

June 22, 2005

Mr. Kevin Young  
CSN, LLC  
455 West Industrial Drive  
Terre Haute, Indiana 47802

Re: Permit No.: 167-18865  
First Significant Permit Modification to  
Part 70 Permit No.: T167-12516-00120

Dear Mr. Young:

CSN, LLC was issued a permit on June 24, 2003 for a stationary steel processing plant. A letter requesting changes to this permit was received on March 29, 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 consists of changes to testing requirements, adds a quarterly reporting requirement, and updates the Part 70 Permit to reflect current language.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit to the front of the original permit.

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 Mr. Scott Sines, 103 South 3<sup>rd</sup> Street, Terre Haute, Indiana 47807, or call at (812) 462-3433.

Sincerely,

ORIGINAL SIGNED BY

George M. Needham  
Director  
Vigo County Air Pollution Control

Attachments

sbs

cc: Mindy Hahn, IDEM  
Winter Bottum, IDEM

**PART 70 OPERATING PERMIT**

**OFFICE OF AIR QUALITY**  
**And**  
**VIGO COUNTY AIR POLLUTION CONTROL**

**Companhia Siderugica Nacional, LLC**  
**(CSN, LLC)**  
**455 West Industrial Drive**  
**Terre Haute, Indiana 47802**

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

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

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

Operation Permit No.: T167-12516-00120	
Original Signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 24, 2003  Expiration Date: June 24, 2008
First Administrative Amendment 167-20150 issued December 21, 2004	Pages Affected: 24-27
First Significant Permit Modification 167- 18865	Pages Affected: 28 – 29, 38 – 39, 46 (added)
Issued By: ORIGINAL SIGNED BY George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: June 22, 2005

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**Stratospheric Ozone Protection**

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## SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary steel processing plant.

Responsible Official:	Vice President - Operations
Source Address:	455 West Industrial Drive, Terre Haute, Indiana 47802
Mailing Address:	455 West industrial Drive, Terre Haute, Indiana 47802
General Source Phone Number:	(812) 299-4157
SIC Code:	3316
County Location:	Vigo County
Source Location Status:	Basic nonattainment for ozone under the 8-hour standard Maintenance Attainment for Sulfur Dioxide (SO <sub>2</sub> ) Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories (Nested)

### 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:

1. Galvanizing Line, identified as GAL-1, with a maximum capacity of 140,000 pounds of steel per hour consisting of the following equipment (Note: a portion of this line may be used as a continuous annealing line instead of galvanizing only):
  - a) Galvanizing Line Strip Dryer Furnace, identified as GL-01, with a maximum capacity of 2.0 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO<sub>x</sub> burners for control, and exhausting to the building interior.
  - b) Galvanizing Line Direct Fire Zone Furnace, identified as GL-02, with a maximum capacity of 45.3 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO<sub>x</sub> burners for control, and exhausting to stack 002.
  - c) Galvanizing Line Radiant Heat Tube Furnace, identified as GL-03, with a maximum capacity of 13.2 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO<sub>x</sub> burners for control, and exhausting to stack 003.
  - d) Galvanizing Line Chromate Spray Dryer Furnace, identified as GL-04, with a maximum capacity of 2.0 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO<sub>x</sub> burners for control, and exhausting to the building interior.
  - e) Galvanizing Line Spray Cleaning section with a brush scrubber and strip rinse, identified as GL-05, utilizing hot alkali solution, using mist elimination for control, and exhausting to stack 006.
  - f) Galvanizing Line Zinc Induction Melting section, identified as GL-06, with a maximum zinc melt capacity of 10,200 pounds per hour, using no control, and exhausting to the building interior.
  - g) Galvanizing Line Temper Mill, identified as GL-07, utilizing a detergent as the rolling fluid, using no

