



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: March 10, 2006
RE: Republic Engineered Products, LLC / 089-17924-00157
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 according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. 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.

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

Enclosures
FNPER.dot 1/10/05



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

Mitchell E. Daniels, Jr.
 Governor

Thomas W. Easterly
 Commissioner

100 North Senate Avenue
 Indianapolis, Indiana 46204
 (317) 232-8603
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**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
 (FESOP)**

**Office of Air Quality
 and
 City of Gary Department of Environmental Affairs**

**Republic Engineered Products, Inc.
 2800 East Dunes Highway, Gary, IN 46402**

(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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

FESOP No.: 089-17924-00157

Issued by:
 Original signed by
 Paul Dubenetzky, Assistant Commissioner
 Office of Air Quality

Issuance Date: March 10, 2006

Expiration Date: March 10, 2011

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None
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- FESOP Quarterly Deviation and Compliance Monitoring Report Form**
- FESOP Vessel Reporting Form**

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary steel bar cold finishing plant.

Authorized individual:	Plant Manager or his or her duly authorized representative
Source Address:	2800 East Dunes Highway, Gary, IN 46402
Mailing Address:	2800 East Dunes Highway, Gary, IN 46402
General Source Phone:	219/886-8110
SIC Code:	3316 (Cold-Rolled Steel Sheet, Strip, and Bars) 331221 (under the NAICS Code)
Source Location Status:	Nonattainment for PM _{2.5} , SO ₂ , and ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules Minor Source, under Section 112 of the Clean Air Act Not 1 of 28 Listed Source Categories

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

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

- (a) Two (2) natural gas fueled annealing furnaces, identified as AF 7187 and AF 9800, with uncontrolled emissions exhausting inside the building.

There are no roof monitors/vents.

There are side wall vents for general ventilation.

- (1) Annealing furnace AF7187 has a maximum capacity of 6.5 million (MM) Btu per hour.

AF7187 is exhausted to the atmosphere through a roof vent by an exhaust fan.

- (2) Annealing furnace AF9800 has a maximum capacity of 15 MMBtu per hour.

AF9800 has eight (8) combustion zones, four (4) of which are vented to the atmosphere and four (4) of which are exhausted into the building.

A third annealing furnace is fueled by electricity, and has a maximum capacity of 1.6 MMBtu per hour. There are no regulated air emissions from this third annealing furnace (electric).

- (b) Three (3) enclosed shotblasters, identified as Multiblaster #1, Wheelbrator Skew Roll Shotblaster #2 and Pangborn Shotblaster #3. These enclosed shotblasters are used to mechanically clean the bars and remove the outer scales developed during annealing.
- (1) The Multiblaster #1 has a maximum capacity to clean 14,760 pounds of steel per hour.
- (2) The Wheelbrator Skew Roll Shotblaster #2 has a maximum capacity to clean 9,520 pounds of steel per hour.

The particulate emissions from the Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2 are controlled by an ultra web baghouse (identified as Torit 4-32), with specifications of 11,750 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust into the building.

- (3) The Pangborn Shotblaster #3 has a maximum capacity to clean 9,520 pounds of steel per hour.

The particulate emissions from the Pangborn Shotblaster #3 are controlled by an ultra web baghouse (identified as Torit 2-8), with specifications of 2,700 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust through a stack identified as Stack T2-8, horizontally from the east side of the building.

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

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

- (a) Fourteen (14) natural gas fueled space heaters, with a total capacity of 7.657 MM Btu per hour.
- (b) One (1) above ground fixed dome roof, 275-gallon tank that stores diesel fuel, having a diesel fuel usage of less than 1,000 gallons per year.
- (c) Source's roads and parking lot.

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

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

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

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B	GENERAL CONDITIONS
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B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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

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

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

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

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

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

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

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

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, and City of Gary Department of Environmental Affairs within a reasonable time, any information that IDEM, OAQ, and City of Gary Department of Environmental Affairs may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the

Permittee shall also furnish to IDEM, OAQ, and City of Gary Department of Environmental Affairs 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report, which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE, Gary, IN 46402

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

and City of Gary Department of Environmental Affairs on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and City of Gary Department of Environmental Affairs may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan (PMP) [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE
Gary, IN 46402

The PMP's extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, and City of Gary Department of Environmental Affairs upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and City of Gary Department of Environmental Affairs. IDEM, OAQ, and City of Gary Department of Environmental Affairs may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit.

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

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

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and City of Gary Department of Environmental Affairs, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027
(ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

and

IDEM Northwest Regional Office
Telephone No.: 219-757-0265
Facsimile No.: 219-757-0267

- (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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE
Gary, IN 46402

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) 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 and City of Gary Department of Environmental Affairs, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ and City of Gary Department of Environmental Affairs, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (except for emergencies, which shall be reported as set forth in Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE
Gary, IN 46402

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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Quarterly Deviation and Compliance Monitoring Report shall be submitted within thirty (30) days of the end of the reporting period.

The first report shall cover the period commencing on the date of issuance of the original FESOP and shall end on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

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

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ and City of Gary Department of Environmental Affairs determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ and City of Gary Department of Environmental Affairs, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ and City of Gary Department of Environmental Affairs, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ and City of Gary Department of Environmental Affairs, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and City of Gary Department of Environmental Affairs and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

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

Request for renewal shall be submitted to:

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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE
Gary, IN 46402

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and City of Gary Department of Environmental Affairs on or before the date it is due.
- (2) If IDEM, OAQ and City of Gary Department of Environmental Affairs upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and City of Gary Department of Environmental Affairs takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in

writing by IDEM, OAQ and City of Gary Department of Environmental Affairs, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE
Gary, IN 46402

Any such application shall be certified by the [authorized individual] as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions, which exceed the 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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE
Gary, IN 46402

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 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review. Such records shall consist of all of the information required to be submitted in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade 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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

Pursuant to 326 IAC 2-8-15(d), the Permittee may request that the FESOP be revised to include an alternative operating scenario in accordance with the provisions of 326 IAC 2-8-11.1(f).

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

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE, Gary, IN 46402

The application, which shall be submitted by the Permittee, does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

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

Pursuant to 326 IAC 2-8-16(b), for sources that submit an application for a FESOP after December 31, 1995, the Permittee shall not be assessed an annual operating fee in the billing cycle immediately following issuance of this FESOP, but shall be assessed the annual fee in subsequent billing cycles.

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any regulated pollutant from the entire source, except volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
 - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21).

The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE
Gary, IN 46402

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

- (a) When required in order to determine compliance with an applicable emission limitation or as required by this FESOP, 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.

When required in order to determine compliance with an applicable emission limitation or as required by this FESOP, 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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE
Gary, IN 46402

no later than thirty-five (35) days prior to the intended test date.

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and City of Gary Department of Environmental Affairs not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and City of Gary Department of Environmental Affairs, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented 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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE
Gary, IN 46402

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

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

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

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

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

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

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

C.12 Risk Management Plan (RMP) [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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.14 Actions Related to Noncompliance Demonstrated by a Stack Test
[326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or City of Gary Department of Environmental Affairs makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or City of Gary Department of Environmental Affairs 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.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE
Gary, IN 46402

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

considered timely if received by IDEM, OAQ, and City of Gary Department of Environmental Affairs on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period.

All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Two (2) natural gas fueled annealing furnaces, identified as AF 7187 and AF 9800, with uncontrolled emissions exhausting inside the building.

There are no roof monitors/vents.

There are side wall vents for general ventilation.

(1) Annealing furnace AF7187 has a maximum capacity of 6.5 million (MM) Btu per hour.

AF7187 is exhausted to the atmosphere through a roof vent by an exhaust fan.

(2) Annealing furnace AF9800 has a maximum capacity of 15 MMBtu per hour.

AF9800 has eight (8) combustion zones, four (4) of which are vented to the atmosphere and four (4) of which are exhausted into the building.

A third annealing furnace is fueled by electricity, and has a maximum capacity of 1.6 MMBtu per hour. There are no regulated air emissions from this third annealing furnace (electric).

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

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

D.1.1 Natural Gas Usage [326 IAC 6.8-6-1] [326 IAC 2-8]

Pursuant to 326 IAC 6.8-6-1 (Lake County: Combustion Sources: Natural Gas) and 326 IAC 2-8 (FESOP), Annealing Furnaces AF7187 and AF9800 shall fire natural gas only.

Compliance Determination Requirements

D.1.2 Natural Gas Fuel Specifications [326 IAC 2-8]

To show compliance with the natural gas usage specified in Conditions D.1.1 - Natural Gas Usage, the Permittee shall use pipeline natural gas that is a naturally occurring fluid mixture of hydrocarbons (e.g., methane, ethane, or propane) produced in geological formations beneath the Earth's surface that maintains a gaseous state at a standard atmospheric temperature and pressure under ordinary conditions, and which is provided by supplier through a pipeline.

Natural gas does not include the following gaseous fuels:

- landfill gas,
- digester gas,
- refinery gas,
- sour gas,
- blast furnace gas,
- coal-derived gas,

- - producer gas,
- - coke oven gas, or
- - any gaseous fuel produced in a process, which might result in highly variable sulfur content or heating value.

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

None

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

None

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Three (3) enclosed shotblasters, identified as Multiblaster #1, Wheelbrator Skew Roll Shotblaster #2 and Pangborn Shotblaster #3. These enclosed shotblasters are used to mechanically clean the bars and remove the outer scales developed during annealing.

- (1) The Multiblaster #1 has a maximum capacity to clean 14,760 pounds of steel per hour.
- (2) The Wheelbrator Skew Roll Shotblaster #2 has a maximum capacity to clean 9,520 pounds of steel per hour.

The particulate emissions from the Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2 are controlled by an ultra web baghouse (identified as Torit 4-32), with specifications of 11,750 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust into the building.

- (3) The Pangborn Shotblaster #3 has a maximum capacity to clean 9,520 pounds of steel per hour.

The particulate emissions from the Pangborn Shotblaster #3 are controlled by an ultra web baghouse (identified as Torit 2-8), with specifications of 2,700 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust through a stack identified as Stack T2-8, horizontally from the east side of the building.

