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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: January 28, 2008

RE: Allegheny Ludlum Corporation / 065-18222-00014

FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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 impractible 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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Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Allegheny Ludlum Corporation
State Route 38 West
New Castle, Indiana 47362

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

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

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

Operation Permit No.: T 065-18222-00014	
Issued by/Original Signed By: Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 28, 2008 Expiration Date: January 28, 2013

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary metal treating and cold rolled steel sheet manufacturing source.

Source Address:	State Route 38 West, New Castle, Indiana 47362
Mailing Address:	100 River Road, Brackenridge, Pennsylvania 15014
General Source Phone Number:	724 - 226 - 5947
SIC Code:	3398
County Location:	Henry
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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) No. 11 A&P Annealing Furnace, identified as S001A, modified in 1998, fired by natural gas and exhausting to fugitive emission point P001, maximum capacity: 27 tons of steel per hour, and maximum heat input capacity: 60 million British thermal units per hour.

(b) One (1) No. 12 A&P Annealing Furnace, identified as S002A, constructed in 1967, fired by natural gas and exhausting to fugitive emission point P005, using low NOx burners with flue gas recirculation with a heat input capacity of 29.0 million British thermal units per hour, maximum capacity: 27 tons of steel per hour, and total maximum heat input capacity: 69.0 million British thermal units per hour.

(c) One (1) No. 11 A&P Line Jet Cooler Unit, identified as S001B, constructed in 1981, using a baghouse, identified as D001 as control, and exhausting to Stack P002, maximum capacity: 27 tons of steel per hour.

(d) One (1) No. 11 A&P Line Shot Blast Unit, identified as S001C, constructed in 1967 and replaced in 1995, using a baghouse identified as D002 as control, and exhausting to Stack P003, maximum capacity: 27 tons of steel per hour.

(e) One (1) No. 11 A&P Acid Pickling Facility, identified as S001D, constructed in 1967, using a chemical scrubber, identified as D003 as control, and exhausting to Stack P004, maximum capacity: 27 tons of steel per hour.

(f) One (1) No. 12 A&P Kolene Rinse, identified as S002C, constructed in 1967 and replaced in 1996, using a chemical scrubber, identified as D003 as control, and exhausting to Stack P004, maximum capacity: 27 tons of steel per hour.

(g) One (1) No. 12 A&P Line Acid Pickling Facility, identified as S002D, constructed in 1967, using a chemical scrubber, identified as D003 as control, and exhausting to Stack P004, maximum capacity: 27 tons of steel per hour.

(h) One (1) North Boiler, identified as S006, installed in 1966, fired by natural gas and exhausting to Stack P011, maximum heat input capacity: 20.92 million British thermal units per hour.

(i) One (1) Middle Boiler, identified as S007, installed in 2006, fired by natural gas and exhausting to Stack P012, maximum heat input capacity: 14.61 million British thermal units per hour.

(j) One (1) South Boiler, identified as S008, installed in 1966, fired by natural gas and exhausting to Stack P013, maximum heat input capacity: 10.46 million British thermal units per hour.

(k) One (1) Strip Grinder/Polisher, identified as S003A, composed of four (4) grinding heads and four (4) eliminators, constructed in 1967, using oil mist eliminators, identified as D004, D005, D006 and D008 as control, and exhausting to Stack P007, maximum capacity: 25 tons of steel per hour.

(l) One (1) Z-Mill, identified as S004, constructed in 1967, using an oil mist eliminator, identified as D007 as control, and exhausting to Stack P009, maximum capacity: 35 tons of steel per hour.

(m) One (1) Temper Mill, identified as S005, constructed in 1967, and exhausting to fugitive emission point P010, maximum capacity: 50 tons of steel per hour.

(n) Three (3) Parts Cleaners, identified as S009A, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P014, maximum throughput: 0.5 gallons of mineral spirits per hour, each.

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) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(b) 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]

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T 065-18222-00014, 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 the "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) The "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) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) 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 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.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of permits established prior to T 065-18222-00014 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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance 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] [40 CFR 72]

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

(b) 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] [326 IAC 2-3-2]

(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 and/or 326 IAC 2-3-2.

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 one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed five hundred fifty-one thousandths (0.551) pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 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 two hundred sixty (260) linear feet on pipes or one hundred sixty (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 seventy-five hundredths (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 an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.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 13, 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 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 61-50 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) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit other than a project at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with the 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 record keeping 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)]: Furnaces, Cooler, Shot Blast, Acid Pickling & Kolene Rinse

(a) One (1) No. 11 A&P Annealing Furnace, identified as S001A, modified in 1998, fired by natural gas and exhausting to fugitive emission point P001, maximum capacity: 27 tons of steel per hour, and maximum heat input capacity: 60 million British thermal units per hour.

(b) One (1) No. 12 A&P Annealing Furnace, identified as S002A, constructed in 1967, fired by natural gas and exhausting to fugitive emission point P005, using low NO_X burners with flue gas recirculation with a heat input capacity of 29.0 million British thermal units per hour, maximum capacity: 27 tons of steel per hour, and total maximum heat input capacity: 69.0 million British thermal units per hour.

(c) One (1) No. 11 A&P Line Jet Cooler Unit, identified as S001B, constructed in 1981, using a baghouse, identified as D001 as control, and exhausting to Stack P002, maximum capacity: 27 tons of steel per hour.

(d) One (1) No. 11 A&P Line Shot Blast Unit, identified as S001C, constructed in 1967 and replaced in 1995, using a baghouse identified as D002 as control, and exhausting to Stack P003, maximum capacity: 27 tons of steel per hour.

(e) One (1) No. 11 A&P Acid Pickling Facility, identified as S001D, constructed in 1967, using a chemical scrubber, identified as D003 as control, and exhausting to Stack P004, maximum capacity: 27 tons of steel per hour.

(f) One (1) No. 12 A&P Kolene Rinse, identified as S002C, constructed in 1967 and replaced in 1996, using a chemical scrubber, identified as D003 as control, and exhausting to Stack P004, maximum capacity: 27 tons of steel per hour.

(g) One (1) No. 12 A&P Line Acid Pickling Facility, identified as S002D, constructed in 1967, using a chemical scrubber, identified as D003 as control, and exhausting to Stack P004, maximum capacity: 27 tons of steel per hour.

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

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the following emission units and control devices shall not exceed the pounds per hour limitation when operating at the stated process weight rates calculated using 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

Unit ID / Control Device or Stack ID	Total Process Weight (tons per hour)	Allowable PM Rate (pounds per hour)
S001A / P001	27.0	37.3
S002A / P005	27.0	37.3
S001B / D001	27.0	37.3
S001C / D002	27.0	37.3
S001D / D003	27.0	37.3
S002C / D003	27.0	37.3
S002D / D003	27.0	37.3

D.1.2 Hazardous Air Pollutants (HAPs)

(a) Pursuant to SPM 065-22611-00014, issued on October 26, 2006, the single HAP emissions shall not exceed the rates as indicated in the following table:

Unit ID	HAP	Hourly HAP Emission Rate (pounds per hour)
S001B	Chromium Compounds	0.02
	Manganese Compounds	0.07
	Nickel Compounds	0.19
S001C	Chromium Compounds	0.30
	Manganese Compounds	0.20
	Nickel Compounds	1.10
S001D	Hydrogen Fluoride (Hydrofluoric Acid (HF))	0.60
S002C	Chromium Compounds	0.17
S002D	Hydrogen Fluoride (Hydrofluoric Acid (HF))	0.60

(b) Compliance with the above limits combined with HAPs emissions from other emission units shall limit the source-wide single HAP and combined HAPs to less than ten (10) and twenty-five (25) tons per year and will make the source an area source for HAPs.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) No. 12 A&P Line Acid Pickling Facility, identified as S002D, one (1) No. 12 A&P Kolene Rinse, identified as S002C, the one (1) No. 11 A&P Acid Pickling Facility, identified as S001D, the one (1) No. 11 A&P Line Shot Blast Unit, identified as S001C, and the one (1) No. 11 A&P Line Jet Cooler Unit, identified as S001B, and their control devices.

Compliance Determination Requirements

D.1.4 Particulate Control [326 IAC 2-7-6(6)]

(a) In order to comply with Conditions D.1.1 and D.1.2, the baghouses and wet chemical scrubbers for particulate control shall be in operation and control emissions from the No. 12 A&P Kolene Rinse, identified as S002C, the No. 11 A&P Line Shot Blast Unit, identified as

S001C, and the No. 11 A&P Line Jet Cooler Unit, identified as S001B, at all times that these facilities 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.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred eighty (180) days of issuance of this Part 70 Operating Permit Renewal, T - 065-18222-00014, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing of the No. 11 A&P Line Shot Blast Unit, identified as S001C, exhausting to Stack P003 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Assurance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]

D.1.6 Visible Emissions Notations [40 CFR 64, Compliance Assurance Monitoring (CAM)]

(a) Visible emission notations of the No. 11 A&P Line Jet Cooler, No. 11 A&P Line Shot Blast Unit, No. 11 A&P Line Acid Pickling Facility, No. 12 A&P Line Acid Pickling Facility, and No. 12 A&P Line Kolene Rinse stack exhausts 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.1.7 Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1) [40 CFR 64, Compliance Assurance Monitoring (CAM)]

(a) The Permittee shall record the pressure drop across the baghouses D001 and D002 used in conjunction with the No. 11 A&P Line Jet Cooler and the No. 11 A&P Line Shot Blast Unit at least once per day when the No. 11 A&P Line Jet Cooler and the No. 11 A&P Line Shot Blast Unit are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 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.

(b) The Permittee shall record the pressure drop across, the scrubbing liquid (water) flow rate of, and recirculation pH readings of the wet chemical scrubber controlling the No. 11 A&P Line Acid Pickling Facility, No. 12 A&P Line Acid Pickling Facility, and the No. 12 A&P Line Kolene Rinse (S001D, S002D, and S002C), at least once per day when any of the facilities are in operation. When for any one reading, the pressure drop across the wet chemical scrubber (D003) is outside the normal range of 2.0 and 10.0 inches of water, the flow rate for scrubbing liquid is less than 200 gallons of water per minute or the recirculation water pH is below 9.0 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, or a flow rate or pH below the indicated values are 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.

(c) The instrument used for determining the pressure, flow rate, and pH 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.1.8 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 line or 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.