- control, and exhausting to the building interior.
- h) Galvanizing Line Chromate Spray section, identified as GL-08, utilizing chromic acid, using no control, and exhausting to the building interior.
2. Three (3) Package Boilers, identified as PB-1 through PB-3, with a maximum capacity of 33.48 million BTU per hour each, primarily fired on natural gas but with propane backup, using low NO<sub>x</sub> burners for control, and exhausting to stacks 005A, 005B, and 005C respectively.
  3. Pickle Line, identified as PL-1, with a maximum capacity of 800,000 pounds of steel per hour, utilizing Hydrochloric Acid as the pickling liquor, consisting of the following equipment:
    - a) Four (4) pickle tanks, identified as pickle tank #1 through pickle tank #4, with a maximum capacity of 5,200 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
    - b) One(1) five-chamber cascading re-circulating rinse tank, identified as rinse tank #1, with a maximum capacity of 3,800 gallons, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
    - c) Strip Dryer, identified as PL-dryer, with a maximum capacity of 5,900 scfm of air heated in the package boilers, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
    - d) Two (2) fresh acid storage tanks, identified as Tank #1 and Tank #2, with a maximum capacity of 24,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
    - e) Four (4) pickle liquor re-circulation tanks, identified as Tank #3 through Tank #6, with a maximum capacity of 12,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
    - f) Spent rinse water storage tank, identified as Tank #9, with a maximum capacity of 12,000 gallons, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
    - g) Two (2) spent liquor storage tanks, identified as Tank #7 and #8, with a maximum capacity of 24,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
    - h) Electrostatic Oiler, identified as PL-oiler, with maximum capacity of 0.65 pounds of oil per ton of steel, using no control and exhausting to the building interior.
    - i) Welding / Shearing operations to conduct continuous pickling.
    - j) Pickle Line Scale Breaker, controlled by a Wheelabrator baghouse (Model 120 Series 6P), and exhausting to stack 007.
  4. Batch Annealing system consisting of 18 bases and 9 batch annealing furnaces. The furnaces are identified as BA-01 through BA-09, with a maximum capacity of 6.0 million BTU per hour each, primarily fired on natural gas but also consuming evaporated oil from the coils being annealed and having propane backup, using low NO<sub>x</sub> burners for control, and exhausting to the building interior.
  5. Two Stand Reversing Cold Mill, identified as RCM-1, with a maximum capacity of 400,000 pounds of steel per hour, using a progressive purification filter system with stack skimming for control, and exhausting to stack 004.

6. Temper Mill, identified as TM-1, with a maximum capacity of 158,000 pounds of steel per hour, using no control and exhausting to the building interior.
7. Seven (7) space heating units, with a maximum capacity of 6.6 million BTU per hour each, fired on either natural gas or propane.

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

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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

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

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

## SECTION B GENERAL CONDITIONS

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

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

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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

### B.3 Enforceability [326 IAC 2-7-7]

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

### B.4 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.5 Severability [326 IAC 2-7-5(5)]

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

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

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

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

- (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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

- (b) The Permittee shall furnish to IDEM, OAQ and VCAPC, within a reasonable time, any information that IDEM, OAQ and VCAPC, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon

request, the Permittee shall also furnish to IDEM, OAQ and VCAPC, copies of records required to be kept by this permit.

- (c) For information furnished by the Permittee to IDEM, OAQ and VCAPC, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

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

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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 and VCAPC, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;

- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and VCAPC, may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ and VCAPC, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ VCAPC. IDEM, OAQ and VCAPC, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Vigo

County Air Pollution Control makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Vigo County Air Pollution Control within a reasonable time.

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

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

**IDEM, OAQ**

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

**VCAPC**

Telephone Number: 812-462-3433  
Facsimile Number: 812-462-3447

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

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

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

(C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and VCAPC, 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 and VCAPC, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ or VCAPC, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ or VCAPC, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ or VCAPC, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination**

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[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or VCAPC, 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 or VCAPC, 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 or VCAPC, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or VCAPC, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.16 Permit Renewal [326 IAC 2-7-4]**

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

Request for renewal shall be submitted to:

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre haute, Indiana 47807

- (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 and VCAPC, on or before the date it is due.