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

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

D.2.1 Particulate Matter (PM) Limit [326 IAC 6.8-1-2]

- (a) Pursuant to 326 IAC 6.8-1-2(a)(Particulate Matter Limitations For Lake County), the particulate matter (PM) emissions from the Torit 4-32 baghouse shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.
- (b) Pursuant to 326 IAC 6.8-1-2(a)(Particulate Matter Limitations For Lake County), the particulate matter (PM) emissions from Torit 2-8 baghouse shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

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

- (a) The PM emissions from the Torit 4-32 baghouse, controlling the emissions from Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2, shall not exceed 3.0 pounds of PM per hour.
- (b) The PM emission from the Torit 2-8 baghouse, controlling the emissions from Pangborn Shotblaster #3, shall not exceed 1.0 pound of PM per hour.

Compliance with these limits makes 326 IAC 2-2 Prevention of Significant Deterioration (PSD) not applicable.

D.2.3 Particulate Matter with aerodynamic diameter of less than or equal to 10 micrometers (PM₁₀) Limit [326 IAC 2-8] [326 IAC 2-2]

Pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit):

- (a) the filterable and condensible PM₁₀ emissions from the Torit 4-32 baghouse, controlling the emissions from Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2, shall not exceed 3.0 pounds of filterable and condensible PM₁₀ per hour.
- (b) the filterable and condensible PM₁₀ emissions from the Torit 2-8 baghouse, controlling the emissions from Pangborn Shotblaster #3, shall not exceed 1.0 pound of filterable and condensible PM₁₀ per hour.

Compliance with these limits makes 326 IAC 2-2 Prevention of Significant Deterioration (PSD) and 326 IAC 2-7 (Part 70) not applicable.

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

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan (PMP), of this permit, is required for the baghouses.

Compliance Determination Requirements

D.2.5 Particulate Control Operation [326 IAC 2-8]

Except as otherwise provided by statute, rule or in this FESOP, the baghouses (identified as Torit 4-32 and Torit 2-8) shall be in operation and control the particulate emissions from the shotblasters at all times when any of the shotblasters are in operation.

D.2.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) During the period between 30 and 36 months after the issuance of this FESOP, the Permittee shall perform PM and PM₁₀ testing for one of the two (2) baghouses (identified as Torit 4-32 and Torit 2-8) controlling the shotblasters, utilizing methods specified in 40 CFR Part 51, Appendix M or other methods as approved by the Commissioner.

PM₁₀ includes filterable and condensible PM₁₀.

- (b) This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.
- (c) Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.2.7 Visible Emissions Notations [326 IAC 2-8]

- (a) Visible emission notations of the baghouse stack (identified as Stack T2-8) exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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.2.8 Baghouse Parametric Monitoring [326 IAC 2-8]

The Permittee shall record the pressure drop across the:

- (a) baghouse (identified as Torit 4-32) used in conjunction with the Multiblasters #1 and Wheelbrator Skew Roll Shotblaster #2; and
 - (b) baghouse (identified as Torit 2-8) used in conjunction with the Pangborn Shotblaster #3,
- at least once per day when these shotblasters are in operation when venting to the atmosphere.

When for any one reading, the pressure drop across the baghouses is outside the normal range of:

- (a) 2.0 and 8.0 inches of water for baghouse Torit 4-32,
- (b) 2.0 and 8.0 inches of water for baghouse Torit 2-8,

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.

A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.9 Broken or Failed Bag Detection [326 IAC 2-8]

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).

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

D.2.10 Record Keeping Requirements [326 IAC 2-8]

- (a) To document compliance with Conditions D.2.7 - Visible Emissions Notations, and D.2.8 - Baghouse Parametric Monitoring, the Permittee shall maintain records of the following and make such records available to IDEM, OAQ; City of Gary Department of Environmental Affairs; and the US EPA, upon request:
 - (i) the once per day visible emission notations of the baghouses stack exhaust, and
 - (ii) the once per day readings of the pressure drop across the baghouses.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:	Insignificant Activities
(1)	Fourteen (14) natural gas fueled space heaters, with a total capacity of 7.657 MMBtu per hour.
(2)	One (1) above ground fixed dome roof, 275-gallon tank that stores diesel fuel, having a diesel fuel usage of less than 1,000 gallons per year.
(3)	Source's roads and parking lot.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]
None

Compliance Determination Requirements
None

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
None

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

D.3.1 Vessel Record Keeping [326 IAC 8-9-6(b)]

-
- (a) Pursuant to 326 IAC 8-9-6(b), the Permittee shall maintain a record containing the following information for each vessel:
 - (i) the vessel identification number
 - (ii) the vessel dimensions and
 - (iii) the vessel capacity
 - (b) Pursuant to 326 IAC 8-9-6(a), the record shall be maintained for the life of the vessel.

D.3.2 Vessel Record Reporting [326 IAC 8-9-6(a)]

Pursuant to 326 IAC 8-9-6(a), the Permittee shall submit a report containing the information in Condition D.3.1 - Vessel Record Keeping, to the address listed in Section C - General Reporting Requirements, of this permit using the reporting form at the end of this permit or its equivalent.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality**

100 North Senate Avenue, Indianapolis, Indiana 46204

and

City of Gary Department of Environmental Affairs

839 Broadway Street, 2nd Floor NE, Gary, IN 46402

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

Source Name:	Republic Engineered Products. Inc.
Source Location:	2800 East Dunes Highway, Gary, IN 46402
Mailing Address:	2800 East Dunes Highway, Gary, IN 46402
Source General Telephone Number:	219/886-8110
Responsible Official:	Plant Manager or his or her duly authorized representative

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 (specify the year being certified)
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:
Telephone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
100 North Senate Avenue, Indianapolis, Indiana 46204
and
City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE, Gary, IN 46402

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Republic Engineered Products. Inc.
Source Location: 2800 East Dunes Highway, Gary, IN 46402
Mailing Address: 2800 East Dunes Highway, Gary, IN 46402
Source General Telephone Number: 219/886-8110
Responsible Official: Plant Manager or his or her duly authorized representative

This form consists of 2 pages

Page 1 of 2

<p>This is an emergency as defined in 326 IAC 2-7-1(12)</p> <p><input 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</p> <p><input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) working days</p> <p>(Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. Compliance Branch, Phone: 317-233-5674, Fax: 317-233-5967, 100 North Senate Avenue, Indianapolis, Indiana 46204</p>

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:

Page 2 of 2 of Emergency Occurrence Report

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

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed By:
Title/Position:
Date:
Telephone:

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality, Compliance Data Section
100 North Senate Avenue, Indianapolis, Indiana 46204
and
City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE, Gary, IN 46402

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

Source Name: Republic Engineered Products, Inc.
Source Location: 2800 East Dunes Highway, Gary, IN 46402
Mailing Address: 2800 East Dunes Highway, Gary, IN 46402
Source General Telephone Number: 219/886-8110
Responsible Official: Plant Manager or his or her duly authorized representative

Months: _____ to _____ Year: _____

This form consists of 2 pages

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2 of Quarterly Deviation And Compliance Monitoring Report

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

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

Form Completed By:
Title/Position:
Date:
Telephone:

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality, Compliance Data Section
100 North Senate Avenue, Indianapolis, Indiana 46204
and
City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE, Gary, IN 46402

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
VESSEL REPORT

Source Name:	Republic Engineered Products. Inc.
Source Location:	2800 East Dunes Highway, Gary, IN 46402
Mailing Address:	2800 East Dunes Highway, Gary, IN 46402
Source General Telephone Number:	219/886-8110
Responsible Official:	Plant Manager or his or her duly authorized representative

Please specify the units.

Vessel identification number:

Vessel dimensions:

Vessel capacity:

Form Completed By:
Title/Position:
Date:
Telephone:

Attach a signed certification to complete this report.

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

**Technical Support Document (TSD)
Federally Enforceable State Operating Permit (FESOP)**

Source Background and Description
--

Source Name:	Republic Engineered Products (REP) - - Gary Dunes Plant
Source Location:	2800 East Dunes Highway, Gary, IN 46402
Mailing Address:	401 Rose Avenue S.E., Massillon, OH 44646
Source General Telephone Number:	219/886-8110
Responsible Official:	Plant Manager
County:	Lake
SIC Code:	3316 (Cold-Rolled Steel Sheet, Strip, and Bars) 331221 (under the NAICS Code)
Source Categories:	Not 1 of the 28 source categories Minor PSD Source Minor EO Source Minor Source, CAA Section 112
Permit No.:	089-17924-00157
Permit Reviewer:	Iryn Calilung 317/233-5692

History

On May 30, 2003, the City of Gary Department of Environmental Affairs informed Republic Engineered Products (REP) that it needed to apply for an air approval, pursuant to 326 IAC 2.

On August 28, 2003, Republic Engineered Products (REP) submitted an application for an air permit to the Indiana Department of Environmental Management (IDEM) to operate their cold steel bar finishing plant. The finishing plant consists of turning, straightening, grinding, annealing, polishing, and cutting of the bars. The hot rolled bar stocks processed in this plant are mainly from other mills owned by REP, such as the plant located in Ohio. The hot rolled bar stocks are inspected, blasted, turned, straightened, ground, annealed, cut, sheared or polished depending on the customers' specifications.

Source Determination

Republic Engineered Steels, Inc. previously owned and operated two (2) plants in Gary, Indiana which are approximately two (2) miles apart:

- (a) Dunes Gary Plant - - located at 2800 East Dunes Highway, Gary, IN 46402; and
- (b) 7th Avenue Finishing Plant - - located at 4000 East 7th Avenue, Gary, IN 46402.

This application and review deals with the Dunes Gary Plant only, because:

- (a) The 7th Avenue Finishing Plant is not owned by Republic Engineered Products (REP); and
- (b) This finishing plant is currently not in operation.