D.1.9 Wet Scrubber Failure Detection

(a) For a wet scrubber 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 wet scrubber 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 line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.6, the Permittee shall maintain a daily record of visible emission notations of the No. 11 A&P Line Jet Cooler, No. 11 A&P Line Shot Blast Unit, No. 11 A&P Line Acid Pickling Facility, No. 12 A&P Line Acid Pickling Facility, and No. 12 A&P Line Kolene Rinse 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 No. 11 A&P Line Jet Cooler, No. 11 A&P Line Shot Blast Unit, No. 11 A&P Line Acid Pickling Facility, No. 12 A&P Line Shot Blast Unit, No. 11 A&P Line Acid Pickling Facility, and No. 12 A&P Line Kolene Rinse did not operate that day).

(b) To document compliance with Condition D.1.7(a), the Permittee shall maintain a daily record of the pressure drop across the baghouses controlling the No. 11 A&P Line Jet Cooler and the No. 11 A&P Line Shot Blast Unit. (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 No. 11 A&P Line Jet Cooler and the No. 11 A&P Line Shot Blast Unit did not operate that day).

(c) To document compliance with Condition D.1.7(b), the Permittee shall maintain a daily record of the scrubbing liquid flow rate, recirculation pH and the pressure drop across the scrubber controlling the No. 11 A&P Line Acid Pickling Facility, No. 12 A&P Line Acid Pickling Facility, and the No. 12 A&P Line Kolene Rinse. (The Permittee shall include in its daily record when a flow rate, pH and/or pressure drop reading is not taken and the reason for the lack of a flow rate, pH and/or pressure drop (e.g., No. 11 A&P Line Acid Pickling Facility, No. 12 A&P Line Acid Pickling Facility, and the No. 12 A&P Line Kolene Rinse did not operate that day).

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

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Natural Gas-Fired Boilers

(h) One (1) North Boiler, identified as S006, installed in 1966, fired by natural gas and exhausting to Stack P011, maximum heat input capacity: 20.92 million British thermal units per hour.

(i) One (1) Middle Boiler, identified as S007, installed in 2006, fired by natural gas and exhausting to Stack P012, maximum heat input capacity: 14.61 million British thermal units per hour.

(j) One (1) South Boiler, identified as S008, installed in 1966, fired by natural gas and exhausting to Stack P013, maximum heat input capacity: 10.46 million British thermal units per hour.

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

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

D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3] [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 20.92 and 10.47 million British thermal units per hour heat input North Boiler and South Boiler installed in 1966 shall be limited to 0.708 pounds per million British thermal units heat input. This limitation is based on the following equation:

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

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic feet per minute meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 million British thermal units per hour heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height will be computed using a weighted average of stack heights.

Pt = $(50\ \mu g/m^3 \times 0.67 \times 35\ ft) / (76.5 \times 41.84^{0.75} \times 3^{0.25}) = 0.708$ lbs PM / MMBtu

(b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from Middle Boiler shall not exceed 0.403 pounds per million Btu heat input. This limitation was calculated using the following equation:

$Pt = 1.09/Q^{0.26}$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input, which is 45.99 million British thermal units per hour, including the proposed Middle Boiler and the two (2) existing boilers (North and South Boilers, rated at 20.92 and 10.46 million British thermal units per hour, respectively) at this source. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

New Source Performance Standards (NSPS) Requirements

D.2.2 General Provisions Relating to NSPS, Subpart Dc [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1-1 for the Middle Boiler, identified as S007.

(b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports 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

D.2.3 NSPS, Subpart Dc, Requirements [40 CFR Part 60, Subpart Dc]

Pursuant to CFR Part 60, Subpart Dc, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart Dc as specified as follows:

§ 60.40c Applicability and delegation of authority.

(a) Except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).

(b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

(c) Steam generating units that meet the applicability requirements in paragraph (a) of this section are not subject to the sulfur dioxide (SO_2) or particulate matter (PM) emission limits, performance testing requirements, or monitoring requirements under this subpart (§§60.42c, 60.43c, 60.44c, 60.45c, 60.46c, or 60.47c) during periods of combustion research, as defined in §60.41c.

(d) Any temporary change to an existing steam generating unit for the purpose of conducting combustion research is not considered a modification under §60.14.

(e) Heat recovery steam generators that are associated with combined cycle gas turbines and meet the applicability requirements of subpart GG or KKKK of this part are not subject to this subpart. This subpart will continue to apply to all other heat recovery steam generators that are capable of combusting more than or equal to 2.9 MW (10 MMBtu/hr) heat input of fossil fuel but less than or equal to 29 MW (100 MMBtu/hr) heat input of fossil fuel. If the heat recovery

steam generator is subject to this subpart, only emissions resulting from combustion of fuels in the steam generating unit are subject to this subpart. (The gas turbine emissions are subject to subpart GG or KKKK, as applicable, of this part).

(f) Any facility covered by subpart AAAA of this part is not covered by this subpart.

(g) Any facility covered by an EPA approved State or Federal section 111(d)/129 plan implementing subpart BBBB of this part is not covered by this subpart.

§ 60.41c Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

Annual capacity factor means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility during a period of 12 consecutive calendar months.

Coal means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society of Testing and Materials in ASTM D388 (incorporated by reference, see §60.17), coal refuse, and petroleum coke. Coal-derived synthetic fuels derived from coal for the purposes of creating useful heat, including but not limited to solvent refined coal, gasified coal, coal-oil mixtures, and coal-water mixtures, are also included in this definition for the purposes of this subpart.

Coal refuse means any by-product of coal mining or coal cleaning operations with an ash content greater than 50 percent (by weight) and a heating value less than 13,900 kilojoules per kilogram (kJ/kg) (6,000 Btu per pound (Btu/lb) on a dry basis.

Cogeneration steam generating unit means a steam generating unit that simultaneously produces both electrical (or mechanical) and thermal energy from the same primary energy source.

Combined cycle system means a system in which a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

Combustion research means the experimental firing of any fuel or combination of fuels in a steam generating unit for the purpose of conducting research and development of more efficient combustion or more effective prevention or control of air pollutant emissions from combustion, provided that, during these periods of research and development, the heat generated is not used for any purpose other than preheating combustion air for use by that steam generating unit (*i.e.* , the heat generated is released to the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

Conventional technology means wet flue gas desulfurization technology, dry flue gas desulfurization technology, atmospheric fluidized bed combustion technology, and oil hydrodesulfurization technology.

Distillate oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396 (incorporated by reference, see §60.17).

Dry flue gas desulfurization technology means a SO_2control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline reagent and water, whether introduced separately or as a premixed slurry or solution and forming a dry powder material. This definition includes devices where the dry powder material is subsequently converted to another form. Alkaline reagents used in dry flue gas desulfurization systems include, but are not limited to, lime and sodium compounds.

Duct burner means a device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

Emerging technology means any SO_2control system that is not defined as a conventional technology under this section, and for which the owner or operator of the affected facility has received approval from the Administrator to operate as an emerging technology under §60.48c(a)(4).

Federally enforceable means all limitations and conditions that are enforceable by the Administrator, including the requirements of 40 CFR parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 51.24.

Fluidized bed combustion technology means a device wherein fuel is distributed onto a bed (or series of beds) of limestone aggregate (or other sorbent materials) for combustion; and these materials are forced upward in the device by the flow of combustion air and the gaseous products of combustion. Fluidized bed combustion technology includes, but is not limited to, bubbling bed units and circulating bed units.

Fuel pretreatment means a process that removes a portion of the sulfur in a fuel before combustion of the fuel in a steam generating unit.

Heat input means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

Heat transfer medium means any material that is used to transfer heat from one point to another point.

Maximum design heat input capacity means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

Natural gas means: (1) A naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane; or (2) liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835 (incorporated by reference, see §60.17).

Noncontinental area means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, or the Northern Mariana Islands.

Oil means crude oil or petroleum, or a liquid fuel derived from crude oil or petroleum, including distillate oil and residual oil.

Potential sulfur dioxide emission rate means the theoretical SO_2emissions (nanograms per joule (ng/J) or lb/MMBtu heat input) that would result from combusting fuel in an uncleaned state and without using emission control systems.

Process heater means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.

Residual oil means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396 (incorporated by reference, see §60.17).

Steam generating unit means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

Steam generating unit operating day means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

Wet flue gas desulfurization technology means an SO_2control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a liquid material. This definition includes devices where the liquid material is subsequently converted to another form. Alkaline reagents used in wet flue gas desulfurization systems include, but are not limited to, lime, limestone, and sodium compounds.

Wet scrubber system means any emission control device that mixes an aqueous stream or slurry with the exhaust gases from a steam generating unit to control emissions of PM or SO_2.

Wood means wood, wood residue, bark, or any derivative fuel or residue thereof, in any form, including but not limited to sawdust, sanderdust, wood chips, scraps, slabs, millings, shavings, and processed pellets made from wood or other forest residues.

§ 60.48c Reporting and recordkeeping requirements.

(a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

(g)(1) Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

(2) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO_2standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

(3) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO_2standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

(i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

(j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Strip Grinder/Polisher, Z-Mill, & Temper Mill

(k) One (1) Strip Grinder/Polisher, identified as S003A, composed of four (4) grinding heads and four (4) eliminators, constructed in 1967, using oil mist eliminators, identified as D004, D005, D006 and D008 as control, and exhausting to Stack P007, maximum capacity: 25 tons of steel per hour.

(l) One (1) Z-Mill, identified as S004, constructed in 1967, using an oil mist eliminator, identified as D007 as control, and exhausting to Stack P009, maximum capacity: 35 tons of steel per hour.

(m) One (1) Temper Mill, identified as S005, constructed in 1967, and exhausting to fugitive emission point P010, maximum capacity: 50 tons of steel per hour.

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

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

D.3.1 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Strip Grinder/Polisher, identified as S003A, shall not exceed 35.4 pounds per hour when operating at a process weight rate of twenty-five (25) tons per hour.

The pounds per hour limitation was calculated using 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

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Z-Mill, identified as S004, shall not exceed 41.3 pounds per hour when operating at a process weight rate of thirty-five (35) tons per hour.

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:

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

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.3 Particulate Control [326 IAC 2-7-6(6)]

In order to comply with Condition D.3.1, the oil mist eliminators for particulate control shall be in operation and control emissions from the Strip Grinder/Polisher, identified as S003A and the Z-Mill, identified as S004, at all times that these facilities are in operation.

