



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: June 19, 2007

RE: Outokumpu Stainless, Inc. / 065-17992-00003

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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



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100 North Senate Avenue
Indianapolis, Indiana 46204-2251
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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Outokumpu Stainless, Inc., Plate Products
549 West State Road 38
New Castle Road, In 47632**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T065-17992-00003	
Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 19, 2007 Expiration Date: June 19, 2012

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns an operation of manufacturing rolled steel plates.

Source Address:	549 West State Road 38 New Castle Indiana 47632
Mailing Address:	549 West State Road 38 New Castle Indiana 47632
General Source Phone Number:	765-529-0120
SIC Code:	3312
County Location:	Henry
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) 120" line pickling, installed in 1996, with a maximum capacity of 30 tons per hour, equipped with an optional wet scrubber as control device, and exhausting to stack E.
- (b) One (1) Batch pickling line, installed in 1944 and with a maximum capacity of 15 tons per hour, exhausting inside the building.
- (c) One (1) 120" line shot blaster, installed in 1996, with a maximum capacity of 30 tons per hour, equipped with a baghouse as control device, and exhausting to stack C.
- (d) One (1) Wheelabrator shot blaster, installed in 1980 and with a maximum capacity of 36.0 tons per hour, using a baghouse as control device, and exhausting to stack B.
- (e) One (1) finish mill walking beam reheat furnace, installed in 1995 and rated at 21 million British thermal units per hour, exhausting inside the building.
- (f) One (1) 120" line annealing furnace, installed in 1996 and rated at 39.60 million British thermal units per hour, exhausting inside the building.
- (g) One (1) finish mill hot rolling, installed in 1977 and with a maximum capacity of 2.625 tons per hour, exhausting inside the building.
- (h) One (1) slab mill walking beam reheat furnace-1, installed in 1962 and rated at 43.30 million British thermal units per hour, exhausting to stack S-1.
- (i) One (1) slab mill reheat furnace-2, installed in 1962 and rated at 51.58 British thermal units per hour, exhausting inside the building.

- (j) One (1) slab mill hot rolling, installed in 1947 and with a maximum capacity of 4.566 tons per hour, exhausting inside the building.
- (k) One (1) Salem annealing furnace-1, installed in 1991 and rated at 32 million British thermal units per hour, exhausting inside the building.
- (l) One (1) Salem annealing furnace-2, installed in 1991 and rated at 32 million British thermal units per hour, exhausting inside the building.
- (m) One (1) Heppenstall annealing furnace, installed in 1980 and rated at 10.80 million British thermal units per hour, exhausting inside the building.
- (n) One (1) natural gas fired 120" line boiler, installed in 1996 and rated at 10.04 million British thermal units per hour and exhausting to stack S-5.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour.
 - (1) One (1) natural gas fired boiler for batch pickling line with maximum heat input rating of 5.33 mmBtu/hr, installed in 1982. [326 IAC 6-2-4]
- (b) Degreasing operations, installed in 2001, that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 and 40 CFR 63, Subpart T. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
- (d) Walk Behind Grinder [326 IAC 6-3-2].
- (e) Belt Grinders [326 IAC 6-3-2].
- (f) Plasma Torch Cutter [326 IAC 6-3-2].
- (g) Shears [326 IAC 6-3-2].
- (h) One lime storage silo [326 IAC 6-3-2].

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T065-17992-00003, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61 -53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

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

Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (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
MC 61 -53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]
- B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]**
-
- (a) All terms and conditions of permits established prior to T157-18078-00046 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.
- B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**
-
- The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**
-
- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61 -53 IGCN 1003
Indianapolis, Indiana 46204-2251
- using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.
- The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**
-
- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61 -53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) 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
MC 61 -53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61 -53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2]

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

- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61 -53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

from IDEM, OAQ, the applicable fee is due April 1 of each year.

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.7 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
MC 61 -52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61 -53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(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
MC 61 -53 IGCN 1003

Indianapolis, Indiana 46204-2251

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

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

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

C.11 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.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 that the IDEM, OAQ approve the use of another instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 9, 1996.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not

limited to, the following:

- (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61 -53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

C.18 General Record Keeping Requirements[326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

(c) If there is a "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit or at a source with Plant-wide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or IAC 2-3-1 (mm)), the Permittee shall comply with following:

- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and

maintain the following records:

- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61 -53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
MC 61 -53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]	
(a)	One (1) 120" line pickling, installed in 1996, with a maximum capacity of 30 tons per hour, equipped with an optional wet scrubber as control device, and exhausting to stack E.
(b)	One (1) Batch pickling line, installed in 1944 and with a maximum capacity of 15 tons per hour, exhausting inside the building.
(The information describing the process in this facility description is descriptive information and does not constitute enforceable condition.)	

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

D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable PM emissions from the following facilities shall not exceed the limits as stated when operating at the respective process weight rates:

Emission Unit	Process Weight Rate (tons/hr)	Allowable Particulate Emission Rate (326 IAC 6-3-2) (lb/hr)
120" line pickling	30	40.0
Batch Pickling	15.0	25.20

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

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

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

D.1.2 PSD Minor Limit [326 IAC 2-2]

- (a) The input of metal processed in 120" line pickling shall be limited to less than 151,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The NOx emission rate from the 120" line pickling shall not exceed 3.0 pounds per ton of material processed.
- (c) The PM emissions from the 120" line pickling shall not exceed 2.00 pounds per ton of material processed.
- (d) The PM10 emissions from the 120" line pickling shall not exceed 2.00 pounds per ton of material processed.

Compliance with the above emission limits in combination with Condition D.2.4 and potential emissions of PM, PM10, and NOx from 120" line boiler and 120" line annealing furnace shall keep the PM, PM10, and NOx emissions from the 1996 source modification to less than 250 tons per year, each, and shall render 326 IAC 2-2 (PSD) not applicable to the 1996 source modification.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to determine compliance with Condition D.1.2 (a) through (d), the Permittee shall perform PM, PM-10, and NOx emissions stack test for 120" line pickling without control before September 22, 2009, utilizing the methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. PM10 includes filterable and condensable PM10. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the 120" line pickling stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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.

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain a daily record of visible emission notations of 120" line pickling stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (b) To document compliance with condition D.1.2 (c), the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with metal usage limits established in D.1.2 (c).
 - (1) Calendar dates covered in the compliance determination period; and
 - (2) Actual metal throughput since last compliance determination period.

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

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 (a) shall be submitted to the address listed in Section C- General Reporting Requirements, of this permit, using the reporting forms located at the end of the permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]	
(c)	One (1) 120" line shot blaster, installed in 1996, with a maximum capacity of 30 tons per hour, equipped with a baghouse as control device, and exhausting to stack C.
(d)	One (1) Wheelabrator shot blaster, installed in 1994 and with a maximum capacity of 36 tons per hour, using a baghouse as control device, and exhausting to stack B.
(The information describing the process in this facility description is descriptive information and does not constitute enforceable condition.)	

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emissions from the following facilities shall not exceed the limits as stated when operating at the respective process weight rates:

Emission Unit	Process Weight Rate (tons/hr)	Allowable Particulate Emission Rate (326 IAC 6-3-2) (lb/hr)
120" line shot blaster	30.0	40.0
Wheelabrator shot blaster	36.0	45.2

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

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

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

and

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

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

D.2.2 PSD Minor Limit [326 IAC 2-2]

- (a) The PM emissions from the Wheelabrator shotblaster shall not exceed 41.42 pounds per hour.
- (b) The PM10 emissions from the Wheelabrator shotblaster shall not exceed 41.42 pounds per hour.

Compliance with above limits shall render 326 IAC 2-2 (PSD) not applicable to the Wheelabrator shotblaster installed in 1994.

D.2.3 PSD Minor Limit [326 IAC 2-2]

- (a) The PM emissions from the 120" line shotblaster shall not exceed 21.88 pounds per hour.
- (b) The PM10 emissions from the 120" line shotblaster shall not exceed 21.88 pounds per hour.

Compliance with above limits in combination with Condition D.1.2, shall keep PM and PM10 emissions from the 1996 source modification to less than 250 tons per year, each, and shall render 326 IAC 2-2 (PSD) not applicable to the 1996 source modification.

Compliance Determination Requirements

D.2.4 Particulate Control

- (a) In order to comply with Conditions D.2.1, D.2.2 and D.2.3 the baghouses for particulate control shall be in operation and control emissions from the 120" line shot blaster and Wheelabrator shot blaster at all times that the 120" line shot blaster and Wheelabrator shot blaster are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) In order to determine compliance with Conditions D.2.3, the Permittee shall perform PM and PM10 emissions stack testing for 120" line shotblaster by September 22, 2009, utilizing the methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. PM10 includes filterable and condensable PM10. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Within 180 days after issuance of this permit T065-17992-00003, in order to determine compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform PM and PM-10 emission stack testing for Wheelabrator shotblaster, utilizing the methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. PM10 includes filterable and condensable PM10. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.2.6 Visible Emissions Notations [40 CFR 64]

Pursuant to 40 CFR 64 (CAM):

- (a) Visible emission notations of the 120" line shot blaster, and Wheelabrator shot blaster stacks exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not

counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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.2.7 Parametric Monitoring [40 CFR 64]

Pursuant to 40 CFR 64 (CAM), the Permittee shall record the pressure drop across each of the baghouses used in conjunction with the 120" line shot blaster, and Wheelabrator shot blaster, at least once per day when the process is in operation. When for any one reading, the pressure drop across any baghouse is outside the normal range of 2.0 and 6.0 inches of water 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, and shall be calibrated at least once every six (6) months.