(2) If IDEM, OAQ and VCAPC, 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 and VCAPC, take final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and VCAPC, 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 and VCAPC, fail 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.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

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

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the 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

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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 and VCAPC, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible

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

(c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade 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.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, VCAPC, and 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 any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor 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.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

The application which shall be submitted by the Permittee does require the certification by the "responsible

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Opacity [326 IAC 5-1]

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

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

#### C.2 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.3 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. 326 IAC 9-1-2 is not federally enforceable.

#### C.4 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.5 Operation of Equipment [326 IAC 2-7-6(6)]

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

#### C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty

percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) 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, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

#### **C.8 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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ and VCAPC.

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

(b) The Permittee shall notify IDEM, OAQ and VCAPC of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and VCAPC, if the source submits to IDEM, OAQ and VCAPC, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

##### C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

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

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

**C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

**C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) 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.
- (b) Whenever a condition in this permit requires the measurement of any other operating parameter, the instrument 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.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ and VCAPC approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

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

- (c) If the ERP is disapproved by IDEM, OAQ and VCAPC, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ and VCAPC, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual 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);

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.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and VCAPC upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ and VCAPC shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.

- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and 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 a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are 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.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

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

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

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

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

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

- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

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

The statement must be submitted to:

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

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

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

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

- (a) Records of all required data, reports 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Vigo County Air Pollution Control makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Vigo County Air Pollution Control within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

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

And

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street

Terre Haute, Indiana 47807

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.20 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)]:

Galvanizing Line, identified as GAL-1, with a maximum capacity of 140,000 pounds of steel per hour consisting of the following equipment (Note: a portion of this line may be used as a continuous annealing line instead of galvanizing only):

- a) Galvanizing Line Strip Dryer Furnace, identified as GL-01, with a maximum capacity of 2.0 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO<sub>x</sub> burners for control, and exhausting to the building interior.
- b) Galvanizing Line Direct Fire Zone Furnace, identified as GL-02, with a maximum capacity of 45.3 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO<sub>x</sub> burners for control, and exhausting to stack 002.
- c) Galvanizing Line Radiant Heat Tube Furnace, identified as GL-03, with a maximum capacity of 13.2 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO<sub>x</sub> burners for control, and exhausting to stack 003.
- d) Galvanizing Line Chromate Spray Dryer Furnace, identified as GL-04, with a maximum capacity of 2.0 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO<sub>x</sub> burners for control, and exhausting to the building interior.
- e) Galvanizing Line Spray Cleaning section with a brush scrubber and strip rinse, identified as GL-05, utilizing hot alkali solution, using mist elimination for control, and exhausting to stack 006.
- f) Galvanizing Line Zinc Induction Melting section, identified as GL-06, with a maximum zinc melt capacity of 10,200 pounds per hour, using no control, and exhausting to the building interior.
- g) Galvanizing Line Temper Mill, identified as GL-07, utilizing a detergent as the rolling fluid, using no control, and exhausting to the building interior.
- h) Galvanizing Line Chromate Spray section, identified as GL-08, utilizing chromic acid, using no control, and exhausting to the building interior.

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

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

#### D.1.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a), each of the units in the Galvanizing Line shall not discharge any gases containing more than 0.03 grain per dry standard cubic foot (gr/dscf) of particulate matter.

#### 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 facility and any control devices.

### Compliance Determination Requirements

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

Prior to April, 2005, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing on the Galvanizing Line Spray Cleaner system outlet (GL-05) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid

compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

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

The mist eliminator for PM control shall be in operation at all times when the Galvanizing Line Spray Cleaning system is in operation. This requirement, in conjunction with the other provisions of this permit, make the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable. Note: The equipment covered in Section D.1 of this approval is not considered to be part of the nested source with regard to PSD applicability.