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

D.3.4 Mist Eliminator Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64, Compliance Assurance Monitoring (CAM)]

(a) The Permittee shall record the oil pressure for the Strip Grinder/Polisher (S003A) at least once per day when the Strip Grinder/Polisher is in operation. When for any one reading, the oil pressure for the Strip Grinder/Polisher is less than 10 PSI 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.

(b) The Permittee shall record the oil pressure for the Z-Mill (S004) at least once per day when the Z-Mill is in operation. When for any one reading, the oil pressure for the Z-Mill is less than 8 PSI 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.

(c) The instrument used for determining the oil 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.3.5 Failure Detection

In the event that failure of an oil mist eliminator has been observed:

(a) The affected oil mist eliminator will be shut down immediately until the failed units have been cleaned or replaced.

(b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Preventive Maintenance Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Preventive Maintenance Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

D.3.6 Visible Emissions Notations [40 CFR 64, Compliance Assurance Monitoring (CAM)]

(a) Visible emission notations of the Strip Grinder/Polisher stack exhaust (P007) and the Z-Mill stack exhaust (P009) 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.3.7 Record Keeping Requirements

(a) To document compliance with Condition D.3.4, the Permittee shall maintain records of the oil pressure for the Strip Grinder/Polisher (S003A) and the Z-Mill (S004) once per day. The Permittee shall include in its daily record when an oil pressure notation is not taken and the reason for the lack of an oil pressure notation (e.g., Strip Grinder/Polisher (S003A) or the Z-Mill (S004) did not operate that day).

(b) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the Strip Grinder/Polisher (S003A) stack (P007) exhaust and the Z-Mill (S004) stack (P010) exhaust once per day. 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., Strip Grinder/Polisher (S003A) or the Z-Mill (S004) 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.4 FACILITY OPERATION CONDITIONS

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

(n) Three (3) Parts Cleaners, identified as S009A, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P014, maximum throughput: 0.5 gallons of mineral spirits per hour, each.

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Organic Solvent Degreasing Operations), the owner or operator of the (3) Parts Cleaners, identified as S009A, and the one (1) Parts Cleaner, identified as S009B, 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 operating 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.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

SECTION D.5 FACILITY OPERATION CONDITIONS

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

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]

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

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

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the brazing equipment, cutting torches, soldering equipment, welding equipment shall not exceed the allowable PM emission rate based on 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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Allegheny Ludlum Corporation
Source Address: State Route 38 West, New Castle, Indiana 47362
Mailing Address: 100 River Road, Brakenridge, Pennsylvania 15014
Part 70 Permit No.: T 065-18222-00014

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 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Allegheny Ludlum Corporation
Source Address: State Route 38 West, New Castle, Indiana 47362
Mailing Address: 100 River Road, Brakenridge, Pennsylvania 15014
Part 70 Permit No.: T 065-18222-00014

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- 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); and
- C 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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Allegheny Ludlum Corporation
Source Address: State Route 38 West, New Castle, Indiana 47362
Mailing Address: 100 River Road, Brakenridge, Pennsylvania 15014
Part 70 Permit No.: T 065-18222-00014

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ 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

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

Source Name:	Allegheny Ludlum Corporation
Source Location:	State Route 38 West, New Castle, Indiana 47362
County:	Henry
SIC Code:	3398
Permit Renewal No.:	T065-18222-00014
Permit Reviewer:	Meredith W. Jones

On October 18, 2007, the Office of Air Quality (OAQ) had a notice published in the Courier Times in New Castle, Indiana, stating that Allegheny Ludlum Corporation had applied for a Part 70 Operating Permit renewal for a stationary metal treating and cold rolled steel sheet manufacturing source. 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 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.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. The Table of Contents has been modified to reflect these changes. No changes have been made to the TSD, however, because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice.

OAQ Change:

After further review, the OAQ has discovered that the one (1) Temper Mill, identified as S005, is included in the list of permitted emission units and control equipment in Condition A.2 as well as the TSD, but was not included in Section D of the draft permit.

The unit has been added to Section D.3 as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Strip Grinder/Polisher**,** ~~&~~ Z-Mill**, & Temper Mill**

(k) One (1) Strip Grinder/Polisher, identified as S003A, composed of four (4) grinding heads and four (4) eliminators, constructed in 1967, using oil mist eliminators, identified as D004, D005, D006 and D008 as control, and exhausting to Stack P007, maximum capacity: 25 tons of steel per hour.

(l) One (1) Z-Mill, identified as S004, constructed in 1967, using an oil mist eliminator, identified as D007 as control, and exhausting to Stack P009, maximum capacity: 35 tons of steel per hour.

(m) One (1) Temper Mill, identified as S005, constructed in 1967, and exhausting to fugitive emission point P010, maximum capacity: 50 tons of steel per hour.

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

Comments on the proposed Part 70 permit renewal were received on November 20, 2007 from Ms. Deborah Calderazzo, representing Allegheny Ludlum Corporation.

Comment #1

In Condition A.1 the name of the city in the mailing address is misspelled.

Response to Comment #1

The misspelling has been corrected as follows:

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

The Permittee owns and operates a stationary metal treating and cold rolled steel sheet manufacturing source.

Source Address:	State Route 38 West, New Castle, Indiana 47362
Mailing Address:	100 River Road, Bra**c**kenridge, Pennsylvania 15014
General Source Phone Number:	724 - 226 - 5947
SIC Code:	3398
County Location:	Henry
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

Comment #2

To allow greater flexibility in scheduling test dates when production will be at or near maximum capacity, we request 180 days to schedule the testing required in Condition D.1.5(a). Furthermore, because we believe that periodic testing on an emission unit to demonstrate compliance with a limit that is 28 times higher than the actual potential emission rate is an unnecessary and unreasonable requirement, we request that one time testing be used to demonstrate compliance with the emission limitation and daily exhaust observations be used to demonstrate ongoing compliance.

Response to Comment #2

The length of time after the issuance of the permit renewal within which the Permittee shall perform the testing required in Condition D.1.5(a) has been extended from ninety (90) to one hundred eighty (180) days.

The requirement to perform PM testing of the No. 11 A&P Line Shot Blast Unit, identified as S001C and exhausting to Stack P003, remains unchanged because as a major source of PM emissions before controls, testing of this unit is required at least once every five (5) years.

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~(a)~~ Within ~~ninety (90)~~ **one hundred eighty (180)** days of issuance of this Part 70 Operating Permit Renewal, T - 065-18222-00014, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing of the No. 11 A&P Line Shot Blast Unit, identified as S001C, exhausting to Stack P003 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Comment #3

Because the Second Significant Permit Modification No. 065-22611-00014, issued on October 26, 2006, specified that the intent of the testing required in Condition D.1.5(b) was a one-time demonstration of compliance and because the testing conducted on April 17 and 19, 2007 demonstrated that HAP metals emissions are significantly lower than the emission limits, we request that the requirement of periodic testing be removed from this condition and that compliance be demonstrated through daily stack observations.

Response to Comment #3

Since Second Significant Permit Modification No. 065-22611-00014, issued on October 26, 2006, required only one-time testing to demonstrate compliance with Condition D.1.2 and this testing has since been conducted, the requirement to conduct further testing has been removed from the permit.

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

...

~~(b) By April 17, 2012 in order to demonstrate compliance with Condition D.1.2, the Permittee shall perform chromium, manganese and nickel testing of the No. 11 A&P Line Jet Cooler Unit, identified as S001B and No. 11 A&P Line Shot Blast Unit, identified as S001C, exhausting to Stack P003 and the utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.~~

Comment #4

Condition D.1.7(b) contains an error. Please note that the wet chemical scrubber (D003) normally operates at a scrubbing liquid flow rate above 200 gallons per minute.

Response to Comment #4

The error has been corrected as follows:

D.1.7 Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1) [40 CFR 64, Compliance Assurance Monitoring (CAM)]

...

(b) The Permittee shall record the pressure drop across, the scrubbing liquid (water) flow rate of, and recirculation pH readings of the wet chemical scrubber controlling the No. 11 A&P Line Acid Pickling Facility, No. 12 A&P Line Acid Pickling Facility, and the No. 12 A&P Line Kolene Rinse (S001D, S002D, and S002C), at least once per day when any of the facilities are in operation. When for any one reading, the pressure drop across the wet chemical scrubber (D003) is outside the normal range of 2.0 and 10.0 inches of water, the flow rate for scrubbing liquid is ~~above~~ **less than** 200 gallons of water per minute ~~and~~ **or** the recirculation **water** pH is below 9.0 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, or a flow rate or pH below the indicated values are 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.

...

Comment #5

Subparts (a) and (b) of Condition D.3.4 contain errors. Please be advised that the normal oil pressure operating range for the Strip Grinder/Polisher is greater than 10 PSI and for the Z-mill is greater than 8 PSI.

Response to Comment #5

The errors have been corrected as follows:

D.3.4 Mist Eliminator Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64, Compliance Assurance Monitoring (CAM)]

(a) The Permittee shall record the oil pressure for the Strip Grinder/Polisher (S003A) at least once per day when the Strip Grinder/Polisher is in operation. When for any one reading, the oil pressure for the Strip Grinder/Polisher is ~~outside the normal range of~~ less than 10 PSI 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.

(b) The Permittee shall record the oil pressure for the Z-Mill (S004) at least once per day when the Z-Mill is in operation. When for any one reading, the oil pressure for the Z-Mill is ~~outside the normal range of~~ less than 8 PSI 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.

...

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:	**Allegheny Ludlum Corporation**
Source Location:	**State Route 38 West, New Castle, Indiana 47362**
County:	**Henry**
SIC Code:	**3398**
Permit Renewal No.:	**T 065-18222-00014**
Permit Reviewer:	**Mark L. Kramer**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Allegheny Ludlum Corporation relating to the operation of a stationary metal treating and cold rolled steel sheet manufacturing source.