D.2.8 Broken or Failed Bag Detection [40 CFR 64]

Pursuant to 40 CFR 64 (CAM):

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain a daily record of visible emission notations of the 120" line and Wheelabrator shotblaster stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the 20" line and Wheelabrator shotblasters. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- (c) 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 2-7-5(15)]

- (f) One (1) finish mill walking beam reheat furnace, installed in 1995 and rated at 21 million British thermal units per hour, exhausting inside the building.
- (g) One (1) 120" line annealing furnace, installed in 1996 and rated at 39.60 million British thermal units per hour, exhausting inside the building.
- (h) One (1) finish mill hot rolling, installed in 1977 and with a maximum capacity of 2.625 tons per hour, exhausting inside the building.
- (i) One (1) slab mill walking beam reheat furnace-1, installed in 1962 and rated at 43.30 million British thermal units per hour, exhausting to stack S-1.
- (j) One (1) slab mill reheat furnace-2, installed in 1962 and rated at 51.58 British thermal units per hour, exhausting inside the building.
- (k) One (1) slab mill hot rolling, installed in 1947 and with a maximum capacity of 4.566 tons per hour, exhausting inside the building.
- (l) One (1) Salem annealing furnace-1, installed in 1991 and rated at 32 million British thermal units per hour, exhausting inside the building.
- (m) One (1) Salem annealing furnace-2, installed in 1991 and rated at 32 million British thermal units per hour, exhausting inside the building.
- (n) One (1) Heppenstall annealing furnace, installed in 1980 and rated at 10.80 million British thermal units per hour, exhausting inside the building.
- (o) One (1) natural gas fired 120" line boiler, installed in 1996 and rated at 10.04 million British thermal units per hour and exhausting to stack S-5.

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

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

D.3.1 Particulate Matter Emission Limitation for Source of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the PM emissions from the one (1) 10.04 MMBtu/hr boiler (120" line boiler) shall be limited to 0.535 lb/MMBtu heat input based on the following formula:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [326 IAC 12] [40 CFR 60, Subpart Dc] [40 CFR 63, Subpart DDDDD]

D.3.2 New Source Performance Standard (NSPS) Record Keeping Requirements [326 IAC 12] [40 CFR 60, Subpart Dc] [40 CFR 63, Subpart DDDDD]

- (a) Pursuant to 326 IAC 12, the Permittee shall record and maintain records of the amounts of natural gas combusted in the 120" line boiler each day. This condition expires when the revisions made to 40 CFR 60 Subpart Dc, as amended on February 27, 2006, become effective as Indiana Law. This condition is not federally enforceable.
- (b) Pursuant to 40 CFR 60.48c(g), the Permittee shall record and maintain records of the amounts of natural gas combusted in the 120" line boiler during each calendar month.
- (c) Pursuant to 40 CFR 7506(b), the 120" line boiler is subject to only the initial notification requirements in 40 CFR 63.9(b) (i.e., it is not subject to the emission limits, work practice standards, performance testing, monitoring, SSMP, site-specific monitoring plans, recordkeeping and reporting requirements of 40 CFR 63, Subpart DDDDD or any other requirements in 40 CFR 63, Subpart A.).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour.
 - (1) One (1) natural gas fired boiler for batch pickling line with maximum heat input rating of 5.33 mmBtu/hr, installed in 1982. [326 IAC 6-2-4]
- (b) Degreasing operations, installed in 2001, that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 and 40 CFR 63, Subpart T. [326 IAC 8-3-2][326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
- (d) Walk Behind Grinder [326 IAC 6-3-2].
- (e) Belt Grinders [326 IAC 6-3-2].
- (f) Plasma Torch Cutter [326 IAC 6-3-2].
- (g) Shears [326 IAC 6-3-2].
- (h) One lime storage silo [326 IAC 6-3-2].

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

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

D.4.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (d), PM emissions from the boiler rated 5.33 MMBtu/hr, which began operation after June 8, 1972, shall be limited to 0.6 pounds of particulate matter per million British thermal units heat input.

D.4.2 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

These include the brazing equipment, cutting torches, soldering equipment, welding equipment, walk behind grinder, belt grinders, plasma torch cutter, shears, and lime storage silo.

D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for Immersion Cleaning Operation constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;

- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than,

- water.
- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

D.4.5 Record Keeping Requirements [40 CFR 63, Subpart DDDDD]

Pursuant to 40 CFR 7506(c), the affected boiler is not subject to the initial notification requirements in Sec. 63.9(b) and is not subject to any requirements in 40 CFR 63, subpart DDDDD or in subpart A (i.e., it is not subject to the emission limits, work practice standards, performance testing, monitoring, SSM plans, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart, or any other requirements in 40 CFR 63, subpart A.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Outokumpu Stainless, Inc., Plate Products
Source Address: 549 West State Road 38 New Castle Indiana 47632
Mailing Address: 549 West State Road 38 New Castle Indiana 47632
Part 70 Permit No.: T065-17992-00003

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61 -53 IGCN 1003
Indianapolis, Indiana 46204-2511
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Outokumpu Stainless, Inc., Plate Products
Source Address: 549 West State Road 38 New Castle Indiana 47632
Mailing Address: 549 West State Road 38 New Castle Indiana 47632
Part 70 Permit No.: T065-17992-00003

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); andC The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16. |
|--|

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

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

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

Page 2 of 2

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

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

Source Name: Outokumpu Stainless, Inc., Plate Products
 Source Address: 549 West State Road 38 New Castle Indiana 47632
 Mailing Address: 549 West State Road 38 New Castle Indiana 47632
 Part 70 Permit No.: T065-17992-00003

Months: _____ **to** _____ **Year:** _____

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Outokumpu Stainless, Inc.
Source Address: 549 West State Road 38, New Castle, IN 47362
Mailing Address: 549 West State Road 38, New Castle, IN 47362
Part 70 Permit No.: T065-17992-00003
Facility: 120" pickling line
Parameter: Metal throughput rate at 120" line pickling
Limit: Metal processed rate at 120" line pickling shall be limited to less than 151,500 tons per twelve (12) consecutive month period

YEAR:

Month	Column 1 Metal Throughput	Column 2 Metal Throughput	Column 1+ Column 2 Metal Throughput
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this month.

Deviation/s occurred in this month.

Deviation has been reported on:

Submitted by:
Title/Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

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

**Addendum to the
Technical Support Document for a Part 70 Operating Permit Renewal**

Source Name:	Outokumpu Stainless, Inc., Plate Products
Source Location:	549 West State Road 38, New Castle, IN 47632
County:	Henry
SIC Code:	3312
Operation Permit No.:	T065-7398-00003
Operation Permit Issuance Date:	June 15, 1999
Permit Renewal No.:	T065-17992-00003
Permit Reviewer:	Adeel Yousuf / EVP

On April 20, 2007, the Office of Air Quality (OAQ) had a notice published in The Courier Times in New Castle, Indiana stating that Outokumpu Stainless, Inc., Plate Products had applied for a Part 70 Operating Permit renewal relating to the operation of manufacturing rolled steel plates. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed Part 70 permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

On May 18, 2007, Lawrence Stapf, Project Engineer, of August Mack Environmental submitted comments on the proposed Part 70 renewal Permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

Permit page 5 of 44, Condition A.2 (e): the correct installation date for the Wheelabrator was 1980 (not 1994).

Response 1

Sections A.2(e) and D.2 have been revised to list the correct installation date as follows:

- (e) One (1) Wheelabrator shot blaster, installed in ~~1994~~ **1980** and with a maximum capacity of 36.0 tons per hour, using a baghouse as control device, and exhausting to stack B.

Comment 2

Permit page 6 of 44, Condition A.3 (a): the install date was 1982 (not 1979).

Response 2

Sections A.3(1) and D.3 have been revised to list the correct installation date as follows:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour.
 - (1) One (1) natural gas fired boiler for batch pickling line with maximum heat input rating of 5.33 mmBtu/hr, installed in ~~1979~~ **1982**. [326 IAC 6-2-4]

Comment 3

Permit page 5 of 44, Condition A.2 (d) and D.2 description (d) should be removed. The Pangborn shot blaster has been removed. The baghouse for that unit is still sitting there but is not used and not operational.

Permit page 30 of 44, Condition D.2.1: please remove Pangborn reference from the table in Condition D.2.1.

Permit page 31 of 44, Condition D.2.2 (a) and (b) referring to the PSD minor limit for the Pangborn should be removed.

Permit page 31 of 44, Condition D.2.5 (a): please remove the particulate control reference to the Pangborn shot blaster.

Permit page 32 of 44, Condition D.2.7 (a): please remove the visible emissions reference to the Pangborn shot blaster.

Permit page 32 of 44, Condition D.2.8: please remove the parametric monitoring reference to the Pangborn shot blaster in the first paragraph.

Permit page 33 of 44, Condition D.2.10 (a) and (b): please remove the record keeping reference to the Pangborn shot blaster.

Response 3

Pangborn shotblaster has been removed from the permit as requested. Sections A.2 and D.2 have been revised as follows:

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

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

- ~~(d) One (1) Pangborn shot blaster, installed in 1966 and with a maximum capacity of 5.137 tons per hour, using a baghouse as control device, and exhausting to stack A.~~
- (e)(d)** One (1) Wheelabrator shot blaster, installed in 1980 and with a maximum capacity of 36.0 tons per hour, using a baghouse as control device, and exhausting to stack B.

