



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

August 17, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant  
RE: Outokumpu Stainless, Inc. / 065-18614-00003  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

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

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

---

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August 17, 2004

Mr. Chris Streit  
Outokumpu Stainless, Inc.  
549 West State Road 38  
New Castle, IN 47632

Re: 065-18614  
First Significant Permit Modification to  
Part 70 Permit No.: 065-7398-00003

Dear Mr. Streit:

Outokumpu Stainless, Inc. was issued a Part 70 permit on June 15, 1999, for the manufacturing of rolled steel plates. An application to modify the source was received by the Office of Air Quality (OAQ) on January 30, 2004. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification is as follows:

- (a) Increase the estimated maximum throughput capacity of the 120 " line (pickling and shotblasting operation) from 4 tons per hour to 30 tons per hour.
- (b) Utilize the following stack test data, approved by IDEM, for the 120 " line (pickling and shotblasting operation) for emission calculation purposes:
  - (1) PM emission factor of 0.25 lb/ton of metal processed for pickling line;
  - (2) PM 10 emission factor of 2.0 lb/ton of metal processed for pickling line;
  - (3) NO<sub>x</sub> emission factor of 3.0 lb/ton of metal processed for pickling line;
  - (4) Hydrogen Fluoride (HF) emission factor of 1.0 lb/ton of metal processed for pickling line;
  - (5) PM/PM 10 emission factor of 0.1 lb/ton of metal processed for shotblasting process; and
  - (6) Use 0.0 percent scrubber removal efficiency for 120" line pickling for particulate control.
- (c) limit the annual throughput capacity to 166,000 tons of metal in 120 " line pickling.

The changes made in the Part 70 Operating Permit are presented in the attached Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. A complete copy of the modified permit is attached.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Rajesh Thotakura, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3216, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
RT / EVP

c: File - Henry County  
U.S. EPA, Region V  
Henry County Health Department  
Air Compliance Section Inspector – D.J. Knotts  
Compliance Data Section - Karen Ampil  
Administrative and Development  
Technical Support and Modeling - Michele Boner



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## **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

### **Outokumpu Stainless, Inc., Plate Products 549 West State Road 38 New Castle, IN 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.

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 and 326 IAC 2-1-3.2 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.: T065-7398-00003	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 15, 1999 Expiration Date: June 15, 2004
First Administrative Amendment No.: AA 065-14117-00003	Date Issued: April 10, 2001
First Permit Reopening No.:065-13316-00003	Date Issued: November 12, 2001
First Significant Permit Modification: SPM 065-18614-00003	Pages Affected:3, 4, 5, 30, 33, 34, 35 and 45
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 17, 2004

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**Stratospheric Ozone Protection**

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- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

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

- D.2.5 Visible Emissions Notations



## 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)]

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The Permittee owns and operates a stationary rolled steel plate manufacturing plant.

Responsible Official: Vice President of Operations  
Source Address: 549 West State Road 38, New Castle, IN 47362  
Mailing Address: P.O. Box 370, 549 West State Road 38, New Castle, IN 47362  
SIC Code: 3312  
County Location: Henry County  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source under PSD  
Major Source, Section 112 of the Clean Air Act

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

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

- (a) - One (1) Shotblasting - Wheelabrator, with a maximum capacity of five and fourteen hundredths (5.14) tons per hour, using a baghouse as control device, and exhausting to stack B.
  - One (1) 120" line shotblast, with a maximum capacity of thirty (30) tons per hour, using a baghouse as control device, and exhausting to stack C.
  - One (1) Batch pickling, with a maximum capacity of five and twenty-five hundredths (5.25) tons per hour and exhausting inside the source.
- (b) - One (1) 120" line pickling, with a maximum capacity of thirty (30) tons per hour, with an optional wet scrubber as control device, and exhausting to stack E.
- (c) - One (1) 120" line natural gas fired boiler, rated at ten and four hundredths (10.04) million British thermal units per hour and exhausting to stack S-5.
- (d) - One (1) walking beam natural gas fired reheat furnace, rated at twenty-one (21) million British thermal units per hour and exhausting inside the source.
  - One (1) slab mill natural gas fired reheat furnace-1, rated at forty-three and three tenths (43.30) million British thermal units per hour and exhausting to stack S-1.
  - One (1) slab mill natural gas fired reheat furnace-2, rated at fifty-one and fifty-eight hundredths (51.58) million British thermal units per hour and exhausting inside the source.
  - One (1) Salem natural gas fired annealing furnace-1, rated at thirty-two (32) million British thermal units per hour and exhausting inside the source.

- One (1) Salem natural gas fired annealing furnace-2, rated at thirty-two (32) million British thermal units per hour and exhausting inside the source.
- One (1) Heppenstall natural gas fired annealing furnace, rated at ten and eight tenths (10.80) million British thermal units per hour and exhausting inside the source.
- One (1) 120" line natural gas fired annealing furnace, rated at thirty-nine and six tenths (39.60) million British thermal units per hour and exhausting inside the source.
- One Finish Mill natural gas reheat furnace-1, rated at nine and three tenths (9.3) million British thermal units per hour and exhausting to stack S-2.
- One Finish Mill natural gas reheat furnace-2, rated at nine and three tenths (9.3) million British thermal units per hour and exhausting to stack S-3.
- One (1) finish mill hot rolling, with a maximum capacity of two and sixty-three hundredths (2.63) tons per hour and exhausting inside the source.
- One (1) slab mill hot rolling, with a maximum capacity of four and fifty-seven hundredths (4.57) tons per hour and exhausting inside the source.

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

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

- a) Batch natural gas pickling boiler with a maximum firing rate of 5.33 MMBtu/hr (Installed in 1979).
- b) One lime storage silo, maximum process throughput of 0.25 tons per hour, exhausting to a bin vent.
- c) Manufacturing activities such as, brazing equipment, cutting torches, soldering equipment, welding operations.
- d) Wastewater treatment activities.
- e) Combustion source flame safety purging on startup.
- f) A gasoline fuel transfer and dispensing operating handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- g) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- j) Refractory storage not requiring air pollution control equipment.
- j) Machining where an aqueous cutting coolant continuously floods the machining interface.
- k) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- l) Cleaners and solvents characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
  - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents

combined does not exceed 145 gallons per 12 months.

- m) Rolling oil recovery system.
- n) Quenching operations used with heat treating processes.
- o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- p) Paved and unpaved roads and parking lots with public access.
- q) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- r) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

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

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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 Permit No Defense [326 IAC 2-1-10] [IC 13]**

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### **B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3 Permit Term [326 IAC 2-7-5(2)]**

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### **B.4 Enforceability [326 IAC 2-7-7(a)]**

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

### **B.5 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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]**

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 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. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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 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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (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.12 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 prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any

limitation on emissions or potential to emit.

- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) 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 compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) 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,

including any term or condition from a previously issued construction or operation permit, 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.

- (d) 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.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 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 Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D

of this permit unless tied to an applicable rule or limit; or

- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 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]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (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.18 Permit Renewal [326 IAC 2-7-4]

- (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).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
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.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

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

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(I) 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.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

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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) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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), (c)(1), and (e)(2).