History

On October 15, 2003, Allegheny Ludlum Corporation submitted an application to the OAQ requesting to renew its operating permit. Allegheny Ludlum Corporation was issued a Part 70 Operating Permit on July 13, 1999. The source was also issued a Minor Source Modification 065-11243-00014 on November 30, 1999, an Administrative Amendment 065-11398-00014, on December 20, 1999, a Significant Permit Modification 065-12537-00014, on March 21, 2001 a reopening 065-13314-00014, on November 11, 2001, and a Significant Permit Modification SPM 065-22611-00014, on October 26, 2006. The latest Significant Permit Modification SPM 065-22611-00014, issued on October 26, 2006 incorporated federally enforceable HAPs emission limits to make the source a minor source of HAPs which have been incorporated into the renewal as requested by the source even though NESHAP Subpart DDDDD has been vacated. Thus, the source will be minor for HAPs since the federally enforceable HAPs limits have been incorporated into the proposed renewal.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) No. 11 A&P Annealing Furnace, identified as S001A, modified in 1998, fired by natural gas and exhausting to fugitive emission point P001, maximum capacity: 27 tons of steel per hour, and maximum heat input capacity: 60 million British thermal units per hour.

(b) One (1) No. 12 A&P Annealing Furnace, identified as S002A, constructed in 1967, fired by natural gas and exhausting to fugitive emission point P005, using low NO_x burners with flue gas recirculation with a heat input capacity of 29.0 million British thermal units per hour, maximum capacity: 27 tons of steel per hour, and total maximum heat input capacity: 69.0 million British thermal units per hour.

(c) One (1) No. 11 A&P Line Jet Cooler Unit, identified as S001B, constructed in 1981, using a baghouse, identified as D001 as control, and exhausting to Stack P002, maximum capacity: 27 tons of steel per hour.

(d) One (1) No. 11 A&P Line Shot Blast Unit, identified as S001C, constructed in 1967 and replaced in 1995, using a baghouse identified as D002 as control, and exhausting to Stack P003, maximum capacity: 27 tons of steel per hour.

(e) One (1) No. 11 A&P Acid Pickling Facility, identified as S001D, constructed in 1967, using a chemical scrubber, identified as D003 as control, and exhausting to Stack P004, maximum capacity: 27 tons of steel per hour.

(f) One (1) No. 12 A&P Kolene Rinse, identified as S002C, constructed in 1967 and replaced in 1996, using a chemical scrubber, identified as D003 as control, and exhausting to Stack P004, maximum capacity: 27 tons of steel per hour.

(g) One (1) No. 12 A&P Line Acid Pickling Facility, identified as S002D, constructed in 1967, using a chemical scrubber, identified as D003 as control, and exhausting to Stack P004, maximum capacity: 27 tons of steel per hour.

(h) One (1) North Boiler, identified as S006, installed in 1966, fired by natural gas and exhausting to Stack P011, maximum heat input capacity: 20.92 million British thermal units per hour.

(i) One (1) Middle Boiler, identified as S007, installed in 2006, fired by natural gas and exhausting to Stack P012, maximum heat input capacity: 14.61 million British thermal units per hour.

(j) One (1) South Boiler, identified as S008, installed in 1966, fired by natural gas and exhausting to Stack P013, maximum heat input capacity: 10.46 million British thermal units per hour.

(k) One (1) Strip Grinder/Polisher, identified as S003A, composed of four (4) grinding heads and four (4) eliminators, constructed in 1967, using oil mist eliminators, identified as D004, D005, D006 and D008 as control, and exhausting to Stack P007, maximum capacity: 25 tons of steel per hour.

(l) One (1) Z-Mill, identified as S004, constructed in 1967, using an oil mist eliminator, identified as D007 as control, and exhausting to Stack P009, maximum capacity: 35 tons of steel per hour.

(m) One (1) Temper Mill, identified as S005, constructed in 1967, and exhausting to fugitive emission point P010, maximum capacity: 50 tons of steel per hour.

(n) Three (3) Parts Cleaners, identified as S009A, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P014, maximum throughput: 0.5 gallons of mineral spirits per hour, each.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no unpermitted emission units that have been constructed and/or operated at this source during this review process.

Emission Units and Pollution Control Equipment Removed From the Source

(o) One (1) Parts Cleaner, identified as S009B, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P015, maximum throughput: 0.5 gallons of kerosene per hour.

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

There are no proposed emission units during this review process.

Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour with a total rating of 5.0 million British thermal units per hour.

(b) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(c) Combustion source flame safety purging on startup.

(d) A gasoline fuel transfer and dispensing operation 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.

(e) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; Vessels storing lubricating oil, 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) 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]

(i) Rolling oil recovery systems.

(j) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.

(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) Heat exchanger cleaning and repair.

(o) Process vessel degassing and cleaning to prepare for internal repairs.

(p) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(q) Asbestos abatement projects regulated by 326 IAC 14-10.

(r) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(s) On-site fire and emergency response training approved by the department.

(t) Other emergency equipment as follows: Stationary fire pumps.

(u) Purge double block and bleed valves.

(v) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(w) The following equipment resulting in HAP emissions of less than one (1) ton per year:

(1) One (1) hydrofluoric acid (HF) storage tank, identified and S010A, vented through a series of three (3) knockout drums, capacity: 10,000 gallons.

(2) One (1) waste nitric acid storage tank, identified as S010B, vented through a series of three (3) knockout drums, capacity: 8,000 gallons.

(x) One (1) soap and water cleaning operation, identified as S003B, constructed in 1967, and exhausting to Stack P008, maximum capacity: 25 tons of steel per hour.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T 065-7593-00014 on July 13, 1999, the source has constructed or has been operating under the following approvals as well:

(a) Minor Source Modification 065-11243-00014, issued on November 30, 1999;

(b) Administrative Amendment 065-11398-00014, issued on December 20, 1999;

(c) Significant Permit Modification 065-12537-00014, issued on March 21, 2001;

(d) Reopening 065-13314-00014, issued on November 11, 2001, and

(e) Significant Permit Modification SPM 065-22611-00014, issued on October 26, 2006.

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.

The following terms and conditions from previous approvals have been deleted in this **Part 70 Operating Permit Renewal**:

SPM 065-22611-00014, issued on October 26, 2006

Conditions D.4.4 and D.5.4

Required that the following inspections be performed of the oil mist eliminators (D004, D005, D006, D007 and D008) controlling the Strip Grinder/Polisher and the Z-Mill:

(1) Monthly inspections of the motor amperages during normal operation:

(2) Quarterly inspections of the following operational parameters during normal operation:

(A) Mist eliminator inspections for oil/solids build up and plugging. Clean, as required.

(B) Fan impeller inspections for solids buildup or erosion. Clean or repair, as required.

(3) Annual inspections of the exhaust system components for solids buildup and signs of corrosion or excessive wear which may impact the operation of the oil mist eliminators. Clean or replace, as required.

Reason for Deletion:

IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, Conditions D.4.4 and D.5.4 requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections has been removed.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
P002	No. 11 A&P Line Jet Cooler Unit (S001B)	5.0	1.90	61,000	230
P003	No. 11 A&P Line Shot Blast Unit (S001C)	5.0	1.90	11,000	70
P004	No. 11 A&P Acid Pickling Facility (S001D), No. 12 A&P Kolene Rinse (S002C) and No. 12 A&P Line Acid Pickling Facility (S002D)	55.0	4.50	23,000	100
P007	Strip Grinder/Polisher (S003A)	25.0	2.40	10,000	100
P009	Z-Mill (S004)	55.0	3.50	25,000	80
P011	North Boiler (S006)	35.0	2.10	4,000	400
P012	Middle Boiler (S007)	35.0	2.10	4,000	400
P013	South Boiler (S008)	35.0	2.10	4,000	400

Emission Calculations

See pages 1 through 8 of Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Henry County

Pollutant	Status
PM_{10}	Attainment
$PM_{2.5}$	Attainment
SO_2	Attainment
NO_X	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Henry County has been classified as attainment for $PM_{2.5}$. 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 $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions. See the State Rule Applicability – Entire Source section.

(b) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) 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 NO_X emissions are considered when evaluating the rule applicability relating to ozone. Henry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Henry County has been classified as attainment or unclassifiable in Indiana for remaining attainment criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(e) Fugitive Emissions
Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are counted toward the determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	3,479
PM_{10}	1,438
SO_2	1.47
VOC	101
CO	67.2
NO_X	571

HAPs	tons/year
Methanol	1.12
MIBK	0.561
Chromium Compounds	11.6
Manganese Compounds	5.03
Nickel Compounds	15.4
Hydrogen Fluoride	458.9
Benzene	0.002
Dichlorobenzene	0.001
Formaldehyde	0.074
Hexane	1.78
Toluene	0.003
Lead Compounds	0.005
Cadmium Compounds	0.001
Other Insig. Act HAPs	1.51
Total	495.7

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM_{10} and NO_X are greater than one hundred (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 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 greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than one hundred (<100) tons per year.

Fugitive Emissions

Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2004 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
$PM_{2.5}$	Not Reported
PM_{10}	35.8
SO_2	0.141
VOC	58.6
CO	19.8
NO_X	210
HAP	Not Reported

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.

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.

	Potential to Emit (tons/year)						
Process/Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**Pb**
No. 11 Annealing Furnace (S001A)	0.499	2.00	0.158	13.3	22.1	26.3	-
No. 12 Annealing Furnace (S002A)	0.574	2.30	0.181	13.5	25.4	21.6	-
No. 11 Jet Cooler (S001B)	163.4	83.7	-	-	-	-	-
No. 11 Shot Blast (S001C)	163.4	163.4	-	-	-	-	-
No. 11 Acid Pickling Facility (S001D)	106	106	-	-	-	137	
No. 12 Kolene Rinse (S002C)	163.4	163.4	-	-	-	-	-
No. 12 Acid Pickling Facility (S002D)	106	106	-	-	-	137	-
North Boiler (S006)	0.174	0.696	0.055	0.504	7.70	9.16	-
Middle Boiler (S007)	0.122	0.486	0.038	0.352	5.38	6.40	-
South Boiler (S008)	0.087	0.348	0.027	0.252	3.85	4.58	-
Strip Grinder/ Polisher (S003A)	153	153	-	-	-	-	-
Z- Mill (S004)	138	138	-	0.005	-	-	-
Temper Mill (S005)	-	-		28.0			-
Three (3) Parts Cleaners (S009A)	-	-	-	8.67	-	-	-
Insignificant Activities							-
Natural Gas Combustion	0.042	0.166	0.013	0.120	1.84	2.19	0.0004
Other Insig. Act.	5.00	5.00	1.00	2.00	1.00	1.00	-
Total	**1,000**	**924**	**1.47**	**66.7**	**67.2**	**346**	**0.0004**
Major Source Threshold	**100**	**100**	**100**	**100**	**100**	**100**	**5**

(a) This existing stationary source is major for PSD because the emissions of criteria pollutants (PM, PM_{10} and NO_X) are greater than one hundred (>100) tons per year, and it is one of the twenty-eight (28) listed source categories.