- ~~(f)~~(e) One (1) finish mill walking beam reheat furnace, installed in 1995 and rated at 21 million British thermal units per hour, exhausting inside the building.
- ~~(g)~~(f) One (1) 120" line annealing furnace, installed in 1996 and rated at 39.60 million British thermal units per hour, exhausting inside the building.
- ~~(h)~~(g) One (1) finish mill hot rolling, installed in 1977 and with a maximum capacity of 2.625 tons per hour, exhausting inside the building.
- ~~(i)~~(h) One (1) slab mill walking beam reheat furnace-1, installed in 1962 and rated at 43.30 million British thermal units per hour, exhausting to stack S-1.
- ~~(j)~~(i) One (1) slab mill reheat furnace-2, installed in 1962 and rated at 51.58 British thermal units per hour, exhausting inside the building.
- ~~(k)~~(j) One (1) slab mill hot rolling, installed in 1947 and with a maximum capacity of 4.566 tons per hour, exhausting inside the building.
- ~~(l)~~(k) One (1) Salem annealing furnace-1, installed in 1991 and rated at 32 million British thermal units per hour, exhausting inside the building.
- ~~(m)~~(l) One (1) Salem annealing furnace-2, installed in 1991 and rated at 32 million British thermal units per hour, exhausting inside the building.
- ~~(n)~~(m) One (1) Heppenstall annealing furnace, installed in 1980 and rated at 10.80 million British thermal units per hour, exhausting inside the building.
- ~~(o)~~(n) One (1) natural gas fired 120" line boiler, installed in 1996 and rated at 10.04 million British thermal units per hour and exhausting to stack S-5.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (c) One (1) 120" line shot blaster, installed in 1996, with a maximum capacity of 30 tons per hour, equipped with a baghouse as control device, and exhausting to stack C.
- ~~(d) One (1) Pangborn shot blaster, installed in 1966 and with a maximum capacity of 5.137 tons per hour, using a baghouse as control device, and exhausting to stack A.~~
- ~~(e)~~(d) One (1) Wheelabrator shot blaster, installed in 1980 and with a maximum capacity of 36 tons per hour, using a baghouse as control device, and exhausting to stack B.

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emissions from the following facilities shall not exceed the limits as stated when operating at the respective process weight rates:

Emission Unit	Process Weight Rate (tons/hr)	Allowable Particulate Emission Rate (326 IAC 6-3-2) (lb/hr)
120" line shot blaster	30.0	40.0
Pangborn shot blaster	5.14	12.3
Wheelabrator shot blaster	36.0	45.2

~~D.2.2~~ PSD Minor Limit [326 IAC 2-2]

~~(a) The PM emissions from the Pangborn shotblaster shall not exceed 12.27 pounds per hour.~~

~~(b) The PM10 emissions from the Pangborn shotblaster shall not exceed 12.27 pounds per hour.~~

~~Compliance with above limits shall render 326 IAC 2-2 (PSD) not applicable to the Pangborn shotblaster installed in 1966.~~

~~D.2.3~~ **D.2.2** PSD Minor Limit [326 IAC 2-2]

(a) The PM emissions from the Wheelabrator shotblaster shall not exceed 41.42 pounds per hour.

(b) The PM10 emissions from the Wheelabrator shotblaster shall not exceed 41.42 pounds per hour.

Compliance with above limits shall render 326 IAC 2-2 (PSD) not applicable to the Wheelabrator shotblaster installed in 1994.

~~D.2.4~~ **D.2.3** PSD Minor Limit [326 IAC 2-2]

(a) The PM emissions from the 120" line shotblaster shall not exceed 21.88 pounds per hour.

(b) The PM10 emissions from the 120" line shotblaster shall not exceed 21.88 pounds per hour.

Compliance with above limits in combination with Condition D.1.2, shall keep PM and PM10 emissions from the 1996 source modification to less than 250 tons per year, each, and shall render 326 IAC 2-2 (PSD) not applicable to the 1996 source modification.

Compliance Determination Requirements

~~D.2.5~~ **D.2.4** Particulate Control

(a) In order to comply with Conditions D.2.1, ~~D.2.2~~, ~~D.2.3~~, **D.2.2** and ~~D.2.4~~ **D.2.3** the baghouses for particulate control shall be in operation and control emissions from the 120" line shot blaster, Pangborn shot blaster, and Wheelabrator shot blaster at all times that the 120" line shot blaster, Pangborn shot blaster, and Wheelabrator shot blaster are in operation.

~~D.2.6~~**D.2.5** Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) In order to determine compliance with Conditions ~~D.2.4~~ **D.2.3**, the Permittee shall perform PM and PM10 emissions stack testing for 120" line shotblaster by September 22, 2009, utilizing the methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. PM10 includes filterable and condensible PM10. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Within 180 days after issuance of this permit T065-17992-00003, in order to determine compliance with Conditions D.2.1, ~~D.2.2~~, and ~~D.2.3~~ **D.2.2**, the Permittee shall perform PM and PM-10 emission stack testing for Wheelabrator shotblaster, utilizing the methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. PM10 includes filterable and condensible PM10. Testing shall be conducted in accordance with Section C - Performance Testing.

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

~~D.2.7~~**D.2.6** Visible Emissions Notations [40 CFR 64]

Pursuant to 40 CFR 64 (CAM):

- (a) Visible emission notations of the 120" line shot blaster, ~~Pangborn shot blaster~~, and Wheelabrator shot blaster stacks exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

~~D.2.8~~**D.2.7** Parametric Monitoring [40 CFR 64]

Pursuant to 40 CFR 64 (CAM), the Permittee shall record the pressure drop across each of the baghouses used in conjunction with the 120" line shot blaster, ~~Pangborn shot blaster~~, and Wheelabrator shot blaster, at least once per day when the process is in operation. When for any one reading, the pressure drop across any baghouse is outside the normal range of 2.0 and 6.0 inches of water 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, and shall be calibrated at least once every six (6) months.

~~D.2.9~~**D.2.8** Broken or Failed Bag Detection [40 CFR 64]

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

~~D.2.10~~**D.2.9** Record Keeping Requirements

- (a) To document compliance with Condition ~~D.2.7~~ **D.2.6**, the Permittee shall maintain a daily record of visible emission notations of the 120" line, ~~Pangborn~~, and Wheelabrator shotblaster stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).

- (b) To document compliance with Condition ~~D-2.8~~ **D.2.7**, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the 20" line, ~~Pangborn~~, and Wheelabrator shotblasters. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).

Comment 4

TSD Appendix A, pages 1, 2 and 8 of 26: The Pangborn emissions no longer apply. Please remove.

Response 4

The Technical Support Document is revised in this addendum as shown below (**bolded** language has been added, the language with a line through it has been deleted). The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

1. Appendix A, pages 1 and 2 of 26 have been revised to remove the emissions from the pangborn shotblaster (see attached ATSD Appendix A, pages 1 through 25).
2. Technical Support Document has been updated to remove pangborn shotblaster as follows:

Permitted Emission Units and Pollution Control Equipment

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

- ~~(d) One (1) Pangborn shot blaster, installed in 1966 and with a maximum capacity of 5.137 tons per hour, using a baghouse as control device, and exhausting to stack A.~~

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Limited Potential to Emit (tons/year)								
	Const. / Mod. Date	PM	PM-10	SO ₂	NO _x	VOC	CO	HAP (single)	HAPS (total)
Batch Pickling	1944	7.49	7.49	0.00	17.98	--	--	4.64 (HF)	7.49
Slab Hot Rolling	1947	--	--	--	--	1.60	--	--	--
Slab Mill Fur 1. (natural gas combustion)	1962	0.36	1.44	0.11	18.97	1.04	15.93	negligible	negligible
Slab Mill Fur 2. (natural gas combustion)	1962	0.43	1.72	0.14	22.59	1.24	18.98	negligible	negligible
Shot Blasting (Pang-)	1966	53.74	53.74	--	--	--	--	--	--
Finish Hot Rolling	1977	--	--	--	--	0.92	--	--	--
Heppenstall Fur. (natural gas combustion)	1980	0.09	0.36	0.03	4.73	0.26	3.97	negligible	negligible
Shot Blasting (Wheelabrator)	1980	181.42	181.42	--	--	--	--	--	--
Subtotal:		62.11 189.79	64.75 192.43	0.28	64.27	5.06	38.88	4.64 (HF)	7.49
Two (2) Salem Fur. (natural gas combustion)	1991	0.53	2.13	0.17	28.03	1.54	23.55	negligible	negligible
Subtotal:		0.53	2.13	0.17	28.03	1.54	23.55	negligible	negligible
Shot Blasting (Wheelabrator)	1994	481.42	481.42	--	--	--	--	--	--
Subtotal:		481.42	481.42	--	--	--	--	--	--
Finish Mill Fur. (natural gas combustion)	1995	0.17	0.70	0.06	9.20	0.51	7.73	negligible	negligible
Subtotal:		0.17	0.70	0.06	9.20	0.51	7.73	negligible	negligible
<i>Total Emissions before 1996 Modification:</i>		244.23 190.49	249.0 195.26	0.51	101.50	7.11	70.16	4.64 (HF)	7.49
120" Annealing Fur.	1996	0.33	1.32	0.10	17.34	0.95	14.57	negligible	negligible
120" Line Boiler (natural gas combustion)	1996	0.08	0.33	0.03	4.40	0.24	3.69	negligible	negligible
120" line shot blaster	1996	95.85	95.85	--	--	--	--	--	--
120" line pickling	1996	151.50	151.50	--	227.26	--	--	75.75 (HF)	75.75
Subtotal:		247.76	249.0	0.13	249.0	1.19	18.26	75.75 (HF)	75.75
Batch Pickling Boiler (natural gas combustion)	2002	0.04	0.18	0.01	2.33	0.13	1.96	negligible	negligible
Subtotal:		0.04	0.18	0.01	2.33	0.13	1.96	negligible	negligible
Total PTE		492.03 438.29	498.18 444.44	0.65	352.83	8.43	90.38	80.39	83.24

State Rule Applicability – Entire Source

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

The source was constructed in 1944, before the PSD applicability of August 7, 1980.