- (b) 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 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 increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(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.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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).
- (c) IDEM, OAQ, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 **Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- 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 Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period, as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2][326 IAC 9-1-2]**  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **Operation of Equipment [326 IAC 2-7-6(6)]**  
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 **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.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18][40 CFR 61.140]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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 emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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 that the inspector be accredited is federally enforceable.

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

**C.9 Performance Testing [326 IAC 3-6]**

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- (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 methods 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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

**C.10 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such requirements that become effective during the term of this permit.

**C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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).

**C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

- 
- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.13 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.14 Pressure Gauge Specifications**

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Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

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

**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in

effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
  - (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
    - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
    - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
    - (3) An automatic measurement was taken when the process was not operating; or
    - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
  - (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- C.18 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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not 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.19 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) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual 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.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be

recorded.

- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## **Stratospheric Ozone Protection**

### **C.23 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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)]:

- One (1) Shotblasting - Wheelabrator, with a maximum capacity of five and fourteen hundredths (5.14) tons per hour, using a baghouse as control device, and exhausting to stack B.
- One (1) 120" line shotblast, with a maximum capacity of thirty (30) tons per hour, using a baghouse as control device, and exhausting to stack C.
- One (1) Batch pickling, with a maximum capacity of five and twenty-five hundredths (5.25) tons per hour and exhausting inside the source.

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

#### D.1.1 Particulate [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2 (e) (Particulate Emissions Limitations for manufacturing Processes), the allowable particulate emission rate from the Shotblasting - Wheelabrator, 120" line shotblast, and Batch pickling, shall not exceed the pound per hour emission rate shown below in the table and established as E in the following formula:

The pounds per hour limitation was calculated with the following equation:

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

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

	Allowable Emission (E) (lb/hr) pounds per hour	Process weight rate (ton/hr) tons per hour
Shotblasting - Wheelabrator	12.27	5.14
120" line shotblast	40.04	30.00
Batch pickling	12.46	5.25

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

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

### Compliance Determination Requirements

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

Within 12 months after the issuance of this permit modification, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing for 120 " line shotblast utilizing the maximum capacity and methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C Performance Testing.

#### D.1.4 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the Shotblasting - Wheelabrator and the 120" line shotblast are in operation.

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

### **D.1.5 Visible Emissions Notations**

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- (a) Daily visible emission notations of the Shotblasting - Wheelabrator, 120" line shotblast, and Batch pickling stacks / vents exhaust shall be performed 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### **D.1.6 Parametric Monitoring**

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The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the Shotblasting - Wheelabrator and 120" line shotblast, at least once daily when the machines are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

### **D.1.7 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the Shotblasting - Wheelabrator and 120" line shotblast operations. All defective bags shall be replaced.

### **D.1.8 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. 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 single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

#### **D.1.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.5 the Permittee shall maintain records of daily visible emission notations of the 102" line shotblast stack exhaust.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
  - (1) Weekly records of the total static pressure drop during normal operation when venting to the atmosphere.
  - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.
- (d) To document compliance with Condition D.1.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

One (1) 120" line pickling, with a maximum capacity of thirty (30) tons per hour, with an optional wet scrubber as control device, and exhausting to stack E.

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

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emissions Limitations for Manufacturing Process), the allowable particulate emission rate from the 120" line pickling, shall not exceed 40.03 pounds per hour when operating at a process weight rate of thirty (30) tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

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

- a) The input of metal processed in 120" line pickling shall be less than 166000.00 tons per 12 consecutive month period with compliance determined at the end of each month.
- b) The NO<sub>x</sub> emissions rate from the 120 " line pickling shall not exceed 3 pounds per ton of material processed.

The throughput limit in conjunction with the NO<sub>x</sub> emission rate is required to limit the potential to emit of NO<sub>x</sub> to less than 249 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### D.2.3 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 this facility and its control device.

### Compliance Determination Requirements

#### D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 12 months after the issuance of this permit modification, in order to demonstrate compliance with Condition D.2.1 and D.2.2, the Permittee shall perform PM and NO<sub>x</sub> testing for 120 " line pickling utilizing the maximum capacity and methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C Performance Testing.

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

#### D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the 120" line pickling stack exhaust shall be performed 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

#### **D.2.6 Record Keeping Requirements**

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- (a) To document compliance with condition D.2.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with metal usage limits established in D.2.2.
  - (1) Calender dates covered in the compliance determination period;
  - (2) Actual metal usage since last compliance determination period; and
  - (3) NO<sub>x</sub> emission rates.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the 120" line pickling stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.2.7 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.2.2 shall be Submitted to the address listed in Section C- General Reporting Requirements, of this permit, using the reporting forms located at the end of the permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34)

### SECTION D.3

### FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:  
One (1) 120" line natural gas fired boiler, rated at ten and four hundredths (10.04) million British thermal units per hour and exhausting to stack S-5.

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

##### D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter (PM) emissions from the 10.04 MMBtu per hour heat input boiler shall be limited to 0.54 pounds per million British thermal units.

#### Compliance Determination Requirements

##### D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

##### D.3.3 Record Keeping Requirements

- (a) Pursuant to 326 IAC 12, and 40 CFR 60.48c (g), the Permittee shall record and maintain records of the amounts of fuel combusted during each day.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

##### D.3.4 Reporting Requirements

The Permittee shall certify, on the form provided, that natural gas was fired in the boilers at all times during the report period. This certification shall be included when submitting the Annual Compliance Certification Letter.

**SECTION D.4 FACILITY OPERATION CONDITIONS**

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

- One (1) walking beam natural gas fired reheat furnace, rated at twenty-one (21) million British thermal units per hour and exhausting inside the source.
- One (1) slab mill natural gas fired reheat furnace-1, rated at forty-three and three tenths (43.30) million British thermal units per hour and exhausting to stack S-1.
- One (1) slab mill natural gas fired reheat furnace-2, rated at fifty-one and fifty-eight hundredths (51.58) million British thermal units per hour and exhausting inside the source.
- One (1) Salem natural gas fired annealing furnace-1, rated at thirty-two (32) million British thermal units per hour and exhausting inside the source.
- One (1) Salem natural gas fired annealing furnace-2, rated at thirty-two (32) million British thermal units per hour and exhausting inside the source.
- One (1) Heppenstall natural gas fired annealing furnace, rated at ten and eight tenths (10.80) million British thermal units per hour and exhausting inside the source.
- One (1) 120" line natural gas fired annealing furnace, rated at thirty-nine and six tenths (39.60) million British thermal units per hour and exhausting inside the source.
- One (1) finish mill hot rolling, with a maximum capacity of two and sixty-three hundredths (2.63) tons per hour and exhausting inside the source. (1977)
- One (1) slab mill hot rolling, with a maximum capacity of four and fifty-seven hundredths (4.57) tons per hour and exhausting inside the source. (1947)

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

**D.4.1 Particulate Matter (PM) [326 IAC 6-3]**

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the finish mill hot rolling and the slab mill hot rolling shall not exceed allowable PM emission rate shown below in the table and established as E in the following equation:

Interpolation and extrapolation 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:

$$E = 4.10 P^{0.67}$$

hour; and where E = rate of emission in pounds per hour  
 P = process weight rate in tons per hour

	Rate of Emission (E) (lb/hr) pounds per hour	Process weight rate (ton/hr) tons per hour
Finish mill hot rolling	7.83	2.63
Slab mill hot rolling	11.34	4.57

**Compliance Determination Requirements**

**D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

There are no compliance monitoring requirements applicable to these facilities.