(b) Fugitive Emissions
Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are counted toward the determination of PSD applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Since the unrestricted potential SO_2 and VOC emissions are less than one hundred (100) tons per year, for all emission units, except the Temper Mill (S005), therefore SO_2 and VOC are not evaluated in this table. As there are no CO control devices at this source, CO emissions are also not addressed in this table. The insignificant activities at this source have potential emissions of each criteria pollutant much less than one hundred (100) tons per year. Therefore, they are also not included in this table. The entire source is limited to less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons of the combination of HAPs, therefore HAPs only those facilities that are major for HAPs (10/25) before controls are included in this table.

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Appli-cable (Y/N)	Large Unit (Y/N)
No. 11 Annealing Furnace (S001A) PM_{10}	N	N	2.00	2.00	100	N	N
No. 11 Annealing Furnace (S001A) PM	N	Y	0.499	0.499	100	N	N
No. 11 Annealing Furnace (S001A) NO_X	N	N	26.3	26.3	100	N	N
No. 12 Annealing Furnace (S002A) PM_{10}	N	N	2.30	2.30	100	N	N
No. 12 Annealing Furnace (S002A) PM	N	Y	0.574	0.574	100	N	N
No. 12 Annealing Furnace (S002A) NO_X	N	N	21.6	21.6	100	N	N
No. 11 Jet Cooler (S001B) PM_{10}	Baghouse (D001)	N	367	5.50	100	N	N

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Appli-cable (Y/N)	Large Unit (Y/N)
No. 11 Jet Cooler (S001B) PM	Baghouse (D001)	Y	603	6.03	100	Y	N
No. 11 Shot Blast (S001C) PM_{10}	Baghouse (D002)	N	201	3.02	100	N	N
No. 11 Shot Blast (S001C) PM	Baghouse (D002)	Y	2010	20.1	100	Y	N
No. 11 Acid Pickling Facility (S001D) PM_{10}	Scrubber (D003)	N	106	1.06	100	N	N
No. 11 Acid Pickling Facility (S001D) PM	Scrubber (D003)	Y	106	1.06	100	Y	N
No. 11 Acid Pickling Facility (S001D) /NO_X	Scrubber (D003)	N	250	137	100	N	N
No. 12 Kolene Rinse (S002C) PM_{10}	Scrubber (D003)	N	355	3.55	100	N	N
No. 12 Kolene Rinse (S002C) PM	Scrubber (D003)	Y	355	3.55	100	Y	N
No. 12 Acid Pickling Facility (S002D) PM_{10}	Scrubber (D003)	N	106	1.06	100	N	N
No. 12 Acid Pickling Facility (S002D) PM	Scrubber (D003)	Y	106	1.06	100	Y	N
No. 12 Acid Pickling Facility (S002D) NO_X	Scrubber (D003)	N	250	137	100	N	N
North Boiler (S006) PM_{10}	N	N	0.696	0.696	100	N	N
North Boiler (S006) PM	N	Y	0.174	0.174	100	N	N
North Boiler (S006) NO_X	N	N	9.16	9.16	100	N	N
Middle Boiler (S007) PM_{10}	N	N	0.486	0.486	100	N	N
Middle Boiler (S007) PM	N	Y	0.122	0.122	100	N	N
Middle Boiler (S007) NO_X	N	N	6.40	6.40	100	N	N
South Boiler (S008) PM_{10}	N	N	0.348	0.348	100	N	N
South Boiler (S008) PM	N	Y	0.087	0.087	100	N	N
South Boiler (S008) NO_X	N	N	4.58	4.58	100	N	N

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Appli-cable (Y/N)	Large Unit (Y/N)
Strip Grinder/ Polisher (S003A) PM_{10}	Oil Mist Eliminators (D004 - D006, D008)	N	153	15.3	100	N	N
Strip Grinder/ Polisher (S003A) PM	Oil Mist Eliminators (D004 - D006, D008)	Y	153	15.3	100	Y	N
Z- Mill (S004) PM_{10}	Oil Mist Eliminator (D007)	N	138	55.2	100	N	N
Z- Mill (S004) PM	Oil Mist Eliminator (D007)	Y	138	55.2	100	Y	N
Temper Mill (S005) /VOC	N	N	28.0	28.0	100	N	N
No. 11 A&P Acid Pickling Facility (S001D) HAPs	Scrubber (D003)	Y	229	2.29	10/25	Y	N
No. 12 A&P Acid Pickling Facility (S002D) HAPs	Scrubber (D003)	Y	229	2.29	10/25	Y	N

This source does involve pollutant-specific emissions units as defined in 40 CFR 64.1 that each has the potential to emit before controls equal to or greater than the major source threshold for PM, that is subject to an emission limitation or standard (326 IAC 6-3-2) for PM, where PM is the surrogate for PM_{10}. Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to No. 11 A&P Line Jet Cooler Unit (S001B) for PM, No. 11 A&P Line Shot Blast Unit (S001C) for PM, No. 11 A&P Acid Pickling Facility (S001D) for PM and HAPs, No. 12 A&P Kolene Rinse (S002C) for PM, No. 12 A&P Acid Pickling Facility (S002D) for PM and HAPs, Strip Grinder/Polisher (S003A) for PM and Z-Mill (S004) for PM. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

(b) The requirements of 40 CFR 420.90, Subpart I (New Source Performance Standards for Iron and Steel Manufacturing Point Source Category, Subpart I, Acid Pickling Subcategory) are not included in this permit because the acid pickling pollutants are not discharged to a public owned treatment works.

(c) The requirements of 40 CFR 60.40(b), Subpart Db (New Source Performance Standards for Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, Subpart Db,) are not included in this permit because the boilers, identified as S006 and S008,were constructed in 1966, which is prior to the applicability date of June 19, 1984.

(d) The one (1) natural gas-fired Middle Boiler, identified as S007, installed in 2006, rated at 14.61 million British thermal units per hour, is subject to the requirements of the New Source Performance Standards of Performance (NSPS) for Small Industrial - Commercial -

Institutional Steam Generating Units, Subpart Dc (40 CFR 60.40c) because the boiler was constructed after June 9, 1989 and is rated between ten (10) and one hundred (100) million British thermal units per hour.

Nonapplicable portions of the NSPS will not be included in the permit. The one (1) natural gas-fired Middle Boiler, identified as S007, installed in 2006, is subject to the following portions of Subpart Dc:

(1) 40 CFR 60.40c

(2) 40 CFR 60.41c

(3) 40 CFR 60.48c(a)(1), (a)(3), (g), (i), and (j)

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

(f) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Parts 61/63) included in this permit renewal.

State Rule Applicability - Entire Source

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

The source was constructed prior to August 7, 1977 and this source had a potential to emit of more than one hundred (100) tons per year of PM, PM_{10}, VOC and $NO_{X.}$ This type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and fugitive emissions are counted toward the determination of PSD applicability. Therefore, this source was a major PSD source before August 7, 1977, the applicability date of the rule.

Subsequent modifications to the source after 1977 have all been minor. Three (3) Parts Cleaners, identified as S009A, constructed between 1980 and modified in 1988, have a potential to emit VOC of less than forty (40) tons per year.

Pursuant to MSM 065-11243-00014, issued on November 30, 1999, the No. 12 A & P Line Annealing Furnace, identified as S002A, had increased its capacity from forty (40) million British thermal units per hour to sixty-nine (69) British thermal units per hour. The uncontrolled potential to emit of PM was 0.574 tons per year, PM_{10} was 2.30 tons per year, SO_2 was 0.181 tons per year, VOC was 13.5 tons per year, CO was 0.00 tons per year (now 25.4 tons per year) and NO_X was 21.6 tons per year. These potentials are all less than the PSD significant levels. Therefore, this modification was considered a minor modification to an existing major source under 326 IAC 2-2 (PSD).

Pursuant to SPM 065-22611-00014, issued on October 26, 2006, the uncontrolled emissions from each criteria pollutant, from the replacement Middle Boiler, identified as S007, are less than PSD significant levels. Therefore, this modification was considered a minor modification to an existing major source under 326 IAC 2-2 (PSD).

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

The No. 11 A&P Annealing Furnace, identified as S001A, was modified in 1998, and the Middle Boiler, identified as S007, was constructed in 2006; both after the July 27, 1997 applicability date of this rule. Each of these emission units has a worst case single HAP less than ten (10) tons per year and a combination of HAPs less than twenty-five (25) tons per year.

Part 70 Minor Source Limit for HAPs [326 IAC 2-7]

The operation of a stationary metal treating and cold rolled steel sheet manufacturing source shall be limited to less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. The following limits shall ensure that the source shall emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

Unit ID	HAP	Hourly HAP Emission Rate (pounds per hour)
S001B	Chromium Compounds	0.02
	Manganese Compounds	0.07
	Nickel Compounds	0.19
S001C	Chromium Compounds	0.30
	Manganese Compounds	0.20
	Nickel Compounds	1.10
S001D	Hydrogen Fluoride (Hydrofluoric Acid (HF))	0.60
S002C	Chromium Compounds	0.17
S002D	Hydrogen Fluoride (Hydrofluoric Acid (HF))	0.60

Compliance with the above limits combined with HAPs emissions from other emission units shall limit the source-wide single HAP and combined HAPs to less than ten (10) and twenty-five (25) tons per year and will make the source an area source for HAPs.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This source does not have the potential to emit of two thousand five hundred (2,500) tons per year of CO, NO_X or SO_2, or two hundred fifty (250) tons per year of VOC or PM_{10}. Therefore, pursuant to 326 IAC 2-6-3(b)(2), an emission statement must be submitted triennially rather than annually. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2005 and every 3 years after. Therefore, the next emission statement for this source must be submitted by July 1, 2008. 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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the following emission units and control devices shall not exceed the pounds per hour limitation when operating at the stated process weight rates calculated using the following equations:
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.

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

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

The baghouses and scrubbers shall be in operation at all times the associated facilities are in operation, in order to comply with these limits.