Emission Units

The steel bar cold finishing plant consists of the following equipment:

- (a) ten (10) mechanically pressurized strengtheners,
- (b) three (3) turning machines,
- (c) three (3) shotblasters,
- (d) three (3) drawbench machines,
- (e) three (3) grinders,
- (f) five (5) saws,
- (g) two (2) polishers,
- (h) two (2) testers,
- (i) two (2) natural gas fueled annealing furnaces,
- (j) one (1) electric annealing furnaces, and
- (k) fourteen (14) natural gas fueled space heaters.

This review is limited to the units that have the potential to emit air pollutants:

- (a) Two (2) natural gas fueled annealing furnaces, identified as AF 7187 and AF 9800, with uncontrolled emissions exhausting inside the building. There are no roof monitors/vents. There are side wall vents for general ventilation.
 - (1) Annealing furnace AF7187 has a maximum capacity of 6.5 million (MM) Btu per hour.
 - (2) Annealing furnace AF9800 has a maximum capacity of 15 MMBtu per hour.

A third annealing furnace is fueled by electricity, and has a maximum capacity of 15 MMBtu per hour. There are no regulated air emissions from this third annealing furnace (electric).

- (b) Three (3) enclosed shotblasters, identified as Multiblaster #1, Wheelbrator Skew Roll Shotblaster #2 and Pangborn Shotblaster #3. These enclosed shotblasters are used to mechanically clean the bars and remove the outer scales developed during annealing.
 - (1) The Multiblaster #1 has a maximum capacity to clean 14,769 pounds of steel per hour.
 - (2) The Wheelbrator Skew Roll Shotblaster #2 has a maximum capacity to clean 9,520 pounds of steel per hour.

The particulate emissions from the Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2 are controlled by an ultra web baghouse (identified as Torit 4-32), with specifications of 11,750 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust through a stack identified as Stack T4-32.

- (3) The Pangborn Shotblaster #3 has a maximum capacity to clean 9,520 pounds of steel per hour.

The particulate emissions from the Pangborn Shotblaster #3 are controlled by an ultra web baghouse (identified as Torit 2-8), with specifications of 3,750 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust through a stack identified as Stack T2-8.

- (c) Fourteen (14) natural gas fueled space heaters, with a total capacity of 7.657 MMBtu per hour. These space heaters are considered insignificant activities, pursuant to 326 IAC 2-7-21.
- (d) One (1) above ground fixed dome roof, 275-gallon tank that stores diesel fuel. This tank has an annual throughput of 750 gallons of diesel per year. This tank is considered insignificant activity, pursuant to 326 IAC 2-7-21.

Emission Calculations

- (1) Potential to emit (PTE) from the two (2) annealing furnaces are due to the fuel combustion of natural gas. These annealing furnaces use pipeline natural gas as fuel. There are no regulated air emissions from the third annealing furnace (electric).
- (2) Potential to emit from the space heaters are due to the fuel combustion of natural gas. These space heaters use pipeline natural gas as fuel.
- (3) The total heating capacity of the space heaters and annealing furnaces is 29.2 MMBtu per hour.
- (4) Potential to emit from the three (3) shotblasters are determined by using the flow rate, grain loading and efficiency of the two (2) baghouses.
- (5) Emission calculations were not necessary for the insignificant activities because the status of the source remains the same.
- (6) The fugitive emissions calculations (see Attachment A) were provided by REP as part of their application.

Table 1 - - Annealing Furnaces and Space Heaters Potential Emissions		
Pollutant	Emission Factor (lbs/MMCF)	Potential To emit (tons/year)
PM	1.9	0.2
PM ₁₀	7.6	1.0
SO ₂	0.6	0.1
NO _x	100	12.8
VOC	5.5	0.7
CO	84	10.7

Maximum Capacity = 29.2 MMBtu per hour

Emission factors are from AP-42, Chapter 1.4.

Potential to Emit = (Maximum Capacity 29.2 MMBtu/hour)*(1 MMCF/1000
MMBtu)*(Emission Factor lbs/MMCF)*(8760 hours/year)*(1 ton/2000 lbs)

Table 2 - - Shotblasters PM and PM ₁₀ Potential Emissions				
Shotblaster Baghouse	Flow rate (acfm)	Grain Loading (gr/scf)	PTE Before Control (tons/year)	PTE After Control (tons/year)
Multiblaster #1	11,750	0.03	1,323.0	13.23
Wheelbrator #2				
Pangborn #3	3,750	0.03	4,220.0	4.22
Efficiency of the baghouses: 99.9%				
PM/PM ₁₀ After Control = (Flow rate acfm)*(Grain Loading gr/scf)*(1/7000 grains)*(60 minutes/hour)*(8760 hours/year)*(1 ton/2000 lbs)				
PM/PM ₁₀ Before Control = (PTE After Control)/(1-control efficiency %)				

Potential to Emit

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

Table 3 - - PTE Before Control	
Pollutant	(tons/year)
PM	greater than 250
PM ₁₀	greater than 250
SO ₂	less than 40
NOx	less than 25
VOC	less than 25
CO	less than 100
Single HAP	less than 10
Total HAPs	less than 25

- (1) Particulate Matter with aerodynamic of diameter less than or equal to 10 micrometers (PM₁₀)
 For the purposes of determining Part 70 applicability under 326 IAC 2-7 for particulate, PM₁₀, not PM, is the regulated pollutant in consideration.
- (2) Limited PM₁₀
 The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀ are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 (Part 70 Operating Permit) . However, the source opted to operate under the Federally Enforceable State Operating Permit (FESOP) program 326 IAC 2-8.

- (3) Particulate Matter (PM)
 PM is assumed to be equal to PM₁₀.
- (4) Sulfur Dioxide (SO₂), Volatile Organic Compound (VOC) , and Carbon Monoxide (CO)
 The PTE of SO₂, VOC, and CO are less than the exemption levels, specified in 326 IAC 2-1.1.
- (5) Hazardous Air Pollutants (HAPs)
 The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit of a combination HAPs is less than twenty-five (25) tons per year.

Limited Potential to Emit

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit (see Tables 1 and 2 for the detailed calculations).

Table 4 - - PM and PM ₁₀ Limited Potential to Emit		
Emission Unit/Control	PTE after control	
	(tons/year)	(pounds/hour)
Annealing Furnaces and Space Heaters	1.0	--
Multiblaster #1	13.23	3.02
Wheelbrator #2		
Pangborn #3	4.22	0.96
Fugitive Emissions	1.50	--
TOTAL	less than 100 tons/year	

- (1) Federally Enforceable State Operating Permit (FESOP)
 The PM₁₀ PTE of the entire plant is limited to less than 100 tons/year. Thus, the source can operate under 326 IAC 2-8 (FESOP). This will also make the entire plant a PSD minor source.
- (2) Prevention of Significant Deterioration (PSD)
 Compliance with the FESOP and PSD minor source status is by the use of the baghouses.
- (3) Compliance with FESOP and PSD
 The PTE after control are the rates based on the assumptions that the baghouses are going to control emissions at 99.99% control efficiency.

Existing Approvals and Source Status

- (1) Prior to this FESOP, no operating permit has been issued by IDEM for this source.
- (2) There are no actual emissions data for this source in the IDEM OAQ Emission Inventory database.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Nonattainment
SO ₂	Nonattainment
NO ₂	Attainment
1-hour ozone	Nonattainment
8-hour ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (1) Volatile Organic Compound (VOC) and Nitrogen Oxides (NOx)
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
 - (a) On January 26, 1996 in 40 CFR Part 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 NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
 - (b) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the

requirements for Emission Offset (326 IAC 2-3).

- (2) Sulfur Dioxide (SO₂)
Lake County has been classified as nonattainment for SO₂. Therefore, SO₂ emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (3) Particulate Matter with aerodynamic of diameter less than or equal to 10 micrometers (PM₁₀), Nitrogen Oxides (NO_x) and Carbon Monoxide (CO)
Lake County has been classified as attainment or unclassifiable for PM₁₀, NO₂, and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD) 326 IAC 2-2.
- (4) PM_{2.5}
Lake County has been classified as nonattainment for PM_{2.5}. The U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states and permitting agencies to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions.
- (5) Fugitive Emissions
The fugitive PM emissions are not counted toward determination of PSD applicability because this type of operation is not one of the 28 listed source categories under 326 IAC 2-2-1(gg)(1) and there are no applicable New Source Performance Standards that were in effect on August 7, 1980.

Federal Rule Applicability

- (1) New Source Performance Standards (NSPS) 40 CFR Part 60
 - (a) There are no NSPS included in the permit for this source.
 - (b) The source is not subject to 40 CFR 60 Subpart AAa, NSPS for EAF and AOD because there is no EAF or AOD at this plant.
 - (c) The storage tank is not subject to 40 CFR 60, Subpart Kb, because it has a capacity less than the applicable capacity of 10,000 gallons.
- (2) National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63
There are no NESHAP included in the permit for this source.
- (3) Section 112(j) of the Clean Air Act (CAA)
This finishing plant is a minor source for HAPs.
- (4) Compliance Assurance Monitoring (CAM) 40 CFR Part 64
40 CFR Part 64 does not apply to FESOP sources.

