022	0.002
<b>Totals</b>						<b>6845</b>		<b>14.8</b>	<b>1.38</b>

**Methodology**

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

HAPs based on 10% of PM as Nickel

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Small Industrial Boiler  
Company Name: Powder Processing Technology, LLC  
Address City IN Zip: 5103 Evans Road, Valparaiso, Indiana 46383  
Permit Number: T 127-17568  
Pit ID: 127-00021  
Reviewer: Brian J. Pedersen  
Application Date: February 25, 2003**

Heat Input Capacity  
MMBtu/hr  
(C-HB-1)  
5.25

Potential Throughput  
MMCF/yr  
46

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.044	0.175	0.014	2.30	0.126	1.93

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAPs Emissions**

**Company Name: Powder Processing Technology, LLC**  
**Address City IN Zip: 5103 Evans Road, Valparaiso, Indiana 46383**  
**Permit Number: T 127-17568**  
**Pit ID: 127-00021**  
**Reviewer: Brian J. Pedersen**  
**Application Date: February 25, 2003**

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.000048	0.000028	0.001725	0.041391	0.000078

HAPs - Metals						
	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	
Potential Emission in tons/yr	0.00001	0.00003	0.00003	0.00001	0.00005	<b>0.043</b>

Methodology is the same as page 2.

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

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**Company Name:** Powder Processing Technology, LLC  
**Address City IN Zip:** 5103 Evans Road, Valparaiso, Indiana 46383  
**Permit Number:** T 127-17568  
**Pit ID:** 127-00021  
**Reviewer:** Brian J. Pedersen  
**Application Date:** February 25, 2003

Unit ID	Individual Heat Input Capacity (MMBtu/hr)	# of Units	Total Heat Input Capacity (MMBtu/hr)
AM1-AM3	2.00	3	6.00
SH1-SH24	0.300	24	7.20
SH25	0.030	1	0.030
SH26,SH27	0.330	2	0.660
AM4	2.48	1	2.480
SH28, SH29	0.075	2	0.150
HW1	0.720	1	0.720
HW2	0.420	1	0.420
AM5	1.65	1	1.650
SH30-SH32	0.075	3	0.225
SH33	0.625	1	0.625
SH34	0.938	1	0.938
<b>Total</b>	<b>9.64</b>	<b>41</b>	<b>21.1</b>

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

21.1

185

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.176	0.702	0.055	9.242	0.508	7.763

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

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

See page 5 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Small Industrial Boiler**  
**HAPs Emissions**

**Company Name:** Powder Processing Technology, LLC  
**Address City IN Zip:** 5103 Evans Road, Valparaiso, Indiana 46383  
**Permit Number:** T 127-17568  
**Pit ID:** 127-00021  
**Reviewer:** Brian J. Pedersen  
**Application Date:** February 25, 2003

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.00210	Dichlorobenzene 0.00120	Formaldehyde 0.07500	Hexane 1.80000	Toluene 0.00340
Potential Emission in tons/yr	0.000194	0.000111	0.006931	0.166352	0.000314

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	<b>Total</b>
Potential Emission in tons/yr	0.00005	0.00010	0.00013	0.00004	0.00019	<b>0.174</b>

Methodology is the same as page 4.

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

**Appendix A: Emission Calculations  
Internal Combustion Engines - Natural Gas  
Turbine (200 HP)  
Reciprocating**

**Company Name:** Powder Processing Technology, LLC  
**Address City IN Zip:** 5103 Evans Road, Valparaiso, Indiana 46383  
**Permit Number:** T 127-17568  
**Plt ID:** 127-00021  
**Reviewer:** Brian J. Pedersen  
**Application Date:** February 25, 2003

**Emissions calculated based on heat input capacity (MMBtu/hr)**

Heat Input Capacity  
MM Btu/hr

0.680

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
0.010	0.0384	0.001	3.17	0.120	0.386	
Potential Emission in tons/yr	0.030	0.114	0.002	9.44	0.357	1.15

**Methodology**

Emission Factors are from AP42 (Supplement B 08/00), Table 3.2-1

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] \* 8760 hr/yr / (2,000 lb/ton )

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton )

\*PM emission factor (condensable) PM10 (filterable)