Unit ID / Control Device or Stack	Total Process Weight (tons per hour)	Total PM Emission Rate Before Controls (pounds per hour)	Total Potential PM Emission Rate After Controls (pounds per hour)	Allowable PM Rate (pounds per hour)
S001A / P001	27.0	0.114	0.114	37.3
S002A / P005	27.0	0.131	0.131	37.3
S001B / D001	27.0	138	1.38	37.3
S001C / D002	27.0	459	4.59	37.3
S001D / D003	27.0	24.3	0.243	37.3
S002C / D003	27.0	81.0	0.810	37.3
S002D / D003	27.0	24.3	0.243	37.3
S003A / D004, D005, D006, and D008	25.0	35.0	3.50	35.4
S004 / D007	35.0	31.5	12.6	41.3

The particulate rate calculated shows that each emission unit can comply with the calculated allowable particulate emission rate pursuant to 326 IAC 6-3-2 as shown in the above table and also presented on page 7 of 8 of Appendix A. The baghouses and scrubbers shall be in operation at all times the associated facilities are in operation, in order to comply with these limits.

326 IAC 6-2-3 (Particulate Emissions Limitations for Facilities Constructed prior to June 8, 1972)

The North Boiler, identified as S006, Middle Boiler, identified as S007, and the South Boiler, identified as S008, were originally installed in 1966 and were subject to 326 IAC 6-2-3(b). The total heat input capacity for the three (3) boilers was 41.84 million British thermal units per hour. The

Middle Boiler was replaced in 2006. Therefore, the North and South Boilers will be limited by the following equation:

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

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 million British thermal units per hour heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height will be computed using a weighted average of stack heights.

Pt = $(50\ \mu g/m3 \times 0.67 \times 35\ ft) / (76.5 \times 41.84^{0.75} \times 3^{0.25}) = 0.708$ lb PM / mmBtu

The two (2) boilers will be limited to emissions of 0.708 pound PM per million British thermal units (mmBtu). The potential PM emissions of the two (2) boilers are:

0.261 tons of PM per year / 31.38 mmBtu per hour = 0.0596 pounds of PM per hour / 31.38 mmBtu per hour = 0.002 pounds of PM per million British thermal units.

Therefore, the two (2) boilers (North and South) can comply with this rule.

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

The particulate emissions from the Middle Boiler, identified as S007, installed in 2006, with a heat input capacity of 14.61 million British thermal units per hour, shall be limited by the following equation given in 326 IAC 6-2-4:

$Pt = 1.09/Q^{0.26}$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input, which is 45.99 million British thermal units per hour, including the Middle Boiler and the two (2) existing boilers (North and South Boilers, rated at 20.92 and 10.46 million British thermal units per hour, respectively) at this source. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For the boiler: $Pt = 1.09/(45.99)^{0.26} = 0.403$ lb/mmBtu heat input

Based on page 5 of Appendix A, the potential PM emission rate of the boiler is:

0.122 tons/yr × (2000 lbs/ton / 8760 hrs/yr) = 0.028 lbs/hr
(0.028 lbs/hr / 14.61 mmBtu/hr) = 0.002 lbs PM per mmBtu

Therefore, the Middle Boiler can comply with this rule.

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

Pursuant to 326 IAC 8-3-2, for the cold cleaner operations, 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 operating 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.

326 IAC 8-3-5 (Cold cleaner degreaser operation and control)

Pursuant to 326 IAC 8-3-1 (Applicability), the requirements of 326 IAC 8-3-5 only apply to any new facility, construction of which commences after July 1, 1990, located in any county. Since the three (3) parts cleaners, identified as S009A, were constructed between 1980 and 1988, the requirements of 326 IAC 8-3-5 are not applicable to these facilities.

326 IAC 12 (New Source Performance Standards)

The natural gas-fired Middle Boiler, identified as S007, installed in 2006, rated at 14.61 million British thermal units per hour, is subject to the requirements of the New Source Performance Standards of Performance (NSPS) for Small Industrial - Commercial - Institutional Steam Generating Units, Subpart Dc (40 CFR 60.40c).

40 CFR 60, Subpart Dc, was revised June 13, 2007. However, pursuant to 326 IAC 1-1-3, the version of the rule referenced by 326 IAC 12 was the version in existence on February 27, 2006, which was recently amended on June 13, 2007. Only the Federal version of the rule applies.

State Rule Applicability – Insignificant Activities

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

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the brazing, cutting, soldering, welding and trimming, drilling and sanding operations shall not exceed allowable PM emission rate based on the following equation:

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

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

(b) All insignificant natural gas combustion units each have potential PM emissions less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), these emission units are exempt from the requirements of 326 IAC 6-3-2.

Previous Stack Test

Pursuant to SPM 065-22611-00014, the Permittee performed HAPs (chromium, manganese and nickel compounds) testing for the No. 11 A&P Line Jet Cooler Unit, identified as S001B, and the No. 11 A&P Line Shot Blast Unit, identified as S001C, on April 17 - 19, 2007. The test report was received by IDEM, OAQ on May 21, 2007 and has been approved by IDEM, OAQ. IDEM, OAQ, has determined that although the HAPs emissions were much lower than the actual HAPs limits, re-testing will be required to verify compliance with the HAPs in five (5) years since the control device can degrade with time. The results of the stack test are listed in the following table:

Emission Unit	HAP	Test Result (lb/hr)	Limit (lb/hr)
No. 11 A&P Line Jet Cooler Unit (S001B)	Chromium Compounds	0.0004	0.02
	Manganese Compounds	0.0012	0.07
	Nickel Compounds	0.002	0.19
No. 11 A&P Line Shot Blast Unit (S001C)	Chromium Compounds	0.002	0.30
	Manganese Compounds	0.0002	0.20
	Nickel Compounds	0.003	1.10

Proposed Stack Tests

Within ninety (90) days of issuance of the Part 70 Operating Permit Renewal T 065-18222-00014, the No. 11 A&P Line Shot Blast Unit, identified as S001C, using a baghouse, identified as D002, exhausting to Stack P003, shall be stack tested for compliance with 326 IAC 6-3-2 utilizing methods as approved by the Commissioner and every 5 years from the last valid compliance demonstration.

In addition, by April 19, 2012, the No. 11 A&P Line Jet Cooler Unit, identified as S001B and the No. 11 A&P Line Shot Blast Unit, identified as S001C, shall be stack tested for compliance with chromium, manganese and nickel compound emission rate limits utilizing methods as approved by the Commissioner and every five (5) years from the last valid compliance demonstration.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination

Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouses D001 and D002 used in conjunction with No. 11 A&P Line Jet Cooler and No. 11 A&P Line Shot Blast Unit	Pressure Drop	Daily	3.0 to 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

These monitoring conditions are necessary in order to show compliance with 326 IAC 6-3-2, 326 IAC 5-1, 326 IAC 2-7 and 40 CFR 64 (CAM).

Control	Parameter	Frequency	Range	Excursions and Exceedances
Wet Chemical Scrubber D003 controlling the No. 11 A&P Line Acid Pickling Facility, No. 12 A&P Line Kolene Rinse, and the No. 12 A&P Line Acid Pickling Facility	Water Pressure Drop	Daily	2.0 to 10.0 inches	Response Steps
	Scrubbing Liquid Flow Rate		Above 200 gallons per minute	
	Recirculation pH readings		Below 9.0	
	Visible Emissions		Normal-Abnormal	

These monitoring conditions are necessary in order to show compliance with 326 IAC 6-3-2, 326 IAC 5-1, 326 IAC 2-7 and 40 CFR 64 (CAM).

Control	Parameter	Frequency	Range	Excursions and Exceedances
Oil Mist Eliminators D004, D005, D006 and D008	Oil Pressure for EU	Daily	Less than 10 PSI	Response Steps
	Visible Emissions	Daily	Normal-Abnormal	
Oil Mist Eliminator D0007	Oil Pressure for EU	Daily	Less than 8 PSI	Response Steps
	Visible Emissions	Daily	Normal-Abnormal	

Note: The oil pressure shall be measured for the Strip Grinder/Polisher (SO03A) and for the Z-Mill (S004) daily and will serve as the compliance monitoring for the mist eliminator controls (D004, D005, D006, D007 and D008).

These monitoring conditions are necessary in order to show compliance with 326 IAC 6-3-2, 326 IAC 5-1, 326 IAC 2-7 and 40 CFR 64, (CAM).

Recommendation

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

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

An application for the purposes of this review was received on October 15, 2003. Additional information was received on September 20, 21 and 24, 2007.

Conclusion

The operation of this stationary metal treating and cold rolled steel sheet manufacturing source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. 065-18222-00014.

Appendix A: Emissions Calculations
Potential Emissions

Company Name: Allegheny Ludlum Corporation
Address City IN Zip: State Route 38 West, New Castle, IN 47362
Part 70: T 065-18222-00014
Reviewer: Mark L. Kramer
Date: October 5, 2007

S001B **No. 11 A&P Line Jet Cooler Unit**

Capacity tons/hr		Control efficiency (%)	Baghouse
27	PM	99.0%	
	PM-10	98.5%	

Pollutant

	PM	PM10	Chromium	Manganese	Nickel	Allowable PM
Emission Factor in lb/ton	**5.1**	**3.1**	0.0125	0.0375	0.0625	326 IAC 6-3-2
SCC 3-03-009-32 FIRES v. 6.25	0.1	0.1				
Potential Emission in lbs/hr	137.7	83.7	0.338	1.01	1.688	37.3
Potential Emission in tons/yr	603	367	1.478	4.43	7.39	
Emissions After Controls in lbs/hr	1.38	1.26	0.003	0.010	0.017	37.3
Emissions After Controls in tons/yr	6.03	5.50	0.015	0.044	0.074	

The after control HAPs emission factors are from the April 2007 stack tests of the Jet Cooler baghouse. At 16 TPH, Cr = 0.0004 lbs/hr, Ni = 0.002 lbs/hr & Mn = 0.0012 lbs/hr, which yields EF of 0.00003, 0.00013, & 0.00008 lbs/tons for Cr, Ni & Mn, respectively. These EFs were conservatively multiplied by 5 and divided by (1- CE) to obtain the before control EFs.