State Rule Applicability

- (1) 326 IAC 1-6-3 and 326 IAC 2-7-5(13) (Preventive Maintenance Plan (PMP))
A PMP is required for the three (3) shot blasters and two (2) baghouses. No PMP is required for the other units.
- (2) 326 IAC 2-2 Prevention of Significant Deterioration (PSD)
 - (a) The emissions after control of particulate matter (PM) and particulate matter with an aerodynamic diameter of less than or equal to 10 micrometers (PM₁₀) are limited to less than 250 tons/year; therefore the PSD requirements do not apply.
 - (b) The carbon monoxide (CO) potential to emit (PTE) is less than 250 tons/year; therefore the PSD requirements do not apply.
- (3) 326 IAC 2-3 Emission Offset (EO)
 - (a) The VOC PTE is less than 25 tons/year; therefore, the EO requirements do not apply.
 - (b) The SO₂ PTE is less than 100 tons/year; therefore, the EO requirements do not apply.
 - (c) The nitrogen oxides (NO_x) PTE is less than 100 tons/year; therefore, the EO requirements do not apply.
- (4) 326 IAC 2-6 (Annual Emission Reporting)
This finishing plant is not subject to the annual emission statement requirement because it is a source located in Lake County with NO_x and VOC potential to emit less than 25 tons/year.
- (5) 326 IAC 2-7 (Part 70) and 326 IAC 2-8 Federally Enforceable State Operating Permit (FESOP)
The PM₁₀ PTE is greater than 100 tons/year. The PM₁₀ emissions are limited to less than 100 tons/year. REP opted to operate under 326 IAC 2-8 (FESOP).
- (6) 326 IAC 5-1 (Opacity)
This source shall meet an opacity limit of 20% in any one 6-minute averaging period, pursuant to 326 IAC 5-1-2(2)(B) because it is not located within the area specified in 326 IAC 5-1-1(c)(4).
- (7) REP is not subject to the following rules, because they have been repealed.
 - (a) 326 IAC 6-1-1 (Nonattainment Area Limitations)
 - (b) 326 IAC 6-1-10.1 (Lake County PM₁₀ Emissions Requirements)
 - (c) 326 IAC 6-1-10.2 (Lake County PM₁₀ Coke Battery)
 - (d) 326 IAC 6-1-11.1 (Lake County Fugitive PM Control)
 - (e) 326 IAC 6-1-11.2 (Lake County PM Contingency Measures)
- (8) 326 IAC 6.5-1-1 (PM Limitations, Except Lake County)
This rule does not apply to REP because it is located in Lake county.
- (9) 326 IAC 6.8-1-1 (PM Limitations for Lake County)
REP is subject to this rule because it has a PM PTE of 100 tons or more per year or actual PM emissions of 10 tons or more per year.

Pursuant to 326 IAC 6.8-1-2(a)(Particulate Matter Limitations, Except Lake County), the particulate matter (PM) emissions from each baghouse (identified as Torit 4-32 and Torit 2-8) shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

The two (2) baghouses are capable of complying with this requirement.

- (10) 326 IAC 6.8-2 (Lake County: PM10 Emission Requirements)
REP is not subject to these rules because it is not one of the sources listed in 326 IAC 6.8-3 through 326 IAC 6.8-11.
- (11) 326 IAC 6.8-6-1 (Lake County: Combustion Sources: Natural Gas)
Pursuant to this rule, combustion sources located in Lake County shall fire natural gas only.
- (12) 326 IAC 6.8-10-1 (Lake County: Fugitive Particulate Matter)
REP is not subject to this rule because its fugitive particulate matter PTE is less than 5 tons per year.
- (13) 326 IAC 6-2 (Particulate Emissions Limitations for Indirect Heating)
This rule does not apply because there is no boiler at this plant.
- (14) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
This rule does not apply because PM limits are already established under 326 IAC 6.8.
- (15) 326 IAC 6-4 (Fugitive Dust Emissions)
Fugitive dust from this plant shall not escape beyond the property line or boundaries of the property, right of way, or easement on which the plant is located.
- (16) 326 IAC 7-1.1 (SO₂)
This rule does not apply because the SO₂ PTE is less than 25 tons/year.
- (17) 326 IAC 7-4-1.1 (Lake County SO₂)
This rule does not apply because the SO₂ PTE is less than 25 tons/year. However, REP is already using natural gas as fuel, which is the requirement under this rule.
- (18) 326 IAC 8 (VOC Rules)
Even though the plant is located in Lake County, 326 IAC 8 rules do not apply because:
 - (a) the VOC potential to emit is less than 10 tons per year. The actual VOC emissions are also less than 15 pounds per day.
 - (b) no wood surface coating is performed in the plant,
 - (c) no automobile refinishing is performed in the plant,
 - (d) no shipbuilding or ship repair is performed in the plant, and
 - (e) there is no sintering process in the plant.
- (19) 326 IAC 8-9-1 (VOL Storage Vessels)
This rule applies to the diesel fuel tank because it is located in Lake County, however, since the capacity is less than 39,000 gallons, only the record keeping and reporting requirements apply. The tank has a capacity of 275 gallons.
- (20) 326 IAC 9-1 (CO)
This rule does not apply because this plant does not contain the specific operations regulated under 326 IAC 9.

- (21) 326 IAC 10-1-1 (NOx Control in Clark and Floyd Counties)
This rule does not apply because this plant is not located in Clark or Floyd County.
- (22) 326 IAC 10-3 (NOx Reduction Program for Specific Source Categories)
This rule does not apply because this finishing plant is not one of the specific listed source categories.
- (23) 326 IAC 10-4-1 (NOx Budget Trading Program)
This rule does not apply because there is no electricity-generating unit in this plant.
- (24) 326 IAC 11 (Specific Types of Operations)
These rules do not apply because a steel finishing plant is not one of the listed specific types of operations.

Compliance Monitoring Requirements

- (1) The Baghouses shall be in operation at all times and control the emissions from the shotblasters to comply with the FESOP requirements.
- (2) Daily visible emission notations and pressure drop monitoring will be required to show continuous compliance.
- (3) There will be no compliance monitoring for the annealing furnaces because the emissions are mainly due to combustion of natural gas.
- (4) There will be no compliance monitoring required for the space heaters and tank because they are considered insignificant activities.

Testing Requirements

PM and PM₁₀ stack testing will be required on one (1) of the 2 shotblasters/baghouses to verify compliance with the limits to render 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) requirements not applicable.

Recommendation and Conclusion

- (1) Based on the facts, conditions and evaluations made, OAQ staff recommends to the IDEM Commissioner that the operation of the finishing plant be made available to the public and interested parties for review.
- (2) Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 2, 2003, with additional information received on March 4, 2004; October 7, 2005; and October 21, 2005.

- (3) The applicant has provided a copy of the application to the Gary Public Library, Bronswick Branch, 220 W. 5th Avenue, Gary, IN 46403.

- (4) The applicant has notified the following government officials:
 - (a) Mayor of Gary, and
 - (b) Lake County Commissioner
- (5) The operation of this finishing plant shall be subject to the conditions of the attached proposed FESOP No. **089-17924-00157**.

IDEM Contact

Questions regarding this proposed FESOP can be directed to Ms. Iryn Calilung at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, Indianapolis, Indiana 46204 or by telephone at (317) 233-5692 or toll free at 1-800-451-6027 extension 3-5692.

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

**Addendum to the Technical Support Document (TSD)
Federally Enforceable State Operating Permit (FESOP)**

Source Background and Description

Source Name:	Republic Engineered Products Inc.
Source Location:	2800 East Dunes Highway, Gary, IN 46402
Mailing Address:	401 Rose Avenue S.E., Massillon, OH 44646
Source General Telephone Number:	219/886-8110
Responsible Official:	Plant Manager
County:	Lake
SIC Code:	3316 (Cold-Rolled Steel Sheet, Strip, and Bars) 331221 (under the NAICS Code)
Source Categories:	Not 1 of the 28 listed source categories Minor PSD Source Minor EO Source Minor Source, CAA Section 112
Permit No.:	089-17924-00157
Permit Reviewer:	Iryn Calilung 317/233-5692

Public Notification and Participation

On December 1, 2005, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) had a notice published in The Post Tribune and The Northwest Indiana Times newspapers, stating that Republic Engineered Products, Inc. had applied for an air approval to operate their cold steel bar finishing plant. The public comment period ended on December 31, 2005. The purpose of the 30-day public comment period is to allow anyone the opportunity to review and provide comments regarding the draft permit and its supporting documents.

The IDEM does not amend the Technical Support Document (TSD) and Appendices of the draft permit. They are maintained to document the original review. This addendum to the TSD documents the comments, responses, and revisions made from the time the permit was drafted until a final decision is made.

Comments Received

Written comments from Republic Engineered Products, Inc. were received on January 3, 2006 and March 2, 2006. Summary of these comments, with corresponding IDEM's responses, including changes to the permit are written below.

Language recommended by Republic Engineered Products, Inc. is shown underlined, while language deleted and new language added by IDEM is shown in ~~strikeout~~ and **bold** fonts, respectively.

The identification used to identify the comments in this TSD Addendum does not necessarily coincide the with the identification used by Republic Engineered Products, Inc. in submitting the comments.

Comment No. 1: Not a Part 70 Major Source
Republic Engineered Products, Inc. does not believe that this plant needs a FESOP in order to avoid a Part 70 permit because the facility is not a Part 70 major source.

The primary sources of particulate emissions from this facility are the three (3) shotblasters. Pursuant to 326 IAC 6.8-1-2(a), the particulate emissions from the shotblasters must not exceed 0.03 grains/dscf. This grain loading limit is applicable to the shotblasters and is therefore an "operational limitation" that is required by Indiana's SIP and is "federally enforceable". This operational limitation should accordingly be considered in determining the emission unit's potential to emit for purposes of determining the applicability of the Part 70 program.

To the extent that an operational limitation must be also "practically enforceable" in order to be considered for the purposes of determining potential to emit, the grain loading limitation meets this requirement. Compliance with this grain loading can be verified through performance testing and can be discerned by an inspector.

When considering the required grain loading limit for the shotblasters, the potential to emit PM10 from these shotblasters is less than 17 tons per year. The remaining emission units at the plant have a cumulative potential to emit PM10 of less than 1 ton per year. Thus for the purpose of the Part 70 Program, the total potential to emit PM10 is below the 100 tons per year major source threshold. A FESOP is not required.

In sum, Republic Engineered Products, Inc. maintains that a FESOP is not required for this source. However, in light of IDEM's apparent position and without waiving its position that a FESOP is required, Republic Engineered Products, Inc. is providing comments on the draft FESOP.

IDEM Response No. 1:

IDEM determined that this source is subject to the Part 70 Program because of the following reasons:

First, the particulate potential to emit of the shotblasters before add-on control is greater than 100 tons per year, thus the source is subject to the Part 70 Program.