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

### **D.4.3 Reporting Requirements**

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The Permittee shall certify, on the form provided, that natural gas was fired in these combustion units at all times during the report period. This certification shall be included when submitting the Annual Compliance Certification Letter.

**SECTION D.5 FACILITY OPERATION CONDITIONS  
INSIGNIFICANT ACTIVITIES**

- Facility Description [326 IAC 2-7-5(15)]:
- Batch natural gas pickling boiler with a maximum firing rate of 5.33 MMBtu/hr (Installed in 1979).
  - One lime storage silo, maximum process throughput of 0.25 tons per hour, exhausting to a bin vent.
  - Manufacturing activities such as, brazing equipment, cutting torches, soldering equipment, welding operations.
  - Swing Grinders, Walk Behind Grinder, Belt Grinders, Plasma Torch Cutter, Shears.
  - Wastewater treatment activities.

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

**D.5.1 Particulate Matter (PM)**

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the natural gas fired 5.33 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

**D.5.2 Particulate Matter (PM) [326 IAC 6-3]**

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the above process weight activities 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

**Compliance Determination Requirement**

**D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 and D.5.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Outokumpu Stainless, Inc., Plate Products  
Source Address: 549 West State Road 38, New Castle, IN 47362  
Mailing Address: 549 West State Road 38, New Castle, IN 47362  
Part 70 Permit No.: T065-7398-00003

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

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

Source Name: Outokumpu Stainless, Inc., Plate Products  
Source Address: 549 West State Road 38, New Castle, IN 47362  
Mailing Address: 549 West State Road 38, New Castle, IN 47362  
Part 70 Permit No.: T065-7398-00003

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<input checked="" type="radio"/>	1. This is an emergency as defined in 326 IAC 2-7-1(12)
<input type="radio"/>	C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
<input type="radio"/>	C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input checked="" type="radio"/>	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
<input type="radio"/>	C The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: \_\_\_\_\_

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

**PART 70 OPERATING PERMIT  
NATURAL GAS FIRED BOILER AND FURNACE CERTIFICATION**

Source Name: Outokumpu Stainless, Inc., Plate Products  
Source Address: 549 West State Road 38, New Castle, IN 47362  
Mailing Address: 549 West State Road 38, New Castle, IN 47362  
Part 70 Permit No.: T065-7398-00003

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

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler or Furnace Affected

Alternate Fuel

Days burning alternate fuel

From

To


*(can omit boiler affected if only one gas boiler at this plant)*

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

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

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

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

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

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

Source Name: Outokumpu Stainless, Inc., Plate Products  
Source Address: 549 West State Road 38, New Castle, IN 47362  
Mailing Address: 549 West State Road 38, New Castle, IN 47362  
Part 70 Permit No.: T065-7398-00003

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

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. 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:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Outokumpu Stainless, Inc., Plate Products  
Source Address: 549 West State Road 38, New Castle, IN 47362  
Mailing Address: 549 West State Road 38, New Castle, IN 47362  
Part 70 Permit No.: T065-7398-00003  
Facility: 120" pickling line  
Parameter: Metal throughput rate at 120" pickling line  
Limit: Metal processed at 120" pickling line shall be less than 166,000.00 tons per 12 consecutive month period

YEAR: \_\_\_\_\_

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

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

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

Attach a signed certification to complete this report.

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

**Addendum to the  
Technical Support Document (TSD) for a Part 70 Significant Source  
Modification and Part 70 Significant Permit Modification**

**Source Background and Description**

<b>Source Name:</b>	Outokumpu Stainless, Inc., Plate Products
<b>Source Location:</b>	549 West State Road 38 New Castle, IN 47632
<b>County:</b>	Henry
<b>SIC Code:</b>	3312
<b>Operation Permit No.:</b>	T065-7398-00003
<b>Operation Permit Issuance Date:</b>	June 15, 1999
<b>Significant Source Modification No.:</b>	SSM 065-18458-00003
<b>Significant Permit Modification No.:</b>	SPM 065-18614-00003
<b>Permit Reviewer:</b>	RT / EVP

On May 11, 2004, the Office of Air Quality (OAQ) had a notice published in Courier Times in Newcastle, Indiana, stating that Outokumpu Stainless, Inc., Plate Products had applied for Part 70 significant source modification and Part 70 significant permit modification to increase the estimated maximum throughput capacity of the 120 " line pickling and shot blasting operation from 4 tons per hour to 30 tons per hour. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 9, 2004, OAQ received comments from Outokumpu Stainless, Inc., Plate Products through their environmental consultant.

The summary of the comments and related responses for the comments received from Outokumpu Stainless, Inc., Plate Products representative are presented. Any changes made to the permit as a result of the following comments are shown in bold and deleted permit language is shown with a line through it. Permit changes affecting the permit's Table of Contents are also revised without replication herein.

Comments Received from Outokumpu Stainless, Inc., Plate Products:

**Comment 1:**

Please remove the swing grinders from A.3(c) since the swing grinders are no longer at the source.

**Response 1:**

Swing grinders are removed from Condition A.3. The condition A.3 is changed as shown below.

A.3 Specifically Regulated and Nonregulated 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) Batch natural gas pickling boiler with a maximum firing rate of 5.33 MMBtu/hr (Installed in 1979).
- b) One lime storage silo, maximum process throughput of 0.25 tons per hour, exhausting to a bin vent.
- c) ~~Swing Grinders, Walk Behind Grinder, Belt Grinders, Plasma Torch Cutter, Shears.~~
- d) Manufacturing activities such as, brazing equipment, cutting torches, soldering equipment, welding operations.
- e) Wastewater treatment activities.
- f) Combustion source flame safety purging on startup.
- g) A gasoline fuel transfer and dispensing operating handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- h) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- i) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- j) Refractory storage not requiring air pollution control equipment.
- l. Machining where an aqueous cutting coolant continuously floods the machining interface.
- l) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- m) Cleaners and solvents characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
  - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- n) Rolling oil recovery system.
- o) Quenching operations used with heat treating processes.
- p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- q) Paved and unpaved roads and parking lots with public access.
- r) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

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

**Comment 2:**

In Section A.2 (b), please remove all mention of the wet scrubber controlling the 120-inch pickling line. Outokumpu will not be utilizing the wet scrubber to comply with any state or federal rule requirements. In addition, all emission factors provided to the IDEM were based on emissions prior to controls. Please remove the wet scrubber from the permit and technical support document (TSD) completely.