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

#### D.1.5 Monitoring

- (a) Monthly inspections shall be performed on the mist eliminator from the galvanizing line spray cleaning section (GL-05) to ensure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.5, the Permittee shall maintain a log of the monthly inspections on the mist eliminator including the status of the inspection and any response measures taken.
- (b) 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)]:

Three (3) Package Boilers, identified as PB-1 through PB-3, with a maximum capacity of 33.48 million BTU per hour each, primarily fired on natural gas but with propane backup, using low NO<sub>x</sub> burners for control, and exhausting to stacks 005A, 005B, and 005C respectively.

(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 General Provisions Relating to NSPS [326 IAC 12][40 CFR 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated under 326 IAC 12, apply to the boilers (PB-1, PB-2, PB-3)) except when otherwise specified in 40 CFR Part 60, Subpart Dc.

#### D.2.2 Particulate Matter (PM) [326 IAC 6-1-2(b)]

Pursuant to 326 IAC 6-1-2(b)(Particulate Limitations, Fuel Combustion), particulate matter (PM) emissions from the boilers (PB-1, PB-2, and PB-3) shall be limited to 0.01 grain per dry standard cubic foot.

#### D.2.3 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

The boilers (PB-1, PB-2, and PB-3) are not considered to be part of the nested source with regards to the applicability of 326 IAC 2-2 (Prevention of Significant Deterioration).

#### D.2.4 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.

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

#### D.2.5 NSPS Record Keeping Requirements [40 CFR 60.48c, Subpart Dc]

Pursuant to 40 CFR 60.48c(a) the Permittee shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7 (Subpart A). This notification shall include: The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

#### D.2.6 NSPS Fuel Use Recordkeeping [40 CFR 60.48c, Subpart Dc]

(a) Pursuant to 40 CFR 60.48c(g) the Permittee shall record and maintain records of the amounts of each fuel combusted during each day.

(b) Pursuant to 40 CFR 60.48c(i) all records required under this regulation shall be maintained by the Permittee for a period of two years following the date of such record.

## SECTION D.3 FACILITY OPERATION CONDITIONS

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

Pickle Line, identified as PL-1, with a maximum capacity of 800,000 pounds of steel per hour, utilizing Hydrochloric Acid as the pickling liquor, consisting of the following equipment:

- a) Four (4) pickle tanks, identified as pickle tank #1 through pickle tank #4, with a maximum capacity of 5,200 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
- b) One(1) five-chamber cascading re-circulating rinse tank, identified as rinse tank #1, with a maximum capacity of 3,800 gallons, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
- c) Strip Dryer, identified as PL-dryer, with a maximum capacity of 5,900 scfm of air heated in the package boilers, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
- d) Two (2) fresh acid storage tanks, identified as Tank #1 and Tank #2, with a maximum capacity of 24,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
- e) Four (4) pickle liquor re-circulation tanks, identified as Tank #3 through Tank #6, with a maximum capacity of 12,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
- f) Spent rinse water storage tank, identified as Tank #9, with a maximum capacity of 12,000 gallons, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
- g) Two (2) spent liquor storage tanks, identified as Tank #7 and #8, with a maximum capacity of 24,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
- h) Electrostatic Oiler, identified as PL-oiler, with maximum capacity of 0.65 pounds of oil per ton of steel, using no control and exhausting to the building interior.
- i) Welding / Shearing operations to conduct continuous pickling.
- j) Pickle Line Scale Breaker, controlled by a Wheelabrator baghouse (Model 120 Series 6P), and exhausting to stack 007.

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

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

#### D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the pickle line (PL-1) described in this section except when otherwise specified in 40 CFR Part 63, Subpart CCC.

#### D.3.2 NESHAP for Steel Pickling - HCl Process Facilities [40 CFR 63.1158, Subpart CCC]

The Hydrochloric Acid Pickling line (PL-1) is subject to the provisions of 40 CFR 63, Subpart CCC because the operation is a major source of Hazardous Air Pollutants (HAPs) and the specific process is covered by the

referenced Subpart.