~~(a) One (1) shotblasters identified as Pangborn, constructed in 1966 shall be subject to the following PM emission limit because uncontrolled PM emissions are greater than 250 tons per year:~~

~~The PM emissions from the Pangborn shotblaster shall not exceed 12.27 pounds per hour.~~

~~Compliance with above PM emission limit shall render the requirements of 326 IAC 2-2 (PSD) not applicable to Pangborn shotblaster.~~

State Rule Applicability – Individual Facilities

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

(a) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from the following facilities shall not exceed the limits as stated when operating at the respective process weight rates:

Emission Unit	Process Weight Rate (tons/hr)	Controlled PM Emissions (lb/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
120" line shot blaster	30	3.0	40.03
120" line pickling	30	4.32*	40.03
Pangborn shot blaster	5.14	2.47	12.27
Wheelabrator shot blaster	36.0	2.47	45.23
Batch Pickling	15.0	1.71	25.16

* See page 10 of 26 of TSD Appendix A for emission calculations

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

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

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

and

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

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

The dust collectors for the 120" line shot blaster, ~~Pagborn shot blaster~~, and Wheelabrator shot blaster shall be in operation at all times these emission units are in operation, in order to comply with this limit.

Testing Requirements

326 IAC 2-7-6(1),(6), 326 IAC 2-1.1-11 (Testing Requirements)

The Permittee shall conduct PM and PM10 stack test for Wheelabrator ~~and Pangborn shotblasters~~ **shotblaster** within one hundred and eighty (180) days of issuance of this permit. Since the control device (baghouses) have not been tested, and their proper operation is required for the source to comply with 326 IAC 2-2 (PSD Minor Limit), the source shall be required to conduct testing.

Compliance Requirements

The compliance monitoring requirements applicable to this source are as follows:

- (1) The 120 " line shotblast, ~~Pangborn shot blaster~~, and Wheelbrator shot blaster have applicable compliance monitoring conditions as specified below:
 - (a) The Permittee shall record the pressure drop across each of the baghouses used in conjunction with the Wheelabrator shot blasting process, **and** 120" line shot blaster, ~~and Pangborn shot blaster~~, at least once per day when the process is in operation. When for any one reading, the pressure drop across any baghouse is outside the normal range of 2.0 and 6.0 inches of water 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, and shall be calibrated at least once every six (6) months.

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

Upon further review, OAQ has determined the following changes (bolded language has been added and the language with a line through it has been deleted) will be made to the permit:

1. The following addresses throughout the permit have been revised to include the mailing codes for each respective department. Mailing code MC61-50 has been added for Technical Support and Modeling addresses. Mailing code MC61-52 has been added for Asbestos Section addresses. Mailing code MC61-53 has been added for Permits Branch, Compliance Branch, Compliance Data Section addresses, and to the cover page of the permit.

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

MC 61-50 IGCN 1003

Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue

MC 61-52 IGCN 1003

Indianapolis, Indiana 46204-2251

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

MC 61-53 IGCN 1003

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Compliance Data Section, Office of Air Quality
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Permits Branch, Office of Air Quality
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**Indiana Department of Environmental Management
Office of Air Quality**

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

Source Background and Description

Source Name:	Outokumpu Stainless, Inc., Plate Products
Source Location:	549 West State Road 38 New Castle, IN 47632
County:	Henry
SIC Code:	3312
Operation Permit No.:	T065-7398-00003
Operation Permit Issuance Date:	June 15, 1999
Permit Renewal No.:	T065-17992-00003
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Outokumpu Stainless, Inc. relating to the operation of manufacturing rolled steel plates.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) 120" line pickling, installed in 1996, with a maximum capacity of 30 tons per hour, equipped with an optional wet scrubber as control device, and exhausting to stack E.
- (b) One (1) Batch pickling line, installed in 1944 and with a maximum capacity of 15 tons per hour, exhausting inside the building.
- (c) One (1) 120" line shot blaster, installed in 1996, with a maximum capacity of 30 tons per hour, equipped with a baghouse as control device, and exhausting to stack C.
- (d) One (1) Pangborn shot blaster, installed in 1966 and with a maximum capacity of 5.137 tons per hour, using a baghouse as control device, and exhausting to stack A.
- (e) One (1) Wheelabrator shot blaster, installed in 1994 and with a maximum capacity of 36.0 tons per hour, using a baghouse as control device, and exhausting to stack B.
- (f) One (1) finish mill walking beam reheat furnace, installed in 1995 and rated at 21 million British thermal units per hour, exhausting inside the building.
- (g) One (1) 120" line annealing furnace, installed in 1996 and rated at 39.60 million British thermal units per hour, exhausting inside the building.
- (h) One (1) finish mill hot rolling, installed in 1977 and with a maximum capacity of 2.625 tons per hour, exhausting inside the building.
- (i) One (1) slab mill walking beam reheat furnace-1, installed in 1962 and rated at 43.30 million British thermal units per hour, exhausting to stack S-1.
- (j) One (1) slab mill reheat furnace-2, installed in 1962 and rated at 51.58 British thermal units per hour, exhausting inside the building.

- (k) One (1) slab mill hot rolling, installed in 1947 and with a maximum capacity of 4.566 tons per hour, exhausting inside the building.
- (l) One (1) Salem annealing furnace-1, installed in 1991 and rated at 32 million British thermal units per hour, exhausting inside the building.
- (m) One (1) Salem annealing furnace-2, installed in 1991 and rated at 32 million British thermal units per hour, exhausting inside the building.
- (n) One (1) Heppenstall annealing furnace, installed in 1980 and rated at 10.80 million British thermal units per hour, exhausting inside the building.
- (o) One (1) natural gas fired 120" line boiler, installed in 1996 and rated at 10.04 million British thermal units per hour and exhausting to stack S-5.

Note:

The source has requested to change the batch pickling line maximum throughput capacity from 5.25 to 15.0 tons per hour and Wheelabrator shot blasting maximum throughput capacity from 5.14 to 36.0 tons per hour. The increases in throughput are due to unrealized throughput potential for the batch pickling and shot blasting processes. When these processes were initially permitted, the reported capacities for these units were based on foreseeable actual capacities and not on the true maximum capacity of the unit. No reconstruction or modifications have occurred on these units in order to allow for the increase in maximum capacity. The previously reported capacities were made in error.

Emission Units Removed from the Source

The following emission units have been removed from the source.

- (a) One (1) powder torch cutting unit, with a maximum capacity of 82,125 tons per year, using a baghouse as control device, and exhausting to stack D.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour.
 - (1) One (1) natural gas fired boiler for batch pickling line with maximum heat input rating of 5.33 mmBtu/hr, installed in 1979. [326 IAC 6-2-3]
- (b) Combustion source flame safety purging on startup.
- (c) A gasoline fuel transfer and dispensing operating handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

- (e) The following VOC and HAP storage containers: vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Refractory storage not requiring air pollution control equipment.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Degreasing operations, installed in 2001, that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 and 40 CFR 63, Subpart T. [326 IAC 8-3-5] [326 IAC 8-3-2]
- (i) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
- (k) Rolling oil recovery system.
- (l) Quenching operations used with heat treating processes.
- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (n) Paved and unpaved roads and parking lots with public access.
- (o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (q) Walk Behind Grinder [326 IAC 6-3-2].
- (r) Belt Grinders [326 IAC 6-3-2].
- (s) Plasma Torch Cutter [326 IAC 6-3-2].
- (t) Shears [326 IAC 6-3-2].
- (u) One lime storage silo [326 IAC 6-3-2].
- (v) Plate Marking Machine
- (w) Forklifts using propane fueled combustion engines with heat input less than six (6) MMBtu/ hr.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Part 70 permit No. T065-7398-00003, issued on June 15, 1999;
- (b) First part 70 re-opening No.065-13316-00003, issued on November 12, 2001;
- (c) First Administrative Amendment No. 065-14117-00003, issued on April 10, 2001;
- (d) First Significant Source Modification No. 065-18458-00003, issued on June 25, 2004.

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

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on December 31, 2003. Additional information was received on August 2, 2004.