**Response 2:**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Since the wet scrubber is not required to comply with any state or federal regulations, IDEM determined that requirements for wet scrubber will be removed from the permit completely. However, the language saying an optional wet scrubber as control device will still be present in the description of the 120-inch pickling line unless the wet scrubber is physically removed from the source. The monitoring and recordkeeping requirements for the scrubber will be completely removed. The Condition A.2 is changed as shown below:

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

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

- (a) - One (1) Shotblasting - Wheelabrator, with a maximum capacity of five and fourteen hundredths (5.14) tons per hour, using a baghouse as control device, and exhausting to stack B.  
- One (1) 120" line shotblast, with a maximum capacity of thirty (30) tons per hour, using a baghouse as control device, and exhausting to stack C.  
- One (1) Batch pickling, with a maximum capacity of five and twenty-five hundredths (5.25) tons per hour and exhausting inside the source.
- (b) - One (1) 120" line pickling, with a maximum capacity of thirty (30) tons per hour, ~~using a~~ **with an optional** wet scrubber as control device, and exhausting to stack E.
- (c) - One (1) 120" line natural gas fired boiler, rated at ten and four hundredths (10.04) million British thermal units per hour and exhausting to stack S-5.
- (d) - One (1) walking beam natural gas fired reheat furnace, rated at twenty-one (21) million British thermal units per hour and exhausting inside the source.  
- One (1) slab mill natural gas fired reheat furnace-1, rated at forty-three and three tenths (43.30) million British thermal units per hour and exhausting to stack S-1.  
- One (1) slab mill natural gas fired reheat furnace-2, rated at fifty-one and fifty-eight hundredths (51.58) million British thermal units per hour and exhausting inside the source.

- One (1) Salem natural gas fired annealing furnace-1, rated at thirty-two (32) million British thermal units per hour and exhausting inside the source.
- One (1) Salem natural gas fired annealing furnace-2, rated at thirty-two (32) million British thermal units per hour and exhausting inside the source.
- One (1) Heppenstall natural gas fired annealing furnace, rated at ten and eight tenths (10.80) million British thermal units per hour and exhausting inside the source.
- One (1) 120" line natural gas fired annealing furnace, rated at thirty-nine and six tenths (39.60) million British thermal units per hour and exhausting inside the source.
- One Finish Mill natural gas reheat furnace-1, rated at nine and three tenths (9.3) million British thermal units per hour and exhausting to stack S-2.
- One Finish Mill natural gas reheat furnace-2, rated at nine and three tenths (9.3) million British thermal units per hour and exhausting to stack S-3.
- One (1) finish mill hot rolling, with a maximum capacity of two and sixty-three hundredths (2.63) tons per hour and exhausting inside the source.
- One (1) slab mill hot rolling, with a maximum capacity of four and fifty-seven hundredths (4.57) tons per hour and exhausting inside the source.

**Comment 3:**

In Section D.1.1 and the TSD, please insert parentheses in the process weight rate equation to reduce any confusion on how to perform the calculation. The equation should appear as follows:

$$E = (4.10) (P^{0.67})$$

In addition, when inserting the process weight of 30 tons per hour into the above-mentioned equation, an emission rate of 40.04 pounds per hour is obtained. Please update the existing 40.03 pounds per hour to read as 40.04 pounds per hour.

**Response 3:**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The parenthesis is added to the equation and emission rate is changed from 40.03 pounds per hour to 40.04 pounds per hour. The condition D.1.1 is changed as shown below:

**D.1.1 Particulate [326 IAC 6-3-2(e)]**

Pursuant to 326 IAC 6-3-2 (e) (Particulate Emissions Limitations for manufacturing Processes), the allowable particulate emission rate from the Shotblasting - Wheelabrator, 120" line shotblast, and Batch pickling, shall not exceed the pound per hour emission rate shown below in the table and established as E in the following formula:

The pounds per hour limitation was calculated with the following equation:

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

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

**Rate of Allowable Emission (E) Process weight rate**

	(lb/hr) pounds per hour	(ton/hr) tons per hour
Shotblasting - Wheelabrator	12.27	5.14
120" line shotblast	40.034	30.00
Batch pickling	12.46	5.25

**Comment 4:**

In Section D.1.3, please indicate that the testing will be completed utilizing stack testing USEPA Method 5 to demonstrate compliance with D.1.1.

**Response 4:**

IDEM has given the source flexibility to use the analysis methods of their choice for stack testing. The source has to identify the method that they will be utilizing for stack testing purpose, in the test protocol submitted to IDEM for approval before testing. Therefore, there will be no change in the condition due to this comment.

**Comment 5:**

Please add to D.1.5 (a) following the term "stacks" and/ or vents.

**Response 5:**

IDEM agrees with the source and the condition is changed as shown below:

D.1.5 Visible Emissions Notations

---

- (a) Daily visible emission notations of the Shotblasting - Wheelabrator, 120" line shotblast, and Batch pickling stacks / **vents** exhaust shall be performed 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

**Comment 6:**

In Section D.1.6, please revise the pressure drop range for the 120-inch line shot blast baghouse to 2-8 inches.

**Response 6:**

Based on the recent stack test for the 120-inch line shotblast, conducted on June 19, 2003, the pressure drop averaged 3.1 inch of water, with a range of 2.8 to 3.4 inches of water. Since the highest pressure drop is 3.4 inches of water, which is in the range 2-6 inches as stated in the condition D.1.6, there will be no change in the condition due to this comment.

**Comment 7:**

In Section D.1.9 (a)(1)(B), please remove the requirement to document compliance with the cleaning cycle: frequency and differential pressure. It is virtually impossible to document when the cleaning cycle will automatically turn on & off.

**Response 7:**

IDEM no longer requires this condition be included in the Part 70 permits. The recordkeeping conditions are updated to reflect the current Part 70 permit language. The Condition D.1.9 is changed as shown below:

**D.1.9 Record Keeping Requirements**

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- ~~(a) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
  - ~~(1) Daily records of the following operational parameters during normal operation:
    - ~~(A) Inlet and outlet differential static pressure; and~~
    - ~~(B) Cleaning cycle: frequency and differential pressure.~~~~
  - ~~(2) Documentation of all response steps implemented, per event.~~
  - ~~(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~
  - ~~(4) Quality Assurance/Quality Control (QA/QC) procedures.~~
  - ~~(5) Operator standard operating procedures (SOP).~~
  - ~~(6) Manufacturer's specifications or its equivalent.~~
  - ~~(7) Equipment "troubleshooting" contingency plan.~~~~
- ~~(b) To document compliance with Condition D.1.1, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7.~~
- ~~(c) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the Shotblasting - Wheelabrator, 120" line shotblast, and Batch pickling stacks exhaust.~~
- ~~(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~
- (a) To document compliance with Condition D.1.5 the Permittee shall maintain records of daily visible emission notations of the 102" line shotblast stack exhaust.**

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:**
  - (1) Weekly records of the total static pressure drop during normal operation when venting to the atmosphere.**
  - (2) Documentation of the dates vents are redirected.**
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.**
- (d) To document compliance with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

**Comment 8:**

In Section D.2, please remove all mention of the wet scrubber controlling the 120-inch pickling line. Outokumpu will not be utilizing the wet scrubber to comply with any state or federal rule requirements. In addition, all emission factors provided to the IDEM were based on emissions prior to controls. Please remove the wet scrubber from the permit and TSD completely.

**Response 8:**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Since the wet scrubber is not required to comply with any state or federal regulations, IDEM determined that requirements for wet scrubber will be removed from the permit completely. However, the language saying an optional wet scrubber as control device will still be present in the description of the 120-inch pickling line unless the wet scrubber is physically removed from the source. The monitoring and recordkeeping requirements for the scrubber will be completely removed.