Methodology

Potential Emissions (lbs/hr) = Emission Factor (lbs/ton) x Capacity (tons/hr)
Potential Emissions (tons/yr) = Potential Emissions (lbs/hr) x 8,760 hrs/yr x 1 ton / 2,000 lbs
Potential Emissions After Controls = Potential Emissions x (1 - Control Efficiency)
The emission factors were computed by the applicant using stack test data and mass balance calculations.
Pursuant to 326 IAC 6-3-2, for process weight rates (PWR) less than 30 tons/hour, allowable PM = 4.1(PWR)^.67, where PWR is in tons/hr

S001C **No. 11 A&P Line Shot Blast Unit**

Capacity tons/hr	Control efficiency (%)	Baghouse
27	99.0%	
	98.5%	

Pollutant

SCC 3-04-003-40 FIRES V. 6.25	PM	PM10	Chromium	Manganese	Nickel	Allowable PM
Emission Factor in lb/ton	17	1.7	0.046	0.005	0.068	326 IAC 6-3-2
Potential Emission in lbs/hr	459	45.9	1.242	0.135	1.836	37.3
Potential Emission in tons/yr	2010	201	5.440	0.59	8.04	
Emissions After Controls in lbs/hr	4.59	0.689	0.012	0.001	0.018	37.3
Emissions After Controls in tons/yr	20.1	3.02	0.054	0.006	0.080	

The after control HAPs emission factors are from the April 2007 stack tests of the shot blast baghouse. At 22 TPH, Cr = 0.002 lbs/hr, Ni = 0.003 lbs/hr & Mn = 0.0002 lbs/hr, which yields EF of 0.0009, 0.00014, & 0.00001 lbs/tons for Cr, Ni & Mn, respectively. These EFs were conservatively multiplied by 5 and divided by (1- CE) to obtain the before control EFs.

Appendix A: Emissions Calculations
Potential Emissions

Company Name: Allegheny Ludlum Corporation
Address City IN Zip: State Route 38 West, New Castle, IN 47362
Part 70: T 065-18222-00014
Reviewer: Mark L. Kramer
Date: October 5, 2007

S001D **No. 11 A&P Line Acid Pickling Facility**

Capacity tons/hr		Control efficiency (%)
27	PM/PM10	99.0%
	NOx	45.0%

Wet Chemical Scrubber

	Pollutant				
	PM	PM10	NOx	HF	Allowable PM
Emission Factor in lb/ton	0.9	0.9	2.112	1.94	326 IAC 6-3-2
Potential Emission in lbs/hr	24.3	24.3	57.0	52.4	37.3
Potential Emission in tons/yr	106	106	250	229.5	
Emissions After Controls in lbs/hr	0.243	0.243	31.4	0.524	37.3
Emissions After Controls in tons/yr	1.06	1.06	137	2.295	

PM and PM-10 emission factors are based on a 1993 stack test at the No. 11 and No. 12 A&P Lines acid fume scrubber.
NOx emission factor is based on a 1994 stack test with a 9% safety factor at a similar mixed acid fume scrubber located at their Vandergrift, PA facility.

The after control HAP emission factor is from the April 2007 stack tests of the Nos. 11 & 12 A&P Line Acid Pickling Facility scrubber. At 20.1 TPH for each line, HF = 0.26 lbs/hr, which yields EF of 0.0065 lbs/ton for HF. This EF was conservatively multiplied by 3 and divided by (1- CE) to obtain the before control EF of 1.94 lbs/ton.

S002C **No. 12 A&P Kolene Rinse**

Capacity tons/hr	Control efficiency (%)
27	99.0%

Wet Chemical Scrubber

	Pollutant			
	PM	PM10	Chromium	Allowable PM
Emission Factor in lb/ton	3	3	0.040	326 IAC 6-3-2
Potential Emission in lbs/hr	81.0	81	1.08	37.3
Potential Emission in tons/yr	355	355	4.73	
Emissions After Controls in lbs/hr	0.810	0.810	0.011	37.3
Emissions After Controls in tons/yr	3.55	3.55	0.047	

PM = PM-10 and the manufacturer estimates that uncontrolled PM emissions rate of 45 lbs/hr for a throughput of 15 tons of steel pe hour is equivalent to 3 lbs of PM/PM-10 per ton of steel.

The after control HAPs emission factor is from the April 2007 stack tests of the Kolene Rinse scrubber. At 25.3 TPH, Cr = 0.002 lbs/hr, which yields EF of 0.0000 lbs/ton for Cr. This EFs was conservatively multiplied by 5 and divided by (1- CE) to obtain the before control EF off 0.040 lb/ton.

S002D **No. 12 A&P Line Acid Pickling Facility**

Capacity tons/hr		Control efficiency (%)
27	PM/PM10	99.0%
	NOx	45.0%

Wet Chemical Scrubber

	Pollutant				
	PM	PM10	NOx	HF	Allowable PM
Emission Factor in lb/ton	0.9	0.9	2.112	1.94	326 IAC 6-3-2
Potential Emission in lbs/hr	24.3	24.3	57.0	52.4	37.3
Potential Emission in tons/yr	106	106	250	229.5	
Emissions After Controls in lbs/hr	0.243	0.243	31.4	0.524	37.3
Emissions After Controls in tons/yr	1.06	1.06	137	2.29	

PM and PM-10 emission factors are based on a 1993 stack test at the No. 11 and No. 12 A&P Lines acid fume scrubber.
NOx emission factor is based on a 1994 stack test with a 9% safety factor at a similar mixed acid fume scrubber located at their Vandergrift, PA facility.

The after control HAP emission factor is from the April 2007 stack tests of the Nos. 11 & 12 A&P Line Acid Pickling Facility scrubber. At 20.1 TPH for each line, HF = 0.26 lbs/hr, which yields EF of 0.0065 lbs/ton for HF. This EF was conservatively multiplied by 3 and divided by (1- CE) to obtain the before control EF of 1.94 lbs/ton.

Appendix A: Emissions Calculations
Potential Emissions

Company Name: Allegheny Ludlum Corporation
Address City IN Zip: State Route 38 West, New Castle, IN 47362
Part 70: T 065-18222-00014
Reviewer: Mark L. Kramer
Date: October 5, 2007

S003A **Strip Grinder/Polisher**

Capacity tons/hr		Control efficiency (%)
25	PM/PM10	90.0%

Mist Eliminator

	Pollutant		
	PM	PM10	Allowable PM
Emission Factor in lb/ton	1.40	1.40	326 IAC 6-3-2
Potential Emission in lbs/hr	35.0	35.0	35.4
Potential Emission in tons/yr	153	153	
Emissions After Controls in lbs/hr	3.50	3.50	35.4
Emissions After Controls in tons/yr	15.3	15.3	

The PM & PM-10 emission factors are based on the 1995 stack test on a similar Strip Grinder/Polisher located ar their West Leechburg, PA facility.

S004 **Z-Mill**

Capacity tons/hr		Control efficiency (%)
35	PM/PM10	60.0%
	VOC	0.0%

Mist Eliminator

	Pollutant			
	PM	PM10	VOC	Allowable PM
Emission Factor in lb/ton	0.9	0.9	0.00003	326 IAC 6-3-2
Potential Emission in lbs/hr	31.5	31.5	0.00105	41.3
Potential Emission in tons/yr	138	138	0.005	
Emissions After Controls in lbs/hr	12.6	12.6	0.001	41.3
Emissions After Controls in tons/yr	55.2	55.2	0.005	

The PM & PM-10 emission factors are based on the November 1995 stack test on a similar Z-Mill located ar their Vandergrift, PA facility.

S005 **Temper Mill**

Capacity tons/hr	Control efficiency (%)
50	0.0%

	Pollutant		
	Methanol	MIBK	VOC
Emission Factor in lb/ton	0.005	0.003	0.1280
Potential Emission in lbs/hr	0.256	0.128	6.40
Potential Emission in tons/yr	1.12	0.561	28.0
Emissions After Controls in lbs/hr	0.256	0.128	6.40
Emissions After Controls in tons/yr	1.12	0.561	28.0

Density of Red Band Alcohol (maximum specific gravity = 0.815)	6.80	lbs/gal	
Consumption 7 drums @55 gal each =	385	gal/12-month period	
Processed	99,000	tons of steel/12-month period	
# of gallons of Red Band Alcohol/ton of steel = 385/99,000 gal/ton =	0.0039	gal/ton	
Potential Steel Production = 50 ton/hr * 8,760 hrs/yr =	438000	tons/yr	
Potential Usage of Red Band Alcohol = 438,000 tons/yr * 0.004 gal/ton =	1752	gal/yr =	32 drums of 55 gallons each
Conservatively assume 150 drums of 55 gal each are utilized per yr. =	8250	gal/yr	
8,250 gallons/yr weighs 8,250 gallons * 6.80 lbs/gal =	56076	lbs/yr	
Therefore, VOC PTE = 56076 pounds/yr * 1 ton/2,000 lbs	28.0	tons/yr	
MSDS MeOH 4% maximum by weight	1.12	tons/yr	
MSDS MIBK 2% maximum by weight	0.561	tons/yr	

Appendix A: Emissions Calculations
Potential Emissions

Company Name: **Allegheny Ludlum Corporation**
Address City IN Zip: **State Route 38 West, New Castle, IN 47362**
Part 70: **T 065-18222-00014**
Reviewer: **Mark L. Kramer**
Date: **October 5, 2007**

Natural Gas- Fired Annealing Furnaces S001A and S002A

Heat Input Capacity MMBtu/hr		Potential Throughput MMCF/yr	Capacity tons/hr
60	**S001A**	525.6	27
40	**S002A**	350.4	27
29	**S002A (Low NOx Burners)**	254.0	

			Pollutant					
			PM*	PM10*	SO2	NOx**	VOC	CO
Combustion Emission Factor in lb/MMCF			1.90	7.60	0.600	100 32	5.50	84.0
Process Emission Factor in lbs/ton			0.00	0.00	0.00	0.0	0.1	0.00
Potential Emissions in tons/yr	Combustion	S001A	0.499	2.00	0.158	26.3	1.45	22.1
	Process	S001A	0.000	0.000	0.000	0.000	11.8	0.000
	Combustion	S002A	0.333	1.33	0.105	17.5	0.964	14.7
	Combustion	S002A Low NOx	0.241	0.965	0.076	4.06	0.699	10.7
	Process	S002A	0.000	0.000	0.000	0.000	11.8	0.000
		Subtotal S001A	**0.499**	**2.00**	**0.158**	**26.3**	**13.3**	**22.1**
		Subtotal S002A	**0.574**	**2.30**	**0.181**	**21.6**	**13.5**	**25.4**
	Total	**S001A & S002A**	**1.074**	**4.29**	**0.339**	**47.9**	**26.8**	**47.5**