Second, the applicable grain loading requirement under 326 IAC 6.8-1-2(a) is not enforceable as a practical matter for the shotblasters until compliance monitoring requirements are specified in a federally enforceable permit, such as a Part 70 Permit or FESOP. Prior to the issuance of a Part 70 Permit or FESOP, such grain loading specifications cannot be classified as enforceable as a practical matter. Thus, the particulate potential to emit after control cannot be used to determine the permitting level of the source.

Lastly, this source does not specifically belong to any of the source categories listed in 326 IAC 2-7-2(b) as exempted from obtaining a Part 70 Permit.

- Comment No. 2: Correct Name, Mailing Address and Authorized Individual
- (a) The correct name of the entity operating this facility is Republic Engineered Products, Inc. The facility name should be revised accordingly throughout the permit where “Republic Engineered Products” or “REP” has been used. Also, references to the “Gary Dunes Plant” should be deleted because the current owner does not refer to this facility in this manner.
 - (b) The mailing address should be the same as the source address provided in Section A.1.
 - (c) To be consistent with the definition of authorized individual provided in 326 IAC 2-1.1-1(i), the Authorized Individual identified in Section A.1 should include the Plant Manager or his or her duly authorized representative. Republic Engineered Products, Inc. requests that this language be added, in order to avoid the unnecessary restrictions of an authorized individual to only the Plant Manager.

IDEM Response No. 2:

IDEM agrees with the proposed changes. Section A.1 has been revised as follows:

- A.1 General Information [326 IAC 2-8-3(b)]
The Permittee owns and operates a stationary steel bar cold finishing plant.
- | | |
|-------------------------|---|
| Authorized individual: | Plant Manager or his or her duly authorized representative |
| Source Address: | 2800 East Dunes Highway, Gary, IN 46402 |
| Mailing Address: | 401 Rose Avenue S.E., Massillon, OH 44646
2800 East Dunes Highway, Gary, IN 46402 |
| General Source Phone: | 219/886-8110 |
| SIC Code: | 3316 (Cold-Rolled Steel Sheet, Strip, and Bars)
331221 (under the NAICS Code) |
| Source Location Status: | Nonattainment for PM _{2.5} , SO ₂ , and ozone
Attainment for all other criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD and Emission Offset Rules
Minor Source, under Section 112 of the Clean Air Act
Not 1 of 28 Listed Source Categories |

- Comment No. 3: Description of the Annealing Furnaces
Republic Engineered Products, Inc. recommends that the following changes should be made in Section A.1 and Section D.1 of the draft FESOP:
- (a) The present description of the two (2) natural gas fueled annealing is accurate with respect to the fact that there are no roof monitors for these emission units. However, note the following corrections with respect to ventilation:
- AF7187 is exhausted to the atmosphere through a roof vent by an exhaust fan.
- AF9800 has eight (8) combustion zones, four (4) of which are vented to the atmosphere and four (4) of which are exhausted into the building.
- (b) The third annealing furnace (electric) has a maximum capacity of 1.6 MMBtu per hour (rather than 15 MMBtu per hour as stated in the draft FESOP).

IDEM Response No. 3:

IDEM agrees with the proposed changes. Sections A.1 and D.1 have been revised as follows:

Two (2) natural gas fueled annealing furnaces, identified as AF 7187 and AF 9800, with uncontrolled emissions exhausting inside the building.

There are no roof monitors/vents. There are side wall vents for general ventilation.

- (1) Annealing furnace AF7187 has a maximum capacity of 6.5 million (MM) Btu per hour.

AF7187 is exhausted to the atmosphere through a roof vent by an exhaust fan.

- (2) Annealing furnace AF9800 has a maximum capacity of 15 MMBtu per hour.

AF9800 has eight (8) combustion zones, four (4) of which are vented to the atmosphere and four (4) of which are exhausted into the building.

A third annealing furnace is fueled by electricity, and has a maximum capacity of ~~15~~ **1.6** MMBtu per hour. There are no regulated air emissions from this third annealing furnace (electric).

- Comment No. 4: Description of the Shotblasters And Baghouses
Republic Engineered Products, Inc. recommends that the following changes should be made in Sections A.1 and D.2 of the draft FESOP:
- (a) As provided in the construction permit application dated August 28, 2003, the Multiblaster #1 has an estimated maximum capacity to clean 14,760 pounds of steel per hour (not 14,769 pounds of steel per hour as stated in the draft FESOP).
 - (b) The particulate emissions from the Baghouse identified as Torit 4-32 exhaust into the building (rather than through a stack as stated in the draft FESOP).
 - (c) The particulate emissions from the Baghouse identified as Torit 4-8 exhaust through a stack horizontally from the east side of the building.
 - (d) Baghouse Torit 4-8 has a specification of 2,700 acfm (rather than 3,750 acfm as stated in the draft FESOP).

IDEM Response No. 4:

IDEM agrees with the proposed changes. Sections A.1 and D.2 have been revised as follows:

Three (3) enclosed shotblasters, identified as Multiblaster #1, Wheelbrator Skew Roll Shotblaster #2 and Pangborn Shotblaster #3. These enclosed shotblasters are used to mechanically clean the bars and remove the outer scales developed during annealing.

- (1) The Multiblaster #1 has a maximum capacity to clean ~~14,769~~ **14,760** pounds of steel per hour.
- (2) The Wheelbrator Skew Roll Shotblaster #2 has a maximum capacity to clean 9,520 pounds of steel per hour.

The particulate emissions from the Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2 are controlled by an ultra web baghouse (identified as Torit 4-32), with specifications of 11,750 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust ~~through a stack identified as Stack T4-32~~ **into the building.**

- (3) The Pangborn Shotblaster #3 has a maximum capacity to clean 9,520 pounds of steel per hour.

The particulate emissions from the Pangborn Shotblaster #3 are controlled by an ultra web baghouse (identified as Torit 2-8), with specifications of ~~3,750~~ **2,700** acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust through a stack identified as Stack T2-8, **horizontally from the east side of the building.**

Comment No. 5: Prior Permits Superseded - Condition A.5
Republic Engineered Products, Inc. requests confirmation from IDEM that, pursuant to this Condition, upon issuance, the FESOP superseded the Certificates of Operation issued by the City of Gary Department of Environmental Affairs for this source and the Certificated of Operations are no longer in effect or required, including the annual fees.

IDEM Response No. 5:
This FESOP is issued by IDEM under the authority provided by the state rules, while the Certificates of Operation issued by the City of Gary are authorized under city's local ordinance. The registrations and permits referenced by this condition are the approvals issued by IDEM only and approved into the state implementation plan. The Certificates of Operations issued by the City of Gary are not part of the state implementation plan. Such Certificates of Operations are separate and different from the air approvals issued by IDEM.

The annual operating fees are also separate and different requirements by the state and local agencies.

For additional information regarding the city's local ordinance, please refer to the following we site: <http://www.gary.in.us/environmentalaffairs/default.asp>

There are no changes to the draft permit due to this comment.

Comment No. 6: Enforceability - Condition B.4
Condition B.4 - Enforceability provides that "unless otherwise stated", the terms and conditions of the FESOP are federally enforceable. There are several problems with the blanket designation of federal enforceability contained in this general permit term.

First, Republic Engineered Products, Inc. questions whether several of the draft FESOP's terms and conditions are appropriate FESOP requirements in the first instance. Several of the terms and conditions in the draft FESOP are not related either to requirements designed to limit the source's capacity to emit below Part 70 threshold levels or to assure compliance with applicable requirements, as defined in 326 IAC 2-7-1(6). The following conditions in the draft FESOP are based on provisions of Indiana State laws but are not part of the Indiana SIP:

C.3 - Open Burning
C.4 - Incineration
C.7 - Asbestos Abatement Projects
C.13 - Emergency Reduction Plans

Second, to the extent that the FESOP does contain terms and conditions that are not directly related to applicable requirements, the terms and conditions are not federally enforceable and should be expressly designated in the FESOP as "state-only enforceable" or "not federally enforceable" to avoid blanket designation of federal enforceability.

IDEM Response No. 6:

Pursuant to 326 IAC 2-8-4 (Permit Content), the FESOP should not only include emission limitations and standards such that the source does not fall within the applicability of the Part 70 Program, but the FESOP should also include operational requirements that assure compliance on a continuous basis with all applicable requirements. IDEM has worked with US EPA Region V to determine what conditions have to be specified in a FESOP to ensure compliance with applicable requirements. IDEM determined that the all the conditions specified in this FESOP are necessary to fulfill the intent of the FESOP rule.

The proposed recommendation that the following conditions:

- C.3 - Open Burning
- C.4 - Incineration
- C.7 - Asbestos Abatement Projects
- C.13 - Emergency Reduction Plans

be identified, as "state-only enforceable" was not accommodated because 326 IAC 2-8 is approved under the Indiana state implementation plan, thus applicable requirements specified in a FESOP are state and federally enforceable.

There are no changes to the draft permit due to this comment.

Comment No. 7:

Preventive Maintenance Plan - Condition B.12

Republic Engineered Products, Inc. recommends that the following sentence should be deleted in its entirety from Condition B.12(b) because this permit condition is not required by 326 IAC 1-6-3 or 326 IAC 2-8-3(c)(6) or other applicable requirements.

- B.12(b) IDEM, OAQ and City of Gary Department of Environmental Affairs may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit.

IDEM Response No. 7:

IDEM can not delete the sentence because such requirement provides an advance notice to the Permittee that IDEM has the authority under 326 IAC 1-6-3(b) to require the Permittee to revise its PMP, as necessary when these limited scenarios occur.

There are no changes to the draft permit due to this comment.

- Comment No. 8: Emergency Provisions - Condition B.13
- (a) Republic Engineered Products, Inc. recommends that the following sentence should be deleted in its entirety from Condition B.13(e) because this permit condition is not required by the cited provision 326 IAC 2-8-12.
- B.13(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.
- (b) Republic Engineered Products, Inc. recommends that Condition B.13(h) should be deleted in its entirety. There is no requirement that the Permittee shall include emergencies in its reporting of deviation from FESOP requirements.
- 326 IAC 2-8-4(3)(C)(ii) and Conditions B.14(a) and B.14(b)(5) specifically provide that:
- (1) proper notice submitted under 326 IAC 2-8-12 for emergencies satisfies the reporting requirements for deviations from FESOP requirements; and
- (2) the reporting of deviations required by an applicable requirement shall follow the schedule stated in the applicable requirement.