**Comment 9:**

Please indicate that stack testing USEPA Method 5 will be used to demonstrate compliance with condition D.2.1.

**Response 9:**

IDEM has given the source flexibility to use the analysis methods of their choice for stack testing. The source has to identify the method that they will be utilizing for stack testing purpose, in the test protocol submitted to IDEM for approval before testing. Therefore, there will be no change in the condition due to this comment.

**Comment 10:**

Please remove Section D.2.5 requiring the wet scrubber be in operation at all times that the 120-inch pickling line is in operation. As discussed above, the wet scrubber is not needed to comply with any state or federal rule requirements. In addition, all emission factors provided to the IDEM were based on emissions prior to controls. Please remove the wet scrubber from the permit and TSD completely.

**Response 10:**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Since the wet scrubber is not required to comply with any state or federal regulations, IDEM has determined to remove condition D.2.5 from the permit. The changes to condition D.2.5 are shown below:

~~D.2.5 Particulate Matter (PM)~~

---

~~The wet scrubber for PM control shall be in operation at all times when the 120" line pickling is in operation.~~

**Comment 11:**

Please remove Section D.2.7 requiring parametric monitoring requirements for the wet scrubber utilized on the 120 inch pickling line. As discussed above, the wet scrubber is not needed to comply with any state or federal rule requirements. In addition, all emission factors provided to the IDEM were based on emissions prior to controls. Please remove the wet scrubber from the permit and TSD completely.

**Response 11:**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Since the wet scrubber is not required to comply with any state or federal regulations, IDEM has determined to remove condition D.2.7 from the permit. The changes to condition D.2.7 are shown below:

~~D.2.7 Parametric Monitoring~~

---

~~The Permittee shall monitor and record the total static pressure drop across the wet scrubber used in conjunction with the 120" line pickling process, the pH and flow rate of the scrubbing liquid, the percentage of nitric and hydrofluoric acid in the acid bath, temperature of the acid bath, at least once daily when the machine is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the wet scrubber shall be maintained within the range of 0.5 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~

~~\_\_\_\_\_ The instruments used for determining the acid content, pH, pressure drop, and flow rate shall comply with Section C – Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. If at any time the instruments used to measure the nitric and hydrofluoric content in the acid bath are not functioning properly, the pH of the acid bath shall be measured instead.~~

~~\_\_\_\_\_ An inspection of the scrubber shall be performed each calendar quarter and defective scrubber parts shall be replaced.~~

**Comment 12:**

Please remove Section D.2.8 requiring scrubber failure detection requirements for the wet scrubber utilized on the 120 inch pickling line. As discussed above, the wet scrubber is not needed to comply with any state or federal rule requirements. In addition, all emission factors provided to the IDEM were based on emissions prior to controls. Please remove the wet scrubber from the permit and TSD completely.

**Response 12:**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Since the wet scrubber is not required to comply with any state or federal regulations, IDEM has determined to remove condition D.2.8 from the permit. The changes to condition D.2.8 are shown below:

**D.2.8 – Failure Detection**

---

~~In the event that scrubber failure has been observed:~~

- ~~\_\_\_\_\_ (a) \_\_\_\_\_ The scrubber will be shut down immediately until the failure has been repaired or the affected parts replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. 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).~~

**Comment 13:**

Please remove Section D.2.9 (a) and D.2.9(b), requiring record keeping requirements for the wet scrubber utilized on the 120 inch pickling line. As discussed above, the wet scrubber is not needed to comply with any state or federal rule requirements. In addition, all emission factors provided to the IDEM were based on emissions prior to controls. Please remove the wet scrubber from the permit and TSD completely.

**Response 13:**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Since the wet scrubber is not required to comply with any state or federal regulations, IDEM has determined to remove condition D.2.9 (a) and D.2.9 (b) from the permit. The changes to condition D.2.9 are shown below:

**D.2.9 Record Keeping Requirements**

- ~~(a) To document compliance with Condition D.2.6 7, a record shall be kept of the results of the quarterly inspection and the number of scrubber parts replaced.~~
- ~~(b) To document compliance with Condition D.2.1 and D.2.6 7, the Permittee shall maintain the following:
  - ~~(1) Daily records of inlet and outlet differential static pressure during normal operation.~~
  - ~~(2) Documentation of all response steps implemented, per event.~~
  - ~~(3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.~~
  - ~~(4) Quality Assurance/Quality Control (QA/QC) procedures.~~
  - ~~(5) Operator standard operating procedures (SOP).~~
  - ~~(6) Manufacturer's specifications or its equivalent.~~
  - ~~(7) Equipment "troubleshooting" contingency plan.~~~~
- ~~(c) (a) To document compliance with Condition D.2.2 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with metal usage limits established in D.2.2
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual metal usage since last compliance determination period; and
  - (3) NO<sub>x</sub> emissions rates.~~
- ~~(c) (b) To document compliance with Condition D.2.6 5, the Permittee shall maintain records of daily visible emission notations of the 120" line pickling stack exhaust.~~
- ~~(c) (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

**Comment 14:**

Please identify the source as Outokumpu Stainless, Inc., Plate Products throughout the permit and TSD.

**Response 14:**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The source name is changed to Outokumpu Stainless, Inc., Plate Products throughout the permit.

**Comment 15:**

Please change the responsible official listed in the TSD on page 8 from Christopher A. Streit to Vice President of Operations.

**Response 15:**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

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

Technical Support Document (TSD) for a Significant Source Modification  
and Significant Permit Modification to a Part 70 Operating Permit

**Source Background and Description**

<b>Source Name:</b>	<b>Outokumpu Stainless, Inc.</b>
<b>Source Location:</b>	<b>549 West State Road 38 New Castle, IN 47632</b>
<b>County:</b>	<b>Henry</b>
<b>SIC Code:</b>	<b>3312</b>
<b>Operation Permit No.:</b>	<b>T065-7398-00003</b>
<b>Operation Permit Issuance Date:</b>	<b>June 15, 1999</b>
<b>Significant Source Modification No.:</b>	<b>SSM 065-18458-00003</b>
<b>Significant Permit Modification No.:</b>	<b>SPM 065-18614-00003</b>
<b>Permit Reviewer:</b>	<b>RT/EVP</b>

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

**History**

Outokumpu Stainless Inc., formerly known as Avesta Sheffield Plate, Inc. was issued Part 70 operating permit T065-7398-00003 on June 15, 1999. On January 30, 2004, Outokumpu Stainless Inc. submitted an application to OAQ to modify their existing operation by increasing the estimated maximum throughput capacity of 120 " line (i.e. pickling and shotblasting operation) from 4 tons per hour to 30 tons per hour.