D.3.3 NESHAP for Steel Pickling - HCl Process Facilities [40 CFR 63.1158, Subpart CCC]

The Permittee shall not cause or allow to be discharged into the atmosphere from the affected continuous pickling line (PL-1)

1. Any gases that contain HCl in a concentration in excess of 6 ppmv; or
2. HCl at a mass emission rate that corresponds to a collection efficiency of less than 99 percent.

D.3.4 NESHAP Operational and Equipment Standards (Hydrochloric Acid Storage Vessels) [40 CFR 63.1159, Subpart CCC]

The Permittee shall provide and operate, except during loading and unloading of acid, a closed-vent system for each vessel. Loading and unloading shall be conducted either through enclosed lines or each point where the acid is exposed to the atmosphere shall be equipped with a local fume capture system, ventilated through an air pollution control device.

D.3.5 NESHAP Maintenance Requirements [40 CFR 63.1160, Subpart CCC]

The Permittee shall comply with the operation and maintenance requirements of 40 CFR 63.6(e) (Subpart A, General Provisions). Additionally, the Permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan is incorporated by reference into the source's Title V Permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

1. Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
2. Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
3. Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling;
4. Require an inspection of each scrubber at intervals of no less than 3 months with;
  - A. Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
  - B. Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
  - C. Repair or replacement of droplet eliminator elements as needed;
  - D. Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
  - E. Adjustment of damper settings for consistency with the required air flow.
5. If the scrubber is not equipped with a view port or access hatch allowing visual inspection, alternate means of inspection approved by the Administrator may be used.
6. The Permittee shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement.
7. The Permittee shall maintain a record of each inspection, including each item identified in 4 above, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

#### D.3.6 NESHAP Monitoring Requirements[40 CFR 63.1162, Subpart CCC]

The Permittee shall comply with the following monitoring provisions:

1. The Permittee shall install, operate and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if required, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in 40 CFR 63.1160(b)(2).
2. Failure to record each of the operating parameters listed in above is a violation of the monitoring requirements.
3. Each monitoring device shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.
4. The Permittee may develop and implement alternative monitoring requirements subject to approval by VCAPC and IDEM, OAQ.
5. The Permittee shall inspect each affected hydrochloric acid storage vessel semiannually to determine that the closed-vent system and either the air pollution control device or the enclosed loading and unloading line, whichever is applicable, are installed and operating when required.

#### D.3.7 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

The hydrochloric acid pickle line (PL-1) is not considered to be part of the nested source with regards to the applicability of 326 IAC 2-2 (Prevention of Significant Deterioration).

#### D.3.8 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.3.9 NESHAP Performance testing and test methods[40 CFR 63.1161, Subpart CCC]

1. The Permittee shall conduct an initial performance test for each affected process or control device to determine and demonstrate compliance with the applicable emission limitation according to the requirements of 40 CFR 63.7 (Subpart A, General Provisions). This initial performance test shall meet the following minimum requirements:
  - A. Following approval of the site-specific test plan, the Permittee shall conduct a performance test for each process or control device to either measure simultaneously the mass flows of HCl at the inlet and the outlet of the control device (to determine compliance with the applicable collection efficiency standard) or measure the concentration of HCl in gases exiting the process or the emission control device (to determine compliance with the applicable emission concentration standard).
  - B. Compliance with the applicable emission concentration standard or collection efficiency standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.
  - C. Compliance is achieved if either the average collection efficiency as determined by the HCl mass flows at the control device inlet and outlet is greater than or equal to the applicable collection efficiency standard or the average measured concentration of HCl exiting the process or the emission control device is less than or equal to the applicable emission concentration standard.
  - D. Pursuant to 40 CFR 63.7(a)(2)(ii) this initial performance test was conducted on February 14, 2000 and shall be repeated annually.
2. The Permittee, during the performance test for each emission control device, using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation, the minimum recirculation water flow rate. During

the emission test, each parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The Permittee shall determine the operating parameter monitoring values as the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per 40 CFR 63.1161(a)(2). The Permittee may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, the Permittee may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