IDEM Response No. 8:

IDEM recognizes that this specific portion of Condition B.13(e) does not reflect the actual language of the state rule, 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.

Pursuant to 326 IAC 2-8-12(b)(5), the Permittee is required to notify IDEM in writing or by facsimile of the emergencies, within two (2) working days of the time when emission limitations were exceeded due to the emergencies. This notification must be certified by the authorized individual. In most cases, it is not feasible for the Permittee to submit a certified report within the 2-working day deadline, thus, IDEM determined that reporting such emergencies in the Quarterly Deviation and Compliance Monitoring Report (which is certified by the authorized individual) will satisfy the certification requirement.

- Comment No. 9: Deviations from Permit Requirements and Conditions - Condition B.14
- (a) Republic Engineered Products, Inc. disagrees with the requirement to submit a Quarterly Deviation and Compliance Monitoring Report, or its equivalent, to the extent that it requires that a report be submitted even if there are no deviations in a given reporting period. Such reporting serves no purpose and is contrary to the FESOP deviation reporting requirements set forth in 326 IAC 2-8-4(3)(C), which require the reporting of deviations and not the absence thereof. Accordingly, these provisions should be revised to only require submittal of deviation reports for

quarterly reporting periods in which there is a deviation.

- (b) Republic Engineered Products, Inc. recommends that the first sentence of Condition B.14(a) should be revised as follows because this revision is necessary to clarify that, consistent with the suggested revision and reasons indicated in the comment on Condition B.13 - Emergency Provisions, proper notice of emergencies fulfills the deviation reporting requirements of 326 IAC 2-8-4(3)(C)(ii).:

Deviations from any permit requirements (except for emergencies, which shall be reported as set forth in Section B - Emergency Provision)...

- (c) For clarity, Condition B.14 -Deviations from Permit Requirements and Conditions should specify the quarterly periods and a reasonable time period for the submittal of the Quarterly Deviation and Compliance Monitoring Report, or its equivalent, if required.

Republic Engineered Products, Inc. suggests that the following language be added to the end of Condition B.14(a):

The quarterly reporting periods shall be calendar quarters. If required, a Quarterly Deviation and Compliance Monitoring Report, or its equivalent, shall be submitted on April 30, July 31, and January 31.

IDEM Response No. 9:

- (a) IDEM agrees that the Permittee is not required to submit a report if no deviations occurred for the given reporting period. The FESOP Quarterly Deviation and Compliance Monitoring Report was revised by deleting the following portion of the report:

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

- (b) IDEM agrees with the proposed changes because they provide clarity and certainty. However, Condition B.14(a) was not revised as exactly recommended. Condition B.14(a) was revised to be consistent with the General Reporting Requirements.

B.14(a) Deviations from any permit requirements (**except for emergencies, which shall be reported as set forth in**

see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

and

City of Gary Department of Environmental Affairs
839 Broadway Street, 2nd Floor NE
Gary, IN 46402

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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Quarterly Deviation and Compliance Monitoring Report shall be submitted within thirty (30) days of the end of the reporting period.

The first report shall cover the period commencing on the date of issuance of the original FESOP and shall end on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Comment No. 10:

Operational Flexibility - Condition B.18

(a) Republic Engineered Products, Inc. recommends that Condition B.18(a)(5) should be revised as follows because the language in the draft permit incorporates the wrong IAC citation and is incomplete. The revised language accurately tracks the language of 326 IAC 2-8-15(b).

B.18(a)(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 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review. Such records shall consist of all of the information required to be submitted in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Republic Engineered Products, Inc. suggests that the following sentence should be added as the second sentence of Condition B.18(c) because this operational flexibility is provided by 326 IAC 2-8-15(d) and should be expressly provided in the FESOP.
- B.18(c) The Permittee may request that the FESOP be revised to include an alternative operating scenario in accordance with the provisions of 326 IAC 2-8-11.1(f).

IDEM Response No. 10:

IDEM agrees with the proposed changes because they coincide with the actual language of the rule. Condition B.18 - Operational Flexibility has been revised as follows:

- B.18(a)(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)~~ **326 IAC 2-8-15(b) through (d)**. The Permittee shall make such records available, upon reasonable request, for public review. **Such records shall consist of all of the information required to be submitted in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).**
- B.18(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- Pursuant to 326 IAC 2-8-15(d), the Permittee may request that the FESOP be revised to include an alternative operating scenario in accordance with the provisions of 326 IAC 2-8-11.1(f).**

Comment No. 11:

Annual Fee Payment - Condition B.22

Republic Engineered Products, Inc. suggests that the following sentence be added at the end of Condition B.22(a), because this provision is expressly provided by 326 IAC 2-8-16(b) and should be incorporated into this annual fee condition of the FESOP.

- B.22(a) The Permittee shall not be assessed an annual operating fee in the billing cycle immediately following issuance of the FESOP, but shall be assessed the annual fee in subsequent billing cycles.

IDEM Response No. 11:

Since the proposed language reflects the actual language of the rule, IDEM agrees with the proposed change. Condition B.22(a) has been revised as follows:

- B.22(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.

Pursuant to 326 IAC 2-8-16(b), for sources that submit an application for a FESOP after December 31, 1995, the Permittee shall not be assessed an annual operating fee in the billing cycle immediately following issuance of this FESOP, but shall be assessed the annual fee in subsequent billing cycles.

Comment No. 12:

Credible Evidence - Condition B.23

Republic Engineered Products, Inc. recommends that the following Credible Evidence statement be added as a new condition, because in accordance with the Credible Evidence rule (62 Fed. Reg. 8314, February 24, 1997), the use of credible, non-reference test data may be used by the Permittee to prove compliance with an applicable emission standard. The FESOP should reflect the operation flexibility encompassed by the Credible Evidence Rule.

B.23 Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

IDEM Response No. 12:

IDEM agrees that a condition based on the Credible Evidence Rule has to be added to the FESOP. IDEM did not incorporate the language as proposed by Republic Engineered Products, Inc., instead IDEM added a condition that reflects the language of the current state rule. Condition B.23 - Credible Evidence has been added as follows and the Table of Contents has been revised accordingly:

**B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]
For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.**

Comment No. 13:

Performance Testing - Condition C.7

Republic Engineered Products, Inc. recommends that the following language should be added at the beginning of the first and second sentences of Condition C.7(a) because the additional language tracks the language of 326 IAC 3-6 and the applicability of the performance testing procedures notification requirements specified therein.

C.7(a) When required in order to determine compliance with an applicable emission limitation or as required by this FESOP, 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.

When an emission test is to be performed by the Permittee, a test protocol, except as provided elsewhere in this permit, shall be submitted to:...

IDEM Response No. 13:

IDEM agrees with the proposed changes because they coincide with the language of the rule 326 IAC 3-6. Condition C.7(a) has been revised as follows:

C.7(a) When required in order to determine compliance with an applicable emission limitation or as required by this FESOP, 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.

When required in order to determine compliance with an applicable emission limitation or as required by this FESOP, a test protocol, except as provided elsewhere in this permit, shall be submitted to...

Comment No. 14:

Emergency Reduction Plan (ERP) - Condition C.12
The ERP requirements are not applicable to the facility if the FESOP is issued. Under 326 IAC 1-5-2, only sources that have a potential to emit 100 tons per year or more of any pollutant are required to prepare, submit and implement ERPs. The FESOP expressly limits the facility's potential to emit to less than 100 tons per year, and therefore an ERP is not required for the facility and Condition C.12 is unnecessary.

IDEM Response No. 14:

IDEM agrees and deleted Condition C.12 - Emergency Reduction Plan (ERP), Subsequent conditions have been renumbered.

~~C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):
(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
(b) These ERPs shall be submitted for approval to:
Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
and
City of Gary Department of Environmental Affairs~~

839 Broadway Street, 2nd Floor NE
Gary, IN 46402

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

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

- ~~(c) If the ERP is disapproved by IDEM, OAQ and City of Gary Department of Environmental Affairs, 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 and City of Gary Department of Environmental Affairs, 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]~~

Comment No. 15:

Response to Excursions or Exceedances - Condition C.13

Republic Engineered Products, Inc. believes that Condition C.13 - Response to Excursions or Exceedances does not impose appropriate FESOP requirements as set forth in 326 IAC 2-8-4 (Permit Content), as this condition imposes new requirements that go well beyond what is necessary to assure continuous compliance with underlying applicable requirements or to address emission limitations associated with startups, shutdowns, and malfunctions.

Additionally, as currently drafted, the requirements of Condition C.13 - Response to Excursions or Exceedances are exceptionally vague and overly broad in scope. To the extent that this Condition C.14 is retained, Republic Engineered Products, Inc. requests that IDEM significantly revise Condition C.13 - Response to Excursions or Exceedances to incorporate several necessary clarifications.

- (a) Condition C.13 - Response to Excursions or Exceedances should make clear that this condition applies to excursions or exceedances from applicable emission limits and standards. As currently written, this condition applies to excursions and exceedances without any clarification regarding the applicability of this provision.
- (b) Condition C.13 - Response to Excursions or Exceedances should expressly state that this condition does not apply to emergencies, which instead are addressed in Condition B.13 - Emergency Provisions.

Condition B.13 - Emergency Provisions provides specific requirements for implementing reasonable steps to minimize levels of excessive emissions during emergencies, as well as recordkeeping and reporting requirements for emergencies. This revision is necessary in order to avoid duplicative and/or inconsistent obligations with respect to the Permittee's handling of emission exceedances caused by emergency events.

- (c) Condition C.13(a) should clarify that the obligation to restore the

operation of the emission unit should be for minimizing excess emissions, rather than emissions in general.

C.13(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 excess emissions.