**Explanation of Modification Requested**

On January 30, 2004, Outokumpu Stainless Inc. submitted a request to:

- (a) Increase the estimated maximum throughput capacity of the 120 " line (pickling and shotblasting operation) from 4 tons per hour to 30 tons per hour.
- (b) Utilize the following stack test data, approved by IDEM, for the 120 " line (pickling and shotblasting operation) for emission calculation purposes:
  - (1) PM emission factor of 0.25 lb/ton of metal processed for pickling line;
  - (2) PM 10 emission factor of 2.0 lb/ton of metal processed for pickling line;
  - (3) NO<sub>x</sub> emission factor of 3.0 lb/ton of metal processed for pickling line;
  - (4) Hydrogen Fluoride (HF) emission factor of 1.0 lb/ton of metal processed for pickling line;
  - (5) PM/PM 10 emission factor of 0.1 lb/ton of metal processed for shotblasting process; and
  - (6) Use 0.0 percent scrubber removal efficiency for 120" line pickling for particulate control
- (c) limit the annual throughput capacity to 166,000 tons of metal in 120 " line pickling.

The Permittee has conducted a compliance stack test on 120" line (pickling and shotblasting operation) on June 19, 2003 and IDEM approved the test results on December 1, 2003. Based on the discovery during the testing, the estimated maximum throughput capacity of 120" line should be increased from 4 tons per hour to 30 tons per hour.

The potential emissions from the 120" line (pickling and shotblasting operation) are calculated utilizing the emission factors obtained in the recently conducted compliance test. The potential NO<sub>x</sub> emissions from the pickling line, based on the increased maximum throughput of 30 tons per hour, are 394 tons per year. To render PSD not applicable, the source is willing to limit NO<sub>x</sub> emission rate to less than 3 pounds per ton of metal processed and limit their annual throughput capacity to 166,000 tons of metal, from 120 " line pickling. The throughput limit in conjunction with NO<sub>x</sub> emission rate will limit the NO<sub>x</sub> emissions to less than 249 tons per year from 120 " line pickling and compliance with this limit will render PSD not applicable.

Currently, the existing source is not a major PSD stationary source because the source criteria pollutant emissions, after all applicable limits and standards, are less than or limited to less than the respective major source levels of 250 tons per year. As a result of this modification, the NO<sub>x</sub> emissions from line pickling are 249 tons per year. After this modification, the entire source NO<sub>x</sub> emissions will be 390.51 tons per year. The source, which is currently a minor PSD source, will be reclassified as major source for PSD applicability with this approval.

### Existing Approvals

The source was issued a Part 70 Operating Permit (T065-7398-00003) on June 15, 1999. The source has since then received the following:

- (a) First administrative amendment no.: AA065-14117-00003, issued on April 10, 2001; and
- (b) First reopening no.: R065-13316-00003, issued on November 12, 2001.

### Enforcement Issue

There are no enforcement actions with the equipment proposed in the modification.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (inches)	Flow Rate (acfm)	Temperature (°F)
C	120" line Shotblast	N/A	23	9600	ambient
E	120" line Pickling	N/A	22	4500	140

### Recommendation

The staff recommends to the Commissioner that the Significant Source Modification and Significant Permit Modification 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 January 30, 2004. Additional information was received on March 17, 2004.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (One (1) page).

## Potential to Emit Before Controls for the Modification

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

This table reflects the PTE before controls due to the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	45.99
PM-10	275.94
SO <sub>2</sub>	-
VOC	-
CO	-
NO <sub>x</sub>	394.20

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

HAPs	Potential To Emit (tons/year)
Worst Case Single HAP	131.40
Combined HAPs	131.40

## Justification for Modification

The Part 70 operating permit is being modified through both Part 70 Significant Source Modification and Significant Permit Modification. The source is increasing the maximum throughput capacity of 120" line (Pickling and shotblasting operation) from 4 tons to 30 tons per hour. This increase will result in the increase of potential emissions of criteria pollutants from 120" line and will change the source status to major for PSD. Though there are no physical changes to the 120" line, the change in the source status from minor PSD source to major PSD source will classify this modification as major source modification, pursuant to 2-7-10.5 (f) (4). The source is taking a material throughput limit on 120" line pickling operation, to limit NO<sub>x</sub> emissions to less than 249 tons per year and render PSD not applicable. Therefore, pursuant to 326 IAC 2-7-12(d), this modification request is reviewed as significant permit modification.

### County Attainment Status

The source is located in Henry County.

Pollutant	Status
PM <sub>10</sub>	attainment or unclassifiable
SO <sub>2</sub>	attainment or unclassifiable
NO <sub>2</sub>	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Henry County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.
- (b) Henry County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects calendar year 2002 emissions, based upon the Indiana Air Emission Summary Data for criteria pollutants.

Pollutant	Emissions (ton/yr)
PM	37.6
PM10	37.6
SO <sub>2</sub>	0.08
VOC	0.74
CO	10.54
NO <sub>x</sub>	62.83

### Existing Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM10 (tons/yr)	SO <sub>2</sub> (tons/yr)	NO <sub>x</sub> (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	223.49	108.29	0.63	166.81	8.64	93.14	18.6	23.25

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	10/25

- (a) This existing source is not a major PSD stationary source because the source criteria pollutant emissions, after all applicable limits and standards, are less than or limited to less than the respective major source levels of 250 tons per year, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the application and technical supporting document for Part 70 permit T065-7398-00003, issued on June 15, 1999.

### Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	HAPs
Existing 120" line Shotblast <sup>(1)</sup>	45.5	29.75	0.00	0.00	0.00	0.00	0.00
Existing 120" line Pickling <sup>(1)</sup>	23.9	23.9	0.00	25.33	0.00	0.00	18.6
Modified 120" line shotblast <sup>(2)</sup>	13.14	13.14	0.00	0.00	0.00	0.00	0.00
Modified 120" line Pickling <sup>(2)</sup>	20.75	166.00	0.00	249.00	0.00	0.00	83.00
Total Emissions <sup>(3)</sup>	- 35.51	125.49	0.00	223.7	0.00	0.00	64.4

- (1) These are the existing emissions from 120" shotblast and pickling line, i.e. for metal processed throughput rate of 4 tons of metal processed, using the initial emission factors.
- (2) These are the 120" shotblast and pickling line emissions resulting from the modification, i.e. increasing the metal processed throughput rate from 4 tons to 30 tons, using the recently tested emissions factors.
- (3) The total reflects the net emissions change from 120" shotblast and pickling line after modification.

This modification to an existing major stationary source is not a major PSD modification because the modification will limit NO<sub>x</sub> emissions from 120" line pickling to less than 249 tons per year.

**Emissions After the Modification**

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	187.98	233.78	0.63	390.51	8.64	93.14	83.00	87.65

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	10/25

This source after the proposed modification is a major PSD stationary source because the NO<sub>x</sub> emissions are greater than 250 tons per year.

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.
- (b) This modification is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart CCC, National Emission Standards for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants because the source does not use hydrochloric acid for pickling stainless steel plates.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this modification.
- (d) 40 CFR 64, Compliance Assurance Monitoring

The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

- (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
- (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
- (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source was issued initial Part 70 permit no. T065-7398-00003, on June 15, 1999. The PSEU as 120 " line shotblasting has no emission limitations, does not use a control device and has uncontrolled PTE less than 100 percent of the applicable major Part 70 threshold. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to the proposed modification at shotblasting line.

The PSEU as 120 " line pickling has emission limitation, and has uncontrolled PTE greater than 100 percent of the applicable major part 70 threshold. However, the 120 " line pickling does not use a control device to comply with the emission limitation (i.e. the source uses a combination of throughput limitation and NO<sub>x</sub> emissions rate to comply). Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to the proposed modification at 120 " line pickling.