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

Emission Calculations

See Appendix A of this document for detailed emissions calculations (twenty six (26) pages).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	Greater than 250
PM-10	Greater than 250
SO ₂	Less than 100
VOC	Less than 250
CO	Less than 100
NO _x	Greater than 250

HAPs	Unrestricted Potential Emissions (tons/yr)
Hydrofluoric Acid	Greater than 10
Nitric Acid	Less than 10
Total	Greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM 10 and NO_x is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Limited Potential to Emit (tons/year)								
	Const. / Mod. Date	PM	PM-10	SO ₂	NO _x	VOC	CO	HAP (single)	HAPS (total)
Batch Pickling	1944	7.49	7.49	0.00	17.98	--	--	4.64 (HF)	7.49
Slab Hot Rolling	1947	--	--	--	--	1.60	--	--	--
Slab Mill Fur 1. (natural gas combustion)	1962	0.36	1.44	0.11	18.97	1.04	15.93	negligible	negligible
Slab Mill Fur 2. (natural gas combustion)	1962	0.43	1.72	0.14	22.59	1.24	18.98	negligible	negligible
Shot Blasting (Pang.)	1966	53.74	53.74	--	--	--	--	--	--
Finish Hot Rolling	1977	--	--	--	--	0.92	--	--	--
Heppenstall Fur. (natural gas combustion)	1980	0.09	0.36	0.03	4.73	0.26	3.97	negligible	negligible
Subtotal:		62.11	64.75	0.28	64.27	5.06	38.88	4.64 (HF)	7.49
Two (2) Salem Fur. (natural gas combustion)	1991	0.53	2.13	0.17	28.03	1.54	23.55	negligible	negligible
Subtotal:		0.53	2.13	0.17	28.03	1.54	23.55	negligible	negligible
Shot Blasting (Wheelabrator)	1994	181.42	181.42	--	--	--	--	--	--
Subtotal:		181.42	181.42	--	--	--	--	--	--
Finish Mill Fur. (natural gas combustion)	1995	0.17	0.70	0.06	9.20	0.51	7.73	negligible	negligible
Subtotal:		0.17	0.70	0.06	9.20	0.51	7.73	negligible	negligible
Total Emissions before 1996 Modification:		244.23	249.0	0.51	101.50	7.11	70.16	4.64 (HF)	7.49
120" Annealing Fur.	1996	0.33	1.32	0.10	17.34	0.95	14.57	negligible	negligible
120" Line Boiler (natural gas combustion)	1996	0.08	0.33	0.03	4.40	0.24	3.69	negligible	negligible
120" line shot blaster	1996	95.85	95.85	--	--	--	--	--	--
120" line pickling	1996	151.50	151.50	--	227.26	--	--	75.75 (HF)	75.75
Subtotal:		247.76	249.0	0.13	249.0	1.19	18.26	75.75 (HF)	75.75
Batch Pickling Boiler (natural gas combustion)	2002	0.04	0.18	0.01	2.33	0.13	1.96	negligible	negligible
Subtotal:		0.04	0.18	0.01	2.33	0.13	1.96	negligible	negligible
Total PTE		492.03	498.18	0.65	352.83	8.43	90.38	80.39	83.24

- (a) This existing stationary source is major for PSD because the emissions of at least one attainment pollutant are greater than two hundred fifty (>250) tons per year, and is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	11.3
PM-10	71.3
SO ₂	0.08
NO _x	120.6
VOC	0.75
CO	10.6
Lead	N/A

County Attainment Status

The source is located in Henry County.

Pollutant	Status
PM-10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hr Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) 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. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Henry County has been designated as attainment or unclassifiable for 8-hour ozone standards. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Henry County has been classified as attainment for PM2.5. 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 PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.

- (c) Henry County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) are not included in the permit for one (1) batch pickling boiler, with a maximum heat input capacity of 5.33 MMBtu per hour because the boiler's capacity is less than the rule applicability threshold of 10 MMBtu per hour.
- (b) The one (1) 10.04 MMBtu per hour natural gas fired boiler for 120" line boiler, constructed in 1996, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because it was constructed after June 9, 1989, and has a maximum design heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour.

Nonapplicable portions of the NSPS will not be included in the permit. The boiler is subject to the following portions of Subpart Dc:

- (1) 40 CFR 60.40c (a)
- (2) 40 CFR 60.41c
- (3) 40 CFR 60.48c (g)

The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the boiler described in this section except when otherwise specified in 40 CFR 60, Subpart Dc.

40 CFR 60, Subpart Dc was amended February 27, 2006 under Federal Register notice 71 FR 9884. However, pursuant to 326 IAC 1-1-3, the version of the rule referenced by 326 IAC 12 is the version in existence on July 1, 2005. Therefore, the amendments are not included in the state rules, and the boilers at this source are subject to both versions of the rule. All the requirements of 326 IAC 12 are the same as the requirements listed under Federal Rule Applicability except 40 CFR 60.48c(g).

Since the requirement of the old version of rule 40 CFR 60.48c(g) is more stringent than the amended version of rule 40 CFR 60.48c(g), the old rule 40 CFR 60.48c(g) will be also applicable to the boilers. The condition to comply with the requirements of the old rule 40 CFR 60.48c(g) shall expire when the revisions made to 40 CFR 60 Subpart Dc, as amended on February 27, 2006, become effective as Indiana Law. This condition is not federally enforceable.

- (c) The one (1) batch pickling line boiler, with a maximum heat input capacity of 5.33 MMBtu per hour is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The boiler is part of the affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7575, because it has a rated capacity of less than or equal to 10 million British thermal units per hour heat input.

However, pursuant to 40 CFR 63.7506(c), the affected boiler is not subject to the initial notification requirements in Sec. 63.9(b) and is not subject to any requirements in 40 CFR 63, subpart DDDDD or in subpart A (i.e., it is not subject to the emission limits, work practice standards, performance testing, monitoring, SSM plans, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart, or any other requirements in 40 CFR 63, subpart A.

- (d) The one (1) 120" line 10.04 MMBtu natural gas fired boiler is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The boiler comprises one existing affected source for the large gaseous fuel subcategory, as defined by 40 CFR 63.7506(b), because it meets the criteria in the definition in 40 CFR 63.7575 for the large gaseous fuel subcategory. The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source after the effective date of 40 CFR 63, Subpart DDDDD, except when otherwise specified in 40 CFR 63 Subpart DDDDD. This rule was published in the *Federal Register* on September 13, 2004. A copy of the signed, final rule is available at <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

The existing boiler is subject to only the initial notification requirements in 40 CFR 63.9(b) (i.e., it is not subject to the emission limits, work practice standards, performance testing, monitoring, SSMP, sitespecific monitoring plans, recordkeeping and reporting requirements of this subpart or any other requirements in 40 CFR 63, subpart A). The boiler is subject to the following portions of Subpart DDDDD:

- (1) 40 CFR 63.7485
- (2) 40 CFR 63.7490(a)(1) and (d)
- (3) 40 CFR 63.7495(b)
- (4) 40 CFR 63.7499
- (5) 40 CFR 63.7506(b)(1)
- (6) 40 CFR 63.7545(a) & (b)(1)
- (7) 40 CFR 63.7575

Pursuant to 40 CFR 63.7506(b), the only requirements that apply to the existing affected source for the large gaseous fuel subcategory, are the initial notification requirements in 40 CFR 63.9(b). The Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the effective date of 40 CFR 63, Subpart DDDDD as required by 40 CFR 63.7545(b).

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.4480, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products) (326 IAC 20-28) are not included in the permit since this source does not engage in surface coating of plastic parts.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63, Subpart CCC, National Emission Standards for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants are not included in the permit since the source does not use hydrochloric acid for pickling stainless steel plates.
- (g) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
 - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
 - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
 - (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source was issued initial Part 70 permit no. T065-7398-00003, on June 15, 1999. The 120" line pickling as PSEU has uncontrolled PTE of NO_x and PM₁₀ at greater than 100 percent of the applicable major Part 70 threshold and is subject to an emission limitation. However, the 120" line pickling does not use a control device to comply with the emission limitation. Therefore 40 CFR Part 64, Compliance Assurance Monitoring, is not applicable to the 120" line pickling.

The Wheelabrator shot blasting process and 120" shot blasting operation at this Part 70 source, each has uncontrolled PTE of PM of greater than 100 tons per year, and uses a control device (dust collector) as defined in 40 CFR 64.1 to comply with an emission limitation or standard under 326 IAC 6-3-2(e). Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to the Wheelabrator shot blasting process and the 120" shot blasting operation.

The following CAM plan, which was submitted by the source, shall satisfy the 40 CFR 64 Compliance Assurance Monitoring requirements.

- (i) The Permittee shall record the pressure drop across each of the baghouses used in conjunction with the Wheelabrator shot blasting process and the 120" shot blasting operation, at least once per day when the process is in operation. When for any one reading, the pressure drop across any baghouse is outside the normal range of 2.0 and 6.0 inches of water 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, and shall be calibrated at least once every six (6) months.

- (ii) Broken or Failed Bag Detection:
 - (A) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
 - (B) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

- (iii) Visible emission notations of the stack exhaust (C and B) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

All other emission units as PSEUs have uncontrolled PTE less than 100 percent of applicable major Part 70 threshold. Therefore, the 40 CFR Part 64, Compliance Assurance Monitoring, is not applicable to any other emission unit.

State Rule Applicability – Entire Source

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

The source was constructed in 1944, before the PSD applicability of August 7, 1980.

- (a) One (1) shotblasters identified as Pangborn, constructed in 1966 shall be subject to the following PM emission limit because uncontrolled PM emissions are greater than 250 tons per year:

The PM emissions from the Pangborn shotblaster shall not exceed 12.27 pounds per hour.

Compliance with above PM emission limit shall render the requirements of 326 IAC 2-2 (PSD) not applicable to Pangborn shotblaster.

- (b) The Wheelabrator shotblaster constructed in 1994 shall be subject to the following PM emission limit because uncontrolled PM emissions are greater than 250 tons per year:

The PM emissions from the Wheelabrator shotblaster shall not exceed 41.42 pounds per hour.

Compliance with above PM emission limit shall render the requirements of 326 IAC 2-2 (PSD) not applicable to Wheelabrator shotblaster.

- (c) In 1995, PM10 became a regulated pollutant under 326 IAC 2-2 (PSD). Since the sourcewide PM10 emissions exceeded 250 tons per year, the two shotblasters identified as Pangborn and Wheelabrator shall be subject to the following PM10 emission limits:

(1) The PM10 emissions from the Pangborn shotblaster shall not exceed 12.27 pound per hour.

(2) The PM10 emissions from the Wheelabrator shotblaster shall not exceed 41.42 pounds per hour.