*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

SCC 03-04-003-05 FIRES v. 6.25 Process Emissions for VOC

Methodology

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

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

Potential Emissions (tons/yr) = Emission Factor (lbs/ton) x Capacity (tons/hr) x 8,760 hrs/yr x 1 ton / 2,000 lbs

Appendix A: Emissions Calculations
Potential Emissions

Company Name: Allegheny Ludlum Corporation
Address City IN Zip: State Route 38 West, New Castle, IN 47362
Part 70: T 065-18222-00014
Reviewer: Mark L. Kramer
Date: October 5, 2007

Natural Gas-Fired Boilers

Heat Input Capacity MMBtu/hr		Potential Throughput MMCF/yr
20.92	**North Boiler S006**	183.3
14.61	**Middle Boiler S007**	128.0
10.46	**South Boiler S008**	91.6

			Pollutant					
			PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF			1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emissions in tons/yr	North	S006	0.174	0.696	0.055	9.16	0.504	7.70
	Middle	S007	0.122	0.486	0.038	6.40	0.352	5.38
	South	S008	0.087	0.348	0.027	4.58	0.252	3.85

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

Methodology

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

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

		HAPs - Organics				
		Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf		0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	North	0.000192	0.000110	0.006872	0.164933	0.000312
	Middle	0.000134	0.000077	0.004799	0.115185	0.000218
	South	0.000096	0.000055	0.003436	0.082467	0.000156

		HAPs - Metals					
		Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf		0.0005	0.0011	0.0014	0.0004	0.0021	**Subtotal**
Potential Emission in tons/yr	North	0.000046	0.000101	0.000128	0.000035	0.000192	**0.173**
	Middle	0.00003	0.00007	0.00009	0.00002	0.00013	**0.121**
	South	0.000023	0.000050	0.000064	0.000017	0.000096	**0.086**
						Total HAPs	0.380

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Insignificant Natural Gas-Fired Combustion (No Boilers)

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.00	43.8

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.042	0.166	0.013	2.19	0.120	1.84

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

Methodology

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

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

Appendix A: Emissions Calculations
Potential Emissions

Company Name: Allegheny Ludlum Corporation
Address City IN Zip: State Route 38 West, New Castle, IN 47362
Part 70: T 065-18222-00014
Reviewer: Mark L. Kramer
Date: October 5, 2007

All HAPs From Natural Gas Combustion at the Source

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
179.99	1577

Emission Unit	Heat Input Capacity MMBtu/hr	Emission Unit	Heat Input Capacity MMBtu/hr
S001A	60.00	S008	10.46
S002A	69.00	Insignif. Act.	5.00
S006	20.92	**Total**	**179.99**
S007	14.61		

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.001656	0.000946	0.059127	1.419041	0.002680

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	**Total**
Potential Emission in tons/yr	0.00039	0.00087	0.00110	0.00030	0.00166	**1.49**

Three Parts Cleaners at 0.5 gallons/hour each w/sealed reservoir as control

S009A			Gal of Mat	Maximum	Potential VOC Before Control	Potential VOC After Control
Safety-Kleen 105 Solvent-MS	Density (lbs/gal)	Weight Organic (%)	gal/unit	(unit/hour)	(tons/yr)	(tons/yr)
No HAPs	6.6	100.00%	0.5	3	43.4	8.67

Potential VOC Before Controls (tons/yr) = Density (lbs/gal)* % VOC * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Potential VOC after Controls (tons/yr = Potential VOC Before Control (tons/yr * (1 - control efficiency)

Appendix A: Emissions Calculations
Potential Emissions

Company Name: Allegheny Ludlum Corporation
Address City IN Zip: State Route 38 West, New Castle, IN 47362
Part 70: T 065-18222-00014
Reviewer: Mark L. Kramer
Date: October 5, 2007

Summary of Emissions

Uncontrolled Potential Emissions

Significant Emission Units	PM	PM-10	SO2	NOx	VOC	CO	Lead	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
S001B	603	367	0.00	0.00	0.00	0.00	0.00	13.30
S001C	2010	201	0.00	0.00	0.00	0.00	0.00	14.1
S001D	106	106	0.00	250	0.00	0.00	0.00	229.46
S002C	355	355	0.00	0.00	0.00	0.00	0.00	4.73
S002D	106	106	0.00	250	0.00	0.00	0.00	229.5
S003A	153	153.3	0.00	0.00	0.00	0.00	0.00	0.00
S004	138	138	0.00	0.00	0.005	0.00	0.00	0.00
S005	0.00	0.00	0.00	0.00	28.0	0.00	0.00	1.68
S001A	0.499	2.00	0.158	26.3	13.3	22.1	0.00	0.00
S002A	0.574	2.30	0.181	21.6	13.5	25.4	0.00	0.00
S006	0.174	0.696	0.055	9.16	0.504	7.70	0.00	0.00
S007	0.122	0.486	0.038	6.40	0.352	5.38	0.00	0.00
S008	0.087	0.348	0.027	4.58	0.252	3.85	0.00	0.00
S009A	0.000	0.000	0.000	0.00	43.4	0.00	0.00	0.00
Natural Gas Combustion HAPs Only	0.000	0.000	0.000	0.00	0.00	0.00	0.0004	1.49
Subtotal Significant Emission Unit	**3474**	**1432**	**0.460**	**568**	**99.3**	**64.4**	**0.0004**	**494.2**
Natural Gas Combustion	0.042	0.166	0.013	2.19	0.120	1.84	0.00	See NG HAPs Only
Other Insig. Activities	5.00	5.00	1.00	1.00	2.00	1.00	0.00	1.51
Subtotal Insignificant Activities	5.04	5.17	1.01	3.19	2.12	2.84	0.00	1.51
Total	**3479**	**1438**	**1.47**	**571**	**101**	**67.2**	**0.00**	**495.7**

Limited Emissions

Significant Emission Units	PM	PM-10	SO2	NOx	VOC	CO	Lead	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
S001B	163.4	83.7	0.00	0.00	0.00	0.00	0.00	0.133
S001C	163.4	163.4	0.00	0.00	0.00	0.00	0.00	0.141
S001D	106	106	0.00	137	0.00	0.00	0.00	2.295
S002C	163.4	163.4	0.00	0.00	0.00	0.00	0.00	0.047
S002D	106	106	0.00	137	0.00	0.00	0.00	2.295
S003A	153	153	0.00	0.00	0.00	0.00	0.00	0.00
S004	138	138	0.00	0.00	0.005	0.00	0.00	0.00
S005	0.00	0.00	0.00	0.00	28.0	0.00	0.00	1.68
S001A	0.499	2.00	0.158	26.3	13.3	22.1	0.00	0.00
S002A	0.574	2.30	0.181	21.6	13.5	25.4	0.00	0.00
S006	0.174	0.696	0.055	9.16	0.504	7.70	0.00	0.00
S007	0.122	0.486	0.038	6.40	0.352	5.38	0.00	0.00
S008	0.087	0.348	0.027	4.58	0.252	3.85	0.00	0.00
S009A	0.00	0.00	0.00	0.00	8.67	0.00	0.00	0.00
Natural Gas Combustion HAPs Only							0.0004	1.49
Subtotal Significant Emission Unit	**995**	**919.3**	**0.460**	**343**	**64.6**	**64.4**	**0.00**	**8.08**
Natural Gas Combustion	0.042	0.166	0.013	2.19	0.120	1.84	0.00	See NG HAPs Only
Other Insig. Activities	5.00	5.00	1.00	1.00	2.00	1.00	0.00	1.51
Subtotal Insignificant Activities	**5.04**	**5.17**	**1.01**	**3.19**	**2.12**	**2.84**	**0.00**	**1.51**
Total	**1000**	**924**	**1.47**	**346**	**66.7**	**67.2**	**0.0004**	**9.59**

Appendix A: Emissions Calculations
Potential Emissions

Company Name: Allegheny Ludlum Corporation
Address City IN Zip: State Route 38 West, New Castle, IN 47362
Part 70: T 065-18222-00014
Reviewer: Mark L. Kramer
Date: October 5, 2007

Summary of Emissions

Uncontrolled Potential HAPs Emissions

Significant Emission Units	Methanol	MIBK	Chromium	Manganese	Nickel	HF	Other HAPs	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
S001B	0.00	0.00	1.48	4.43	7.39	0.00	0.00	13.3
S001C	0.00	0.00	5.44	0.59	8.0	0.00	0.00	14.1
S001D	0.00	0.00	0.00	0.00	0.00	229.5	0.00	229.5
S002C	0.00	0.00	4.73	0.00	0.00	0.00	0.00	4.73
S002D	0.00	0.00	0.00	0.00	0.00	229.5	0.00	229.5
S003A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
S004	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
S005	1.12	0.561	0.00	0.00	0.00	0.00	0.00	1.68
All Combustion HAPs From S001A, S002A, S006, S007, S008 & Insig. Act.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.49
Other Insig. Activities	0.00	0.00	0.00	0.00	0.00	0.00	1.51	1.51
Total	**1.12**	**0.561**	**11.6**	**5.03**	**15.4**	**458.9**	**1.51**	**495.7**

Controlled Potential HAPs Emissions

Significant Emission Units	Methanol	MIBK	Chromium	Manganese	Nickel	HF	Other HAPs	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
S001B	0.00	0.00	0.015	0.044	0.074	0.00	0.00	0.133
S001C	0.00	0.00	0.054	0.006	0.080	0.00	0.00	0.141
S001D	0.00	0.00	0.00	0.00	0.00	2.29	0.00	2.29
S002C	0.00	0.00	0.047	0.00	0.00	0.00	0.00	0.047
S002D	0.00	0.00	0.00	0.00	0.00	2.29	0.00	2.29
S003A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
S004	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
S005	1.12	0.561	0.00	0.00	0.00	0.00	0.00	1.68
All Combustion HAPs From S001A, S002A, S006, S007, S008 & Insig. Act.	0.00	0.00	0.00	0.00	0.00	0.00	3.00	3.00
Total	**1.12**	**0.561**	**0.116**	**0.050**	**0.154**	**4.59**	**3.00**	**9.59**