### **State Rule Applicability - Entire Source and Individual Facilities**

#### **326 IAC 2-2 (PSD Minor Limit)**

The source has always been a minor source for PSD applicability. The increase in the throughput capacity of 120" line from 4 tons to 30 tons per hour is major because the potential to emit NO<sub>x</sub> is greater than 250 tons per year. However, the source is taking a throughput limit of 166,000.00 tons per year of metal processed and NO<sub>x</sub> emission rate limit of 3 pounds per ton of material processed, from 120" line pickling. This throughput limit in conjunction with NO<sub>x</sub> emission rate will limit the potential to emit of NO<sub>x</sub> to less than 249 tons per 12 consecutive month period from the 120" line pickling and compliance with this limit renders PSD not applicable. The source will become a major stationary source after the increase because the potential to emit of NO<sub>x</sub> from the source will be greater than 250 tons per year.

The increase in the metal processing at 120 " line pickling will not increase the utilization at other units because this is a stand alone unit. After the pickling operation, the stainless steel plates are packed and shipped offsite.

### **Testing Requirements**

#### **326 IAC 2-7-6(1), (6) (Testing Requirements)**

- (a) Within 12 months after the issuance of this permit modification, in order to demonstrate compliance with 326 IAC 6-3-2 (e), the Permittee shall perform PM testing for 120 " line shotblast utilizing the maximum capacity and methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C Performance Testing.
- (b) Within 12 months after the issuance of this permit modification, in order to demonstrate compliance with 326 IAC 6-3-2 (e) and 326 IAC-2-2, the Permittee shall perform PM and NO<sub>x</sub> testing for 120 " line pickling utilizing the maximum capacity and methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C Performance Testing.

\*\* Note: Compliance section determined that testing is required within 12 months.

### **Compliance Requirements**

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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 current compliance monitoring requirements in sections D.1 and D.2 of the Part 70 permit do not change as a result of this modification.

### Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit (T065-7398-00003), issued June 15, 1999:

1. Section A.1 (General Information) and A.2 (Emission Units and Pollution Control Equipment Summary) is revised to reflect the increase of maximum capacity of 120 " line from four (4) to thirty (30) for this modification, as follows:

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

The Permittee owns and operates a stationary rolled steel plate manufacturing plant.

Responsible Official: Christopher A. Streit  
Source Address: 549 West State Road 38, New Castle, IN 47362  
Mailing Address: P.O. Box 370, 549 West State Road 38, New Castle, IN 47362  
SIC Code: 3312  
County Location: Henry County  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
~~Minor~~ **Major** Source under PSD  
Major Source, Section 112 of the Clean Air Act

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

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

- (a) - One (1) Shotblasting - Wheelabrator, with a maximum capacity of five and fourteen hundredths (5.14) tons per hour, using a baghouse as control device, and exhausting to stack B.  
- One (1) 120" line shotblast, with a maximum capacity of ~~four (4)~~ **thirty (30)** tons per hour, using a baghouse as control device, and exhausting to stack C.  
- One (1) Batch pickling, with a maximum capacity of five and twenty-five hundredths (5.25) tons per hour and exhausting inside the source.
- (b) - One (1) 120" line pickling, with a maximum capacity of ~~four (4)~~ **thirty (30)** tons per hour, using a wet scrubber as control device, and exhausting to stack E.
- (c) - One (1) 120" line natural gas fired boiler, rated at ten and four hundredths (10.04) million British thermal units per hour and exhausting to stack S-5.

- (d)
- One (1) walking beam natural gas fired reheat furnace, rated at twenty-one (21) million British thermal units per hour and exhausting inside the source.
  - One (1) slab mill natural gas fired reheat furnace-1, rated at forty-three and three tenths (43.30) million British thermal units per hour and exhausting to stack S-1.
  - One (1) slab mill natural gas fired reheat furnace-2, rated at fifty-one and fifty-eight hundredths (51.58) million British thermal units per hour and exhausting inside the source.
  - One (1) Salem natural gas fired annealing furnace-1, rated at thirty-two (32) million British thermal units per hour and exhausting inside the source.
  - One (1) Salem natural gas fired annealing furnace-2, rated at thirty-two (32) million British thermal units per hour and exhausting inside the source.
  - One (1) Heppenstall natural gas fired annealing furnace, rated at ten and eight tenths (10.80) million British thermal units per hour and exhausting inside the source.
- 
- One (1) 120" line natural gas fired annealing furnace, rated at thirty-nine and six tenths (39.60) million British thermal units per hour and exhausting inside the source.
  - One Finish Mill natural gas reheat furnace-1, rated at nine and three tenths (9.3) million British thermal units per hour and exhausting to stack S-2.
  - One Finish Mill natural gas reheat furnace-2, rated at nine and three tenths (9.3) million British thermal units per hour and exhausting to stack S-3.
  - One (1) finish mill hot rolling, with a maximum capacity of two and sixty-three hundredths (2.63) tons per hour and exhausting inside the source.
  - One (1) slab mill hot rolling, with a maximum capacity of four and fifty-seven hundredths (4.57) tons per hour and exhausting inside the source.
2. Section D.1 conditions (facility description and operating conditions) are revised to reflect the increase of maximum capacity of 120 " line from four (4) to thirty (30) for this modification, as follows:

#### SECTION D.1

#### FACILITY OPERATION CONDITIONS

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

- (a) One (1) Shotblasting - Wheelabrator, with a maximum capacity of five and fourteen hundredths (5.14) tons per hour, using a baghouse as control device, and exhausting to stack B.
- (b) One (1) 120" line shotblast, with a maximum capacity of ~~four (4)~~ **thirty (30)** tons per hour, using a baghouse as control device, and exhausting to stack C.
- (c) One (1) Batch pickling, with a maximum capacity of five and twenty-five hundredths (5.25) tons per hour and exhausting inside the source.

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

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

**Pursuant to 326 IAC 6-3-2(e) (Particulate Emissions Limitations for Manufacturing Process), the PM allowable particulate emission rate** from the Shotblasting - Wheelabrator, 120" line shotblast, and Batch pickling, shall not exceed the pound per hour emission rate shown below in the table and established as E in the following formula:

**The pounds per hour limitation was calculated with the following equation:**

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

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

$$P = \text{process weight rate in tons per hour}$$

	Rate of Emission (E) (lb/hr) pounds per hour	Process weight rate (ton/hr) tons per hour
Shotblasting - Wheelabrator	12.27	5.14
120" line shotblast	<del>40.38</del> <b>40.03</b>	<del>4.00</del> <b>30</b>
Batch pickling	12.46	5.25

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

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C- Performance Testing.~~

**Within 12 months after the issuance of this permit modification, in order to demonstrate compliance with 326 IAC 6-3-2 (e) and 326 IAC-2-2, the Permittee shall perform PM testing for 120 " line shotblast utilizing the maximum capacity and methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C Performance Testing.**

- The increase in the maximum capacity of 120 " line pickling from four (4) to thirty (30) results in the increase of NO<sub>x</sub> emissions greater than 250 tons per year and the emissions of all other criteria pollutants remain less than 250 tons per year. Hence a new condition is added to keep NO<sub>x</sub> emissions less than 250 tons per year to render PSD not applicable. Section D.2 conditions (facility description and operating conditions) are revised to reflect the increase as follows:

**SECTION D.2 FACILITY OPERATION CONDITIONS**

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

One (1) 120" line pickling, with a maximum capacity of ~~four (4)~~ **thirty (30)** tons per hour, using a wet scrubber as control device, and exhausting to stack E.