Compliance with above PM10 emission limits shall render the requirements of 326 IAC 2-2 (PSD) not applicable to Pangborn and Wheelabrator shotblasters.

- (d) The unrestricted potential to emit of PM, PM10, and NOx from the 1996 modification were over 250 tons per year, each. Therefore, the PM, PM10, and NOx emissions shall be limited as follows:

(1) The PM emissions from the 120" line shotblaster shall not exceed 21.88 pounds per hour.

(2) The PM10 emissions from the 120" line shotblaster shall not exceed 21.88 pounds per hour.

(3) The PM emissions from the 120" line pickling shall not exceed 2.00 pounds per ton of material processed.

(4) The PM10 emissions from the 120" line pickling shall not exceed 2.00 pounds per ton of material processed.

(5) The input of metal processed in the 120" line pickling shall be limited to less than 151,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month and the NOx emission rate from the 120" line pickling shall not exceed 3.0 pounds per tons of material processed. This limit will limit the NOx emissions from the 120" line pickling to less than 227 tons per twelve consecutive month period.

Compliance with the above limits in combination with potential PM, PM10, and NOx emissions from 120" line boiler and 120" line annealing furnace will limit the PM, PM10, and NOx emissions from the 1996 modification to less than 250 tons per twelve consecutive month period, each.

The permit limits established in the Significant Source Modification No. 065-18458-00003, issued on June 25, 2004 are voided by this permit because the limits have to be re-established based on the correct maximum capacities in the year 1996, the year in which the modification took place.

After the 1996 modification, the source became a major source under the 326 IAC 2-2 (PSD) rule since the sourcewide limited PM, PM10, and NOx emissions were greater than 250 tons per year.

In this Title V renewal permit, the source has requested to change the batch pickling line maximum throughput capacity from 5.25 to 15.0 tons per hour and Wheelabrator shot blasting maximum throughput capacity from 5.14 to 36.0 tons per hour, the construction of which took place in 1996. No reconstruction or modifications have occurred on these units in order to allow for the increase in maximum capacity. The previously reported capacities were made in error. The potential emissions from the batch pickling were based on the maximum hourly evaporation rates of the solution contained in each acid bath; therefore, increasing the maximum hourly metal throughput rate will not affect the overall emissions generated from this process.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2005 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

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

The operation of 120" line pickling will emit greater than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. However, 326 IAC 2-4.1 will not apply, because the 120" line pickling was built prior to applicability date of July 27, 1997.

State Rule Applicability – Individual Facilities

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

- (a) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from the following facilities shall not exceed the limits as stated when operating at the respective process weight rates:

Emission Unit	Process Weight Rate (tons/hr)	Controlled PM Emissions (lb/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
120" line shot blaster	30	3.0	40.03
120" line pickling	30	4.32*	40.03
Pangborn shot blaster	5.14	2.47	12.27
Wheelabrator shot blaster	36.0	2.47	45.23
Batch Pickling	15.0	1.71	25.16

* See page 10 of 26 of TSD Appendix A for emission calculations

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

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

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

and

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

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

The dust collectors for the 120" line shot blaster, Pagborn shot blaster, and Wheelabrator shot blaster shall be in operation at all times these emission units are in operation, in order to comply with this limit.

The 120" line pickling was tested on September 22, 2004 with out any control on and PM emissions were determined to be 1.34 lb/hr which is less than the allowable emission rate of 40.03 lb/hr, therefore, 120" line pickling can comply with 326 IAC 6-3-2 without a control device.

- (b) The following operations are not subject to 326 IAC 6-3-2(e) since there are no process related particulate matter emissions:

Finish mill walking beam reheat furnace, 120" line annealing furnace, Finish mill hot rolling, Slab mill walking beam reheat furnace-1, Slab mill walking reheat furnace-2, Slab mill hot rolling, Salem annealing furnace-1, Salem annealing furnace-2, and Happenstall annealing furnace.

The reheat furnaces reheat the stainless steel slabs and plates in order to make the stainless steel more workable (i.e., easier to roll). No steel is lost in this process and no additional chemicals are utilized which would generate criteria pollutants. Therefore, the only emissions generated from these units are due to combustion of natural gas. Following the hot rolling process, the plates are sent to an annealing furnace. These furnaces are utilized to improve the internal structure of the plates. Again, no steel is lost in this process and no additional chemicals are utilized which would generate criteria pollutants. Therefore, the only emissions generated from these units are due to combustion of natural gas.

- (c) The throughput of insignificant activities identified as brazing equipment, cutting torches, soldering equipment, welding equipment is less than 100 pounds per hour and the potential PM emissions less than 0.551 lb/hr. Pursuant to 326 IAC 6-3-2(e)(2), these processes are exempt from this rule.

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

The one natural gas fired boiler, rated at maximum capacity of 5.33 MMBtu/hr and constructed in 1979, is subject to the particulate limitations of 326 IAC 6-2. Pursuant to 326 IAC 6-2-3(a), the particulate emissions from indirect heating facilities which were existing and in operation before September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

C = 50 u/m³
Pt = emission rate limit (lbs/mmBtu)
Q = total source heat input capacity (mmBtu/hr)
N = number of stacks
a = plume rise factor (0.67)
h = stack height in feet. If a number of stacks of different heights exist, average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times p a_i \times Q}{\sum_{i=1}^N p a_i \times Q}$$

where: Pa = the actual controlled emissions rate in lb/mmBtu using the emission factor form AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

$$Pt = (50 * 0.67 * 16) / (76.5 * 5.33^{0.75} * 1^{0.25}) = 2.0 \text{ lbs PM/mmBtu}$$

Pursuant to 326 IAC 6-2-3 (e), particulate emissions from any facility used for indirect heating purposes which has 250 MMBtu/hr heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 lb/MMBtu heat input.

Since the limit calculated based on 326 IAC 6-2-3 (a) of 2.0 lb/MMBtu is greater than the limit established by 326 IAC 6-2-3 (e) of 0.6 lb/MMBtu, the PM emissions from the 5.33 MMBtu/hr boiler are limited to 0.6 lb/MMBtu.

Compliance calculation:

$$(0.04 \text{ tons PM/yr}) * (\text{hr}/5.33 \text{ MMBtu}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.0017 \text{ lbs PM/MMBtu}$$

Actual lbs PM/MMBtu (0.001) is less than allowable lbs PM/MMBtu (0.60), therefore the boiler will be able to comply with the requirements of 326 IAC 6-2-4.

326 IAC 6-2-4 (Particulate emission limitations for source of indirect heating)

The one (1) natural gas fired boiler, identified as 120" line boiler (constructed in 1996), rated at 10.04 MMBtu per hour is subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = 1.09 / (Q^{0.26})$$

where Pt = rate of emission in pounds per MMBtu heat input.
Q = total source maximum operating capacity in MMBtu/hr = 10.04 + 5.33
= 15.37 MMBtu/hr

$$Pt = 1.09 / (15.37)^{0.26} \\ = 0.535 \text{ lb/ MMBtu}$$

Therefore, particulate emissions from the 10.04 MMBtu/hr boiler shall not exceed 0.535 lb/MMBtu.

Compliance calculation:

$(0.08 \text{ tons PM/yr}) * (\text{hr}/15.37 \text{ MMBtu}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.001 \text{ lbs PM/MMBtu}$

Actual lbs PM/MMBtu (0.001) is less than allowable lbs PM/MMBtu (0.535), therefore the boiler will be able to comply with the requirements of 326 IAC 6-2-4.

326 IAC 8-3-2 (Cold Cleaner Operations)

- (a) The degreasing operations listed as an insignificant activities, are subject to the requirements of 326 IAC 8-3-2 (Cold cleaner operation) since each was constructed after January 1, 1980. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations the owner or operator shall:
- (1) Equip the cleaner with a cover;
 - (2) Equip the cleaner with a facility for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label summarizing the operation requirements;
 - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Operations)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations)

This source is not subject to 326 IAC 6-5 for fugitive particulate matter emissions. Pursuant to 326 IAC 6-5, for any new sources constructed after December 13, 1985, a fugitive dust control plan must be submitted, reviewed and approved. The source was constructed in 1944, therefore the requirements of 326 IAC 6-5 do not apply.

Testing Requirements

326 IAC 2-7-6(1),(6), 326 IAC 2-1.1-11 (Testing Requirements)

The Permittee performed a PM and NOx emission test for 120" line pickling (without control) as required in SSM 065-18458-00003 (issued June 25, 2004) on September 22, 2004. The stack test demonstrated compliance with the permit conditions. The repeat compliance stack test shall be performed once every five years to determine compliance with the PM, PM10 and NOx emission limits at the 120" line pickling.

The Permittee performed a PM emission test for 120" line shotblaster after control, as required in SSM 065-18458-00003 (issued June 25, 2004) on September 22, 2004. The stack test demonstrated compliance with the permit conditions. The repeat compliance stack test shall be performed once every five years to determine compliance with the PM and PM10 emission factors at the 120" line shotblaster.

Following is the summary of stack test results conducted on September 22, 2004.

Process	Pollutant	Run #1 Emissions (lbs/ton)	Run #2 Emissions (lbs/ton)	Run #3 Emissions (lbs/ton)	Average Emissions (lbs/ton)	Emission Limit (lbs/ton)
120" line pickling	PM	0.01	0.01	0.01	0.01	0.25
120" line pickling	NOx	0.33	0.20	0.28	0.27	3.0
120" line shotblaster	PM	0.06	0.05	0.04	0.04	0.10

The Permittee shall conduct PM and PM10 stack test for Wheelabrator and Pangborn shotblasters within one hundred and eighty (180) days of issuance of this permit. Since the control device (baghouses) have not been tested, and their proper operation is required for the source to comply with 326 IAC 2-2 (PSD Minor Limit), the source shall be required to conduct testing.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (1) The 120 " line shotblast, Pangborn shot blaster, and Wheelbrator shot blaster have applicable compliance monitoring conditions as specified below:
 - (a) The Permittee shall record the pressure drop across each of the baghouses used in conjunction with the Wheelabrator shot blasting process, 120" line shot blaster, and Pangborn shot blaster, at least once per day when the process is in operation. When for any one reading, the pressure drop across any baghouse is outside the normal range of 2.0 and 6.0 inches of water 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, and shall be calibrated at least once every six (6) months.