- (d) The vague terms of:
- response actions,
 - reasonable response steps,
 - corrective actions, and
 - acceptable procedures
- are used interchangeably throughout Condition C.14. Republic Engineered Products, Inc. requests that these terms be uniformly revised throughout Condition C.13 to provide the use of "reasonable response actions".

Accordingly, Condition C.13(b) should be revised as follows:

C.13(b) The response shall include minimizing the period of any startup, shutdown or malfunction, to the extent feasible, taking into consideration available technologies, safety cost, and other relevant factors. The response shall also include taking reasonable response actions to prevent the likely recurrence of the cause of an excursion or exceedance of the applicable emission standard or limitation (other than those caused by excused startup or shutdown conditions). Reasonable response actions may include, but are not limited to, the following:

- (e) Republic Engineered Products, Inc. believes that Condition C.13(c) should recognize that the information available in determining whether the Permittee has used reasonable response actions in response to an excursion or exceedance of an applicable emission standard or limits includes other relevant factors, such as available technologies, safety, and cost. Consideration of these factors (at least with respect to startups and shutdowns) is expressly recognized by 326 IAC 2-8-4(i)(D).
- (f) Republic Engineered Products, Inc. believes that Condition C.13(e) mandating recordkeeping requirements for excursions and exceedances, is excessively vague and overly burdensome. Republic Engineered Products, Inc. suggests that IDEM revise this provision as follows:

C.13(e) The Permittee shall maintain the following records of instances in which an excursion of an applicable emission standard or limit was detected and the reasonable response action taken, if any :

IDEM Response No. 15:

Condition C.13 - Response to Excursions or Exceedances was not deleted because it is necessary to fulfill the main goal of the program that each Permittee must be able to verify compliance with applicable standards and requirements. Condition C.13 - Response to Excursions or Exceedances provides certainty to the Permittee and IDEM staff that corrective actions are taken when excursions or exceedance occur.

The recommended changes were not accommodated because Condition C.13 - Response to Excursions or Exceedances does not apply to only excursions or exceedances from applicable emission limits and standards, but this condition also applies to excursions and exceedances from general conditions, compliance determination, and compliance monitoring.

The Permittee will be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. The 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.

There have been no changes to Condition C.13 - Response to Excursions or Exceedances, as a result of this comment.

Comment No. 16:

General Reporting Requirements - Condition C.16
Condition C.16(a) is substantively identical to the quarterly deviation reporting requirements in Condition B.14 - Deviations from Permit Requirements and Conditions. Republic Engineered Products, Inc. requests that this duplicative requirement be deleted from Condition C.16 - General Reporting Requirements.

If this provision is nevertheless retained, please refer to the comments made for Condition B.14 - Deviations from Permit Requirements and Conditions, for the appropriate revisions concerning deviation reporting requirements.

IDEM Response No. 16:

IDEM recognizes that there are several provisions that are similar. However, these similarities are necessary to provide clarity. These similarities also minimize the referencing of conditions and sections within the permit, thus making the permit easy to follow.

Comment No. 17:

Natural Gas Usage - Condition D.1.1
Republic Engineered Products, Inc. recommends that the phrase "two (2) annealing furnaces" should be changed to : Annealing Furnaces AF7187 and AF9800, because this clarifies which of the annealing furnaces at the source are subject to Condition D.1.1, as the source operates a third, electric annealing furnace that is not subject to the natural gas usage.

IDEM Response No. 17:

IDEM agrees with the proposed change. Condition D.1.1 has been revised as follows:

- D.1.1 Natural Gas Usage [326 IAC 6.8-6-1] [326 IAC 2-8]
Pursuant to 326 IAC 6.8-6-1 (Lake County: Combustion Sources: Natural Gas) and 326 IAC 2-8 (FESOP), ~~the two (2) annealing furnaces~~
Annealing Furnaces AF7187 and AF9800 shall fire natural gas only.

Comment No. 18: Particulate Matter (PM) Limit - Condition D.2.1
Republic Engineered Products, Inc. points out that the parenthetical language in Conditions D.2.1 (a) and D.2.1(b) should be revised as follows: (Particulate Matter Limitations For Lake County), because current parenthetical language is incorrect.

IDEM Response No. 18: IDEM agrees with the correction. Condition D.2.1 has been revised as follows:

- D.2.1 Particulate Matter (PM) Limit [326 IAC 6.8-1-2]
(a) Pursuant to 326 IAC 6.8-1-2(a)(Particulate Matter Limitations, ~~Except For~~ **For** Lake County), the particulate matter (PM) emissions from the Torit 4-32 baghouse shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

(b) Pursuant to 326 IAC 6.8-1-2(a)(Particulate Matter Limitations, ~~Except For~~ **For** Lake County), the particulate matter (PM) emissions from Torit 2-8 baghouse shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

Comment No. 19: PM and PM₁₀ PSD Minor Limits - Conditions D.2.2 and D.2.3
(a) Republic Engineered Products, Inc. recommends that Conditions D.2.2 and D.2.3 should be deleted in their entirety. The imposition of lb/hour emission limitations for PM and PM₁₀ in order to establish PSD Minor Limits is duplicative of the emission limitations identified in Section D.2.1. These lb/hour limitations are merely calculations that extrapolate from an enforceable emission rate (0.03 grains/dscf) and serve no useful regulatory purpose, as they are not derived from any separate federally enforceable basis. They are merely an additional paperwork burden and are not appropriate in a FESOP.

(b) For the reasons and comments made for Conditions D.2.2 - PM PSD Minor Limit and D.2.3 - PM₁₀ Limit, Republic Engineered Products, Inc. recommends that the following sentence be added to Condition D.2.1:

Compliance with these limits make 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70 Program) inapplicable.

IDEM Response No. 19: The particulate matter emission limitations in Condition D.2.1 were specified under 326 IAC 6.8-1-2. They are independent and separate requirements from the particulate matter emissions in Conditions D.2.2 and D.2.3 to satisfy the non-applicability of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Program). Compliance with one particulate matter emission limitation does not necessarily

ensure compliance with the other requirement.

There are no changes in the draft permit due to this comment.

Comment No. 20: Preventive Maintenance Plan (PMP) - Condition D.2.4
Republic Engineered Products, Inc. recommends that the term "shotblasters" should be deleted from Condition D.2.4 because the scope and contents of the PMP dictated by 326 IAC 1-6-3, relate to the inspection, maintenance, and repair of emission control devices. The rule does not require PMP provisions for emissions units, such as the source's shotblasters.

IDEM Response No. 20: The PMP requirement as described in 326 IAC 1-6-3 sets out the requirements for:

- (a) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (b) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (c) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(3)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

However, upon further evaluation, the PMP requirement for the shotblasters themselves has been deleted as follows:

D.2.4 Preventive Maintenance Plan (PMP) [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan (PMP), of this permit, is required for the ~~shotblasters and baghouses~~.

Comment No. 21: Particulate Control Operation - Condition D.2.5
Condition D.2.5 - Particulate Control Operation is substantively identical to Condition C.6 - Operation of Equipment. Republic Engineered Products, Inc. requests that this duplicative requirement be deleted in its entirety.

If Condition D.2.5 - Particulate Control Operation is nevertheless retained, the following phrase should be added at the beginning of the sentence in order to provide clarity.

D.2.5 Except as otherwise provided by statute, rule or in this FESOP, the

baghouses (identified as Torit 4-32 and Torit 2-8) shall be in operation and control the particulate emissions from the shotblasters at all times when any of the shotblasters are in operation.

IDEM Response No. 21:

Condition D.2.5 - Particulate Control Operation was not deleted because it provides clarity and certainty. However, IDEM agrees with the proposed change as recommended by Republic Engineered Products, Inc. if the condition is retained. Condition D.2.5 - Particulate Control Operation has been revised as follows:

D.2.5 Except as otherwise provided by statute, rule or in this FESOP, the baghouses (identified as Torit 4-32 and Torit 2-8) shall be in operation and control the particulate emissions from the shotblasters at all times when any of the shotblasters are in operation.

Comment No. 22:

Testing Requirements - Condition D.2.6

The reference to Torit 4-32 should be omitted from Condition D.2.6 - Testing Requirements because Torit 4-32 exhausts into the building and not through a stack.

IDEM Response No. 22:

Even though this baghouse exhausts inside the building, testing is required to verify compliance with the applicable PM and PM₁₀ limits. The baghouse exhaust is ultimately emitted through general building ventilation.

Condition D.2.6 - Testing Requirements provides the Permittee an option to test one of these two (2) baghouses since they control similar emission units.

There are no changes to the draft permit due to this comment.

Comment No. 23:

Visible Emissions Notations - Condition D.2.7 and
Record Keeping Requirements - Condition D.2.10

- (a) The requirement to perform once per day visible emission notations is overly burdensome and unnecessary to evaluate continuous compliance with the applicable requirements of 326 IAC 5 and 326 IAC 6.8. Such new and additional obligations are not permitted by the FESOP rules, and merely serve to add unnecessary, burdensome paperwork requirements.

Republic Engineered Products, Inc. requests that the monitoring of visible emission notations be deleted, or, at most, be required on a weekly basis. Once per week monitoring of visible emissions is more adequate to meet the agency's purpose in imposing this obligation.

- (b) If the visible emission notations requirements are removed from the FESOP, the recordkeeping requirements of Condition D.2.10 should likewise be removed.
- (c) To the extent that the visible emission notations requirements are retained, the recordkeeping requirements should be limited to Stack T2-8

and should require records for once per week notations.

- (d) The reference to Stack T4-32 should be omitted from Condition D.2.7(a) because Torit 4-32 exhausts into the building and not through a stack.

IDEM Response No. 23:

IDEM did not delete the Visible Emission Notations requirement as recommended by Republic Engineered Products, Inc. because this compliance monitoring requirement is necessary to ensure compliance on a continuous basis with the applicable emission limitation and standard. IDEM did not change the daily frequency of the visible emission notations because the Permittee, at this time, does not have any historical compliance data that can support that less frequent monitoring is sufficient to verify compliance on a continuous basis.