**(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 Matter (PM) [326 IAC 6-3-2(e)]

**Pursuant to 326 IAC 6-3-2(e) (Particulate Emissions Limitations for Manufacturing Process), the PM allowable particulate emission rate from the 120" line pickling, shall not exceed ~~40.38~~ **40.03** pounds per hour when operating at a process weight rate of ~~four (4)~~ **thirty (30)** tons per hour.**

**The pounds per hour limitation was calculated with the following equation:**

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

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

$$P = \text{process weight rate in tons per hour}$$

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

- (a) **The input of metal processed in 120" line pickling shall be less than 166000.00 tons per 12 consecutive month period with compliance determined at the end of each month.**
- (b) **The NO<sub>x</sub> emissions rate from the 120 " line pickling shall not exceed 3 pounds per ton of material processed.**

**The throughput limit in conjunction with the NO<sub>x</sub> emission rate is required to limit the potential to emit of NO<sub>x</sub> to less than 249 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.**

D.2.22.3 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 this facility and its control device.

**Compliance Determination Requirements**

D.2.32.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C- Performance Testing.~~

**Within 12 months after the issuance of this permit modification, in order to demonstrate compliance with 326 IAC 6-3-2 (e) and 326 IAC-2-2, the Permittee shall perform PM and NO<sub>x</sub> testing for 120 " line pickling utilizing the maximum capacity and methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C Performance Testing.**

D.2.42.5 Particulate Matter (PM)

The wet scrubber for PM control shall be in operation at all times when the 120" line pickling is in operation.

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

D.2.52.6 Visible Emissions Notations

- (a) Daily visible emission notations of the 120" line pickling stack exhaust shall be performed 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.2.62.7 Parametric Monitoring

The Permittee shall monitor and record the total static pressure drop across the wet scrubber used in conjunction with the 120" line pickling process, the pH and flow rate of the scrubbing liquid, the percentage of nitric and hydrofluoric acid in the acid bath, temperature of the acid bath, at least once daily when the machine is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the wet scrubber shall be maintained within the range of 0.5 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instruments used for determining the acid content, pH, pressure drop, and flow rate shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. If at any time the instruments used to measure the nitric and hydrofluoric content in the acid bath are not functioning properly, the pH of the acid bath shall be measured instead.

An inspection of the scrubber shall be performed each calendar quarter and defective scrubber parts shall be replaced.

#### D.2.72.8 Failure Detection

In the event that scrubber failure has been observed:

- (a) The scrubber will be shut down immediately until the failure has been repaired or the affected parts replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

#### D.2.82.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6 7, a record shall be kept of the results of the quarterly inspection and the number of scrubber parts replaced.
- (b) To document compliance with Condition D.2.1 and D.2.6 7, the Permittee shall maintain the following:
  - (1) Daily records of inlet and outlet differential static pressure during normal operation.
  - (2) Documentation of all response steps implemented, per event.
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.

- (7) Equipment "troubleshooting" contingency plan.
- (c) **To document compliance with Condition D.2.2 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with metal usage limits established in D.2.2**
- (1) **Calendar dates covered in the compliance determination period;**
- (2) **Actual metal usage since last compliance determination period; and**
- (3) **NO<sub>x</sub> emissions rates.**
- (d) To document compliance with Condition D.2.5 6, the Permittee shall maintain records of daily visible emission notations of the 120" line pickling stack exhaust.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.2.10 Reporting Requirements**

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**A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

4. The Table of Contents shall be modified to reflect the conditions that have been added.
5. The quarterly reporting form is added.

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

**Part 70 Quarterly Report**

**Source Name:** Outokumpu Stainless, Inc.  
**Source Address:** 549 West State Road 38, New Castle, IN 47362  
**Mailing Address:** 549 West State Road 38, New Castle, IN 47362  
**Part 70 Permit No.:** T065-7398-00003  
**Facility:** 120" pickling line  
**Parameter:** Metal throughput rate at 120" pickling line  
**Limit:** Metal Processed at 120" pickling line shall be less than 166,000.00 tons per 12 consecutive month period

**YEAR:**

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

**No deviation occurred in this month.**

**Deviation/s occurred in this month.**

**Deviation has been reported on:**

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

**Attach a signed certification to complete this report.**

## **Conclusion**

The operation manufacturing rolled steel plates shall be subject to the conditions of the attached proposed Significant Source Modification No. 065-18458-00003 and Significant Permit Modification No. 065-18614-00003.

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

**Company Name:** Outokumpu Stainless, Inc.  
**Address City IN Zip:** 549 West State Road 38  
**Significant Source Modification No.:** SSM 065-18458-00003  
**Significant Permit Modification No.:** SPM 065-18614-00003  
**Reviewer:** RT/EVP  
**Date:** 03-23-04

Emission Unit	Maximum Capacity	Emission Factor	Emission Factor (lb/ton)	Source of Emission Factor	Control Efficiency %	Capture Efficiency %	Potential Emissions After Controls						
							PM (Tons/Year)	PM10 (Tons/Year)	SOx (Tons/Year)	NOx (Tons/Year)	VOC (Tons/Year)	CO (Tons/Year)	HF (Tons/Year)
120" Line Shot Blast	<b>262,800.00</b> (tons/year)	PM	0.1	2003 Stack Test	All Ready Accounted For	All Ready Accounted For	13.14	13.14	0.00	0.00	0.00	0.00	0.00
Emission Factor = lb/ton		PM10	0.1	2003 Stack Test									
120" Pickling Line	<b>166,000.00</b> (tons/year)	PM	0.25	2003 Stack Test	0	0	20.75	166.00	0.00	249.00	0.00	0.00	83.00
		PM10	2.00	2003 Stack Test	0	0							
		NOx	3.00	2003 Stack Test	0	0							
		HF	1.00	2003 Stack Test	0	0							
<b>Total Potential Emissions After Controls (tons/year)</b>							<b>33.89</b>	<b>179.14</b>	<b>0.00</b>	<b>249.00</b>	<b>0.00</b>	<b>0.00</b>	<b>83.00</b>

Note 1: The 2003 stack test that was performed on the outlet of the baghouse controlling the 120" Line Shotblast measured average PM emissions at 0.0069 lb/ton metal. Outokumpu has included a safety factor in this average emission rate to derive the PM/PM10 emission factor depicted above.

Note 2: The 2003 stack test that was performed on the inlet of the wet scrubber controlling the 120" Line Pickling Operation measured average PM/PM10 emissions at 1.7252 lb/ton metal, NOx emissions at 2.3575 lb/ton metal and HF emissions at 0.5529 lb/ton metal. Outokumpu has included a safety factor in this average emission rate to derive the PM/PM10 emission factor depicted above.