(b) Broken or Failed Bag Detection:

(A) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(B) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

These monitoring conditions are necessary because the dust collectors must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-7 (Part 70), 326 IAC 6-3-2, and 40 CFR 64 (Compliance Assurance Monitoring) requirements.

(2) The 120 " line pickling has applicable compliance monitoring conditions as specified below:

- (a) Visible emission notations of the stack exhaust (E) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the 120" line pickling must operate properly to ensure compliance with 326 IAC 2-2 (PSD Minor Limit), 326 IAC 6-3-2, and 326 IAC 2-7 (Part 70) requirements.

Conclusion

The operation of this stationary source manufacturing rolled steel plates shall be subject to the conditions of this Part 70 permit T065-17992-00003.

Appendix A: Emissions Calculations

Entire Source Emissions

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Uncontrolled Emissions

Process / Emission Unit	PM	PM-10	SO ₂	NO _x	VOC	CO	Single	HAPS
	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	HAP (tons/yr)	(tons / yr)
Batch Pickling (based on mass balance)	7.49	7.49	0.00	17.98	0.00	0.00	4.64	7.49
Finish Hot Rolling	0.00	0.00	0.00	0.00	0.92	0.00	0.00	0.00
Slab Hot Rolling	0.00	0.00	0.00	0.00	1.60	0.00	0.00	0.00
Shot Blasting (wheel.)	612.00	61.20	0.00	0.00	0.00	0.00	0.00	0.00
120" shot blasting	2234.00	223.00	0.00	0.00	0.00	0.00	0.00	0.00
120" pickling	32.85	262.80	0.00	394.20	0.00	0.00	131.40	131.40
120" Annealing Fur.	0.33	1.32	0.10	17.34	0.95	14.57	negligible	negligible
Finish Mill Fur.	0.17	0.70	0.06	9.20	0.51	7.73	negligible	negligible
Slab Mill Fur 1.	0.36	1.44	0.11	18.97	1.04	15.93	negligible	negligible
Slab Mill Fur 2.	0.43	1.72	0.14	22.59	1.24	18.98	negligible	negligible
Heppenstall Furnace	0.09	0.36	0.03	4.73	0.26	3.97	negligible	negligible
Two (2) Salem Fur.	0.53	2.13	0.17	28.03	1.54	23.55	negligible	negligible
120" line boiler	0.08	0.33	0.03	4.40	0.24	3.69	negligible	negligible
Batch Pickling Boiler	0.04	0.18	0.01	2.33	0.13	1.96	negligible	negligible
Total	2888.38	562.67	0.65	519.77	8.44	90.38	136.04	138.89

Appendix A: Emissions Calculations

Entire Source Emissions

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Allowable and Limited Emissions

Process / Emission Unit	PM	PM-10	SO ₂	NO _x	VOC	CO	Single	HAPS
	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	HAP (tons/yr)	(tons / yr)
Batch Pickling (based on mass balance)	7.49	7.49	0.00	17.98	0.00	0.00	4.64	7.49
Finish Hot Rolling	0.00	0.00	0.00	0.00	0.92	0.00	0.00	0.00
Slab Hot Rolling	0.00	0.00	0.00	0.00	1.60	0.00	0.00	0.00
Shot Blasting (wheel.) **	181.42	181.42	0.00	0.00	0.00	0.00	0.00	0.00
120" shot blasting **	95.85	95.85	0.00	0.00	0.00	0.00	0.00	0.00
120" pickling **	151.50	151.50	0.00	227.26	0.00	0.00	75.75	75.75
120" Annealing Fur.	0.33	1.32	0.10	17.34	0.95	14.57	negligible	negligible
Finish Mill Fur.	0.17	0.70	0.06	9.20	0.51	7.73	negligible	negligible
Slab Mill Fur 1.	0.36	1.44	0.11	18.97	1.04	15.93	negligible	negligible
Slab Mill Fur 2.	0.43	1.72	0.14	22.59	1.24	18.98	negligible	negligible
Heppenstall Furnace	0.09	0.36	0.03	4.73	0.26	3.97	negligible	negligible
Two (2) Salem Fur.	0.53	2.13	0.17	28.03	1.54	23.55	negligible	negligible
120" line boiler	0.08	0.33	0.03	4.40	0.24	3.69	negligible	negligible
Batch Pickling Boiler	0.04	0.18	0.01	2.33	0.13	1.96	negligible	negligible
Total	492.03	444.44	0.65	352.83	8.43	90.38	80.39	83.24

** Reflects the limited emissions

Note: Torch Cutting, Shot Blasting operations use baghouse as control device.

The overall control efficiency of torch cutting is 89 %

The overall control efficiency of shot blasting operations is 96 %

Appendix A: Emissions Calculations

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Batch Pickling

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Process Data

Estimation Method: Material Balance
Maximum Process throughput: 15 tons/hr
Emission factors source: N/A
Control equipment: None
Capture efficiency: N/A
Control efficiency: N/A
Temperature of Acid Bath: 135 F
Temperature of Cold Rinse Tank: 120 F
Temperature of Hot Rinse Tank: 180 F
Average number of Plates pickled per eight (8) hour shift: 18
Average width of Plate pickled: 98 inches
Average length of plat pickled: 248 inches
Density of stainless tell: 495 lbs/ cubic feet
Repickle rate: 20 %
Volume of once Acid Bath Tank: 38,104 liters
Surface Area of Acid Bath Tank: 146.2 Sq.feet
Width of Acid Bath Tank: 56 inches
Length of Acid Bath Tank: 376 inches
Pickling room exhaust: 18,000 cubic feet per minute
Average quantity of HF purchased per year: 164,850
Average quantity of HNO₃ purchased per year: 444,312
Average quantity of HF disposed per year: 54,950
Average quantity of HNO₃ disposed per year: 344,963

Appendix A: Emissions Calculations

Batch Pickling (Continued)

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Methodology to estimate Potential Emissions due to evaporation:

Acid Baths

Based on Esco Engineering estimation techniques (US EPA utilized this technique for developing HCL MACT), the quantities of HF and HNO₃ emitted from one acid bath are 0.25 and 0.07 pounds per hour, respectively.

Potential emissions from 3 Acid Baths due to evaporation of HF

(quantity of HF emitted)(Maximum hours of Operation)(1ton/2,000 lbs)(Number of Baths) **3.285 tons/yr**

Potential emissions from 3 Acid Baths due to evaporation of HNO₃

(quantity of HNO₃ emitted)(Maximum hours of Operation)(1ton/2,000 lbs)(Number of Baths) **0.9198 tons/yr**

Cold Rinse Tanks

Based on Esco Engineering estimation techniques (US EPA utilized this technique for developing HCL MACT), the quantities of HF and HNO₃ emitted from one acid bath are 0.04 and 0.01 pounds per hour, respectively.

Potential emissions from cold rinse tank due to evaporation of HF

(quantity of HF emitted)(Maximum hours of Operation)(1ton/2,000 lbs)(Number of Baths) **0.1752 tons/yr**

Potential emissions from cold rinse tank due to evaporation of HNO₃

(quantity of HNO₃ emitted)(Maximum hours of Operation)(1ton/2,000 lbs)(Number of Baths) **0.0438 tons/yr**

Hot Rinse Tanks

Based on Esco Engineering estimation techniques (US EPA utilized this technique for developing HCL MACT), the quantities of HF and HNO₃ emitted from one acid bath are 0.27 and 0.43 pounds per hour, respectively.

Potential emissions from hot rinse tank due to evaporation of HF

(quantity of HF emitted)(Maximum hours of Operation)(1ton/2,000 lbs)(Number of Baths) **1.1826 tons/yr**

Potential emissions from hot rinse tank due to evaporation of HNO₃

(quantity of HNO₃ emitted)(Maximum hours of Operation)(1ton/2,000 lbs)(Number of Baths) **1.8834 tons/yr**

Total HF Emissions: 4.6428 tons/yr

Total HNO₃ Emissions: 2.847 tons/yr

Total PM/PM₁₀ Emissions *: 7.49

* Particulate emissions are from the acid mist, therefore, the total acid emissions are equal to PM/PM₁₀ emissions. NO dust is generated from this operation.