IDEM agrees with the proposed change to delete Stack T4-32. Condition D.2.7(a) has been revised as follows:

D.2.7(a) Visible emission notations of the baghouses stack (identified as ~~Stack T4-32 and~~ Stack T2-8) exhausts 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.

Comment No. 24:

Baghouse Parametric Monitoring - Condition D.2.8 and
Record Keeping Requirements - Condition D.2.10

- (a) Republic Engineered Products, Inc. objects to all parametric monitoring to the extent that it adds obligations that are not specified in an underlying applicable requirement or permit condition. Such new and additional obligations are not permitted by the FESOP rules, and merely serve to add unnecessary, burdensome paperwork requirements.

To the extent that a differential pressure parametric range is retained for Torit 4-31 and Torit 2-8, several revisions to Condition D.2.8 - Baghouse Parametric Monitoring should be made.

- (1) The normal differential pressure operating change for both baghouses should be identified as 2.0 and 8.0 inches of water.
- (2) Condition D.2.8 - Baghouse Parametric Monitoring should state that readings outside of the established range after bag or filter changes, or during other temporary events that normally occur, should not trigger further evaluation or responsive actions in accordance with Condition C.15 -Response to Excursions or Exceedances, provided that the readings return to the established range after the temporary event ceases.

Republic Engineered Products, Inc. proposes the following specific language, which is based on the language contained in Republic's Title V permit for its Ohio plants.

The pressure drop shall not be considered outside the normal range when the pressure falls below the minimum point in the pressure differential range as a result of bag or filter replacement.

- (3) While the parametric range should be extended to include differential pressures recorded during a stack test demonstrating compliance, a wholly new range should not be established based on a snap shot of operations during testing. Therefore, Republic Engineered Products, Inc. requests that IDEM revise the fourth line of this paragraph as follows:

“... or a range extended to include values established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.

Additionally, Condition D.2.8 - Baghouse Parametric Monitoring should provide that the normal parametric range for the baghouses may be reestablished by the Permittee and approved by IDEM.

- (b) If the baghouse parametric monitoring requirements are removed from the FESOP, the recordkeeping requirements of Condition D.2.10 - Record Keeping Requirements should likewise be removed.
- (c) To the extent that the baghouse parametric monitoring requirements are retained, the recordkeeping requirements should clarify that the once per day readings of the pressure drop across the baghouses are required only for the days that Republic Engineered Products, Inc. is operating the shotblasters when venting to the atmosphere.

IDEM Response No. 24:

IDEM did not remove the baghouse parametric monitoring requirements in Condition D.2.8 - Baghouse Parametric Monitoring because compliance monitoring conditions such as these are necessary to demonstrate continuous compliance with the permit requirements, pursuant to 326 IAC 2-8-4(3).

IDEM did not add the recommended language that pressure drop outside the normal range as a result of bag or filter replacement is acceptable because IDEM has concerns in providing such general blanket of approval without knowing the specific factors contributing to the change in pressure drop. However, the Permittee may include this explanation in the PMP or response action plan for the baghouses.

IDEM did not add the recommended language that the pressure drop range shall extend to include values established during stack test, because the condition clearly identifies that Permittee must identify the proper operating range during stack test.

Condition D.2.8 - Baghouse Parametric Monitoring, as currently written already clearly specifies that the pressure drop monitoring requirements are applicable

only when the shotblasters are in operation and the baghouses are exhausting into the atmosphere.

IDEM agrees with the proposed change to revise the pressure drop range of the baghouses. Condition D.2.8 - Baghouse Parametric Monitoring has been revised as follows:

D.2.8 The Permittee shall record the pressure drop across the:

- (a) baghouse (identified as Torit 4-32) used in conjunction with the Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2; and
- (b) baghouse (identified as Torit 2-8) used in conjunction with the Pangborn Shotblaster #3,

at least once per day when these shotblasters are in operation when venting to the atmosphere.

When for any one reading, the pressure drop across the baghouses is outside the normal range of:

- (a) ~~3.0 and 7.0~~ **2.0 and 8.0** inches of water for baghouse Torit 4-32,
- (b) ~~4.0~~ **2.0** and 8.0 inches of water for baghouse Torit 2-8,

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.

Comment No. 25:

Broken or Failed Bag Detection - Condition D.2.9

Republic Engineered Products, Inc. questions the applicability of this requirement, as the phrase "process operated continuously" is vague and ambiguous.

Moreover, sources should be allowed to continue to operate during control device failures as long as the emissions during control device failure are in compliance with applicable emission limitations and standards.

Republic Engineered Products, Inc. requests that the following language be added to Condition D.2.9:

D.2.9 For a single compartment baghouse controlling emissions from a process operated continuously, if failure is indicated by a significant drop in the baghouse's pressure readings or if a bag failure is detected by some other means, and if the failure is causing abnormal visible emissions that include a violation of opacity limits or other applicable emission limitations is continuing to occur, then 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).

IDEM Response No. 25:

IDEM did not make the changes as recommended by Republic Engineered Products, Inc. because the proposed language contradicts the intent of the condition. Significant drop in the baghouse's pressure drop is not the only indication there is failure in the baghouse.

Comment No. 26: Insignificant Activities - Section D.3

- (a) The insignificant activity of the one (1) above ground fixed dome, 275-gallon diesel tank is more accurately described as having a diesel fuel usage of less than 1,000 gallons per year (rather than an annual throughput of 750 gallons of diesel per year).
- (b) The source's roads and parking lots should be identified as an insignificant activity, for which no emission standards and limitations, compliance determination requirements, compliance monitoring requirements and recordkeeping and reporting requirements are applicable. The source is not subject to the requirements of 326 IAC 6.8-10.1 (Lake County PM Emission Limitations) for roadways and parking lots, because the source's potential to emit fugitive particulate matter is less than 5 tons per year.

IDEM Response No. 26:

- (a) IDEM agrees with the proposed change. The description of the insignificant activity has been revised as follows:

One (1) above ground fixed dome roof, 275-gallon tank that stores diesel fuel, **having a diesel fuel usage of less than 1,000 gallons per year**. ~~This tank has an annual throughput of 750 gallons of diesel per year.~~

- (b) IDEM generally does not specify insignificant activities in the permit if there are no specific requirements applicable to the insignificant activity. However, as requested by Republic Engineered Products, Inc. insignificant activities even without specific requirements applicable to them will be added in Section D.3 of the permit, as follows:

(3) Source's roads and parking lot.

Comment No. 27: Technical Support Document (TSD)

- (a) Republic Engineered Products, Inc. requests that IDEM amend the TSD or issue an addendum to address the suggested revisions regarding the emission units, control devices, and applicable requirements.
- (b) Republic Engineered Products, Inc. requests that IDEM clarify that the source's emission units include ten (10) mechanically pressurized straighteners, not strengtheners.
- (c) A provision should be added to clarify that prior to this FESOP, the City of Gary Department of Environmental Affairs has issued Certificates of Operation on an annual basis for the source.

- (d) This section "Enforcement Issues" is entirely inappropriate and should be deleted. If IDEM in fact has an enforcement issue, such an issue should be raised separately and directly with Republic Engineered Products, Inc.

IDEM Response No. 27:

- (a) As previously mentioned, IDEM does not amend the Technical Support Document (TSD) and Appendices of the draft permit. They are maintained to document the original review. This addendum to the TSD acknowledges changes and clarifications made to the draft permit.
- (b) IDEM agrees with the proposed correction. The listing of the emission units in the TSD should have read as follows:

The steel bar cold finishing plant consists of the following equipment:

- (a) ten (10) mechanically pressurized ~~strengtheners~~ **straighteners**,
 - (b) three (3) turning machines,
 - (c) three (3) shotblasters,
 - (d) three (3) drawbench machines,
 - (e) three (3) grinders,
 - (f) five (5) saws,
 - (g) two (2) polishers,
 - (h) two (2) testers,
 - (i) two (2) natural gas fueled annealing furnaces,
 - (j) one (1) electric annealing furnaces, and
 - (k) fourteen (14) natural gas fueled space heaters.
- (c) IDEM acknowledges that the City of Gary Department of Environmental Affairs has issued Certification of Operations to Republic Engineered Products, Inc. However, as previously mentioned, these certificates are independent and separate permitting requirements from the permitting requirements under the state rules.
 - (d) The TSD documents the permitting and compliance status of the source. It is also intended to provide information to the public, not just to the Permittee. IDEM will continue to work with Republic Engineered Products, Inc. regarding this issue.

IDEM Initiated Changes

- (a) The address of the City of Gary Department of Environmental Affairs has been updated from
504 Broadway Street, Suite 1012, Gary, Indiana 46402
to
839 Broadway Street, 2nd Floor NE, Gary, IN 46402.

(b) Section A.4 has been corrected as follows:

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

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

(c) Condition B.13 - Emergency Provisions has been revised by updating the telephone and facsimile numbers of the IDEM Northwest Regional Office:

B.13(b)(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and City of Gary Department of Environmental Affairs, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027
(ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

and

IDEM Northwest Regional Office
Telephone No.: ~~219-882-3007~~ **219-757-0265**
Facsimile No.: ~~219-882-3012~~ **219-757-0267**

(d) Condition B.22 - Annual Fee Payment has been revised by updating the Billing, Licensing, and Training Section:

B.22(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, ~~IM & Billing Section~~ **Billing, Licensing and Training Section**), to determine the appropriate permit fee.

(e) Condition C.6 - Operation of Equipment has been deleted. Subsequent conditions have been re-numbered.

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

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

(f) Condition C.10- Monitoring Methods has been corrected as follows:

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

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

(g) Condition C.13 - Risk Management Plan (RMP) has been corrected as follows:

C.13 Risk Management Plan (RMP) [326 IAC 2-8-4] [40 CFR 68]

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

IDEM Contact

Questions regarding this FESOP can be directed to Ms. Iryn Calilung at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, Indianapolis, Indiana 46204 or by telephone at (317) 233-5692 or toll free at 1-800-451-6027 extension 3-5692.