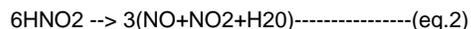
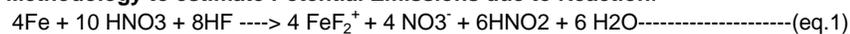
Appendix A: Emissions Calculations

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Batch Pickling (Continued)

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Methodology to estimate Potential Emissions due to Reaction:



These equations are verified by Mr. Mark Ingle with Metal Finishing Effluent Guidelines Program US EPA

HNO₃ Consumed = HNO₃ Purchased - HNO₃ Disposed
HNO₃ Consumed **49.6745** tons/ yr

Based on Equation 1:

10 Moles of HNO₃ produces 6 moles of HNO₂
i.e. 630 tons of HNO₃ produces 282 tons HNO₂
So, 49.6745 tons of HNO₃ produces **22.23525** tons/yr of HNO₂

Based on Equation 2:

6 moles of HNO₂ produces 3 moles of NO +3 moles of NO₂
i.e. 282 tons of HNO₂ produces 90 tons of NO + 138 tons of NO₂
So, 22.235 tons/yr of HNO₂ produces **7.096277** tons / yr of NO
 10.88096 tons / yr of NO₂

Total NO_x emissions from Batch pickling process are: **17.97723** tons / yr

Appendix A: Emissions Calculations

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Finish Mill Hot Rolling

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Process Data:

Estimation Method: Engineering Calculations
Source Classification Code: 3-03-009-31
Maximum Process throughput: 2.625 tons/yr
Emission factors source: AIRS
Pollutant generated by process: VOC
Emission factors: VOCs= 0.08 lbs/ton
Control equipment: None
Capture efficiency: N/A
Control efficiency: N/A

Methodology to estimate potential emissions:

VOC emissions= (Maximum process throughput)(Emissions Factor)(1 ton/2,000 lbs)

VOC Emissions: **0.92 tons/yr**

Appendix A: Emissions Calculations

Page 7 of 25 ATSD App. A

Slab Mill Hot Rolling

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Process Data:

Estimation Method: Engineering Calculations
Source Classification Code: 3-03-009-31
Maximum Process throughput: 4.566 tons/hr
Emission factors source: AIRS
Pollutant generated by process: VOC
Emission factors: VOCs= 0.08 lbs/ton
Control Equipment: None
Capture efficiency: N/A
Control Efficiency: N/A

Methodology to estimate potential emissions:

VOC emissions= (Maximum process throughput)(Emissions Factor)(1 ton/2,000 lbs)

VOC Emissions: **1.6 tons/yr**

Appendix A: Emissions Calculations

Shot Blasting (Wheelabrator)

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Maximum throughput Capacity = 36 tons/hr
PM Emission Factor = 17 lb/ton (from FIRE version 6.25)
PM10 Emission Factor = 1.7 lb/ton (from FIRE version 6.25)

Uncontrolled PM Emissions = Steel shot flow rate x Emission factor
= 612.00 ton/yr

Uncontrolled PM10 Emissions = Steel shot flow rate x emission factor PM x Fraction of PM10
= 61.20 ton/yr

The baghouse control efficiency is 97% provided by the source.

Potential controlled PM emissions = Uncontrolled PM emissions x (1-baghouse efficiency)
= 18.36

Potential controlled PM10 emissions = Uncontrolled PM10 emissions x (1-baghouse efficiency)
= 1.84

**Appendix A: Emission Calculations
120" Line Pickling and Shot Blast Operations**

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Following Potential Emissions for the 120" line shotblaster are based on CP 065-5836-00003, issued on August 1, 1996

Emission Unit	Maximum Capacity	Emission Factor	Emission Factor (lb/ton)	Source of Emission Factor	Control Efficiency %	Capture Efficiency %	Potential Emissions After Controls						
							PM (Tons/Year)	PM10 (Tons/Year)	SOx (Tons/Year)	NOx (Tons/Year)	VOC (Tons/Year)	CO (Tons/Year)	HF (Tons/Year)
Potential Uncontrolled Emissions													
120" Line Shot Blast	30.00 (ton/hr)	PM PM10	17.00 1.70 Note 1	FIRE FIRE	0.00% 0.00%	- -	2,234	223	0.00	0.00	0.00	0.00	0.00
Emission Factor = lb/ton													
Potential Controlled Emissions													
120" Line Shot Blast	30.00 (ton/hr)	PM PM10	0.10 0.10 Note 1	2003 Stack Test 2003 Stack Test	Already Accounted For Already Accounted For		13.14	13.14	0.00	0.00	0.00	0.00	0.00
Emission Factor = lb/ton													
Potential Uncontrolled Emissions													
120" Pickling Line	30.00 (ton/hr)	PM PM10 NOx HF	0.25 2.00 3.00 1.00 Note 2	2003 Stack Test 2003 Stack Test 2003 Stack Test 2003 Stack Test	0 0 0 0	0 0 0 0	32.85	262.80	0.00	394.20	0.00	0.00	131.40
Total Potential Emissions BEFORE Controls (tons/year)							32.85	262.80	0.00	394.20	0.00	0.00	131.40
Potential Controlled Emissions													
120" Pickling Line	151,500.00 (tons/year)	PM * PM10 * NOx HF	0.967 2.00 3.00 1.00 Note 2	Allowable 2003 Stack Test 2003 Stack Test 2003 Stack Test	0 0 0 0	0 0 0 0	73.26	151.50	0.00	227.25	0.00	0.00	75.75
Total Potential Emissions AFTER Controls (tons/year)							73.26	151.50	0.00	227.25	0.00	0.00	75.75

Note 1: The stack test conducted on September 22, 2004 for the 120" line shotblaster with a control device (baghouse) on resulted in PM emission rate of 0.047 lb/ton. However, Outokumpu has requested that the PM/PM10 emission factor of 0.1 lb/ton shall be used to add a safety factor to the tested emission factor.

Note 1: The stack test conducted on September 22, 2004 for the 120" line pickling without a control device (wet scrubber) on resulted in PM and NOx emission rate of 0.01 and 0.27 lb/ton, respectively. However, Outokumpu has requested that the PM, PM10, and NOx emission factors of 0.25, 2.0 and 3.0 lb/ton, respectively, shall be used to add a safety factor to the tested emission factor.

* Allowable emission limits

Appendix A: Emissions Calculations
One(1) finish mill walking beam furnace
Potential Emissions from Natural Gas Combustion
MM BTU/HR <100

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr

21.0 184.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.17	0.70	0.06	9.20	0.51	7.73

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology to estimate potential emissions:

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations

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

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.932E-04	1.104E-04	6.899E-03	1.656E-01	3.127E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.599E-05	1.012E-04	1.288E-04	3.495E-05	1.932E-04

Methodology is the same as previous page.

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

Appendix A: Emissions Calculations

One (1) Slab Mill reheat furnace-1

Potential Emissions from Natural Gas Combustion

MM BTU/HR <100

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr

43.3

379.3

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.36	1.44	0.11	18.97	1.04	15.93

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

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

Methodology to estimate potential emissions:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.983E-04	2.276E-04	1.422E-02	3.414E-01	6.448E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	9.483E-05	2.086E-04	2.655E-04	7.207E-05	3.983E-04

Methodology is the same as previous page.

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

Appendix A: Emissions Calculations

One (1) Slab Mill reheat furnace-2

**Potential Emissions from Natural Gas Combustion
MM BTU/HR <100**

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr

51.6 451.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.43	1.72	0.14	22.59	1.24	18.98

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology to estimate potential emissions:

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 See next page for HAPs emissions calculations.

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

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.744E-04	2.711E-04	1.694E-02	4.067E-01	7.681E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.130E-04	2.485E-04	3.163E-04	8.585E-05	4.744E-04

Methodology is the same as previous page.

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

Appendix A: Emissions Calculations
One (1) Heppenstall annealing furnace
Potential Emissions from Natural Gas Combustion
MM BTU/HR <100

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr

10.8 94.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.09	0.36	0.03	4.73	0.26	3.97

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology to estimate potential emissions:

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations

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

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.934E-05	5.676E-05	3.548E-03	8.515E-02	1.608E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.365E-05	5.203E-05	6.623E-05	1.798E-05	9.934E-05

Methodology is the same as previous page.

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

Appendix A: Emissions Calculations
Two (2) Salem Annealing Furnace
Potential Emissions from Natural Gas Combustion
MM BTU/HR <100

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr

64.0 560.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.53	2.13	0.17	28.03	1.54	23.55

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology to estimate potential emissions:

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations

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

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.887E-04	3.364E-04	2.102E-02	5.046E-01	9.531E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.402E-04	3.084E-04	3.924E-04	1.065E-04	5.887E-04

Methodology is the same as previous page.

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

Appendix A: Emissions Calculations

120" Line Boiler

Potential Emissions from Natural Gas Combustion MM BTU/HR <100

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr

10.0

88.0

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.08	0.33	0.03	4.40	0.24	3.69

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

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

Methodology to estimate potential emissions:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

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

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.235E-05	5.277E-05	3.298E-03	7.916E-02	1.495E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.199E-05	4.837E-05	6.157E-05	1.671E-05	9.235E-05

Methodology is the same as previous page.

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

Appendix A: Emissions Calculations

Batch Natural Gas Boiler

Potential Emissions from Natural Gas Combustion

MM BTU/HR <100

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr

5.3

46.7

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.04	0.18	0.01	2.33	0.13	1.96

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

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

Methodology to estimate potential emissions:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.903E-05	2.801E-05	1.751E-03	4.202E-02	7.937E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.167E-05	2.568E-05	3.268E-05	8.871E-06	4.903E-05

Methodology is the same as previous page.

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

Appendix A: Emissions Calculations
One (1) 120" line annealing furnace
Potential Emissions from Natural Gas Combustion
MM BTU/HR <100

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr

39.6 346.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.33	1.32	0.10	17.34	0.95	14.57

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology to estimate potential emissions:

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations

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

Company Name: Outokumpu Stainless, Inc., Plate Products
Address City IN Zip: 549 West State Road 38 New Castle, IN 47632
Part 70 Permit: T065-17992-00003
Reviewer: AY/EVP
Date: 6/16/2006

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.642E-04	2.081E-04	1.301E-02	3.122E-01	5.897E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.672E-05	1.908E-04	2.428E-04	6.591E-05	3.642E-04

Methodology is the same as previous page.

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