3. The following test methods from Appendix A of 40 CFR Part 60 shall be used to determine compliance under Condition D.3.3 if required:
  - A. Method 1, to determine the number and location of sampling points, with the exception that no sampling traverse point shall be within one inch of the stack or duct wall;
  - B. Method 2, to determine gas velocity and volumetric flow rate;
  - C. Method 3, to determine the molecular weight of the stack gas;
  - D. Method 4, to determine the moisture content of the stack gas; and
  - E. Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources – Isokinetic Method," to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (dscm) [30 dry standard cubic feet (dscf)]. The concentration of HCl shall be calculated for each run as follows:  $C_{HCl(ppmv)} = 0.659 C_{HCl(mg/dscm)}$ , where  $C_{(ppmv)}$  is concentration in ppmv and  $C_{(mg/dscm)}$  is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.
  - F. The Permittee may use equivalent alternative measurement methods approved by U.S. EPA.
4. The Permittee shall conduct performance tests to measure the HCl mass flows at the control device inlet and outlet or the concentration of HCl exiting the control device according to the procedures described in 40 CFR 63.1161. Performance tests shall be conducted annually. If any performance test shows that the HCl emission limitation is being exceeded, then the Permittee is in violation of the emission limit.

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

#### D.3.10 Visible Emissions Notations

- (a) Once per shift visible emission notations of the Pickle Line Scale Breaker stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### D.3.11 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Pickle Line Scale Breaker, at least once per shift when the Pickle Line Scale Breaker is in operation when venting to the

atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 to 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

#### D.3.12 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Pickle Line Scale Breaker operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### D.3.13 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business 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) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.3.14 NESHAP Notification Requirements [40 CFR 63.1163, Subpart CCC]

The Permittee shall submit the following written notifications to VCAPC and IDEM, OAQ.

1. The Permittee shall submit an initial notification pursuant to the requirements of 40 CFR 63.9(b)(4) (Subpart A, General Provisions). The notification shall provide the information specified in 40 CFR 63.9(b)(4)(i) through 63.9(b)(4)(v), delivered or postmarked with the notification required in 40 CFR 63.9(b)(5).
2. If the source is subject to special compliance requirements as specified in 40 CFR 63.6(b)(3) and (4), the Permittee shall notify U.S. EPA of their compliance obligations not later than the notification dates established in 40 CFR 63.9(b) for new sources that are not subject to the special provisions.
3. The Permittee shall notify U.S. EPA, VCAPC and IDEM, OAQ in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin to allow U.S. EPA, VCAPC and IDEM, OAQ to review and approve the site-specific test plan required under 40 CFR 63.7(c), if requested by U.S. EPA, VCAPC or IDEM, OAQ, and to have an observer present during the test.

4. The permittee shall submit a notification of compliance status as required by 40 CFR 63.9(h).

#### D.3.15 NESHAP Reporting Requirements [40 CFR 63.1164, Subpart CCC]

1. The Permittee shall complete the following reporting requirements:
  - A. The Permittee shall report the results of the initial performance test, and any subsequent performance tests, as part of the notification of compliance status required in Condition D.3.14.
  - B. If the Permittee receives an extension on compliance, then the Permittee shall submit progress reports to VCAPC and IDEM, OAQ pursuant to 40 CFR 63.6(i) (Subpart A, General Provisions) by the dates specified in the written extension of compliance.
  - C. The Permittee is required by 40 CFR 63.6(e) to operate and maintain each affected emission source, including associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions (at least to the level required by the standard) at all times, including startup, shutdown and malfunction. Malfunctions must be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown and malfunction plan.
    - i. The Permittee is required by 40 CFR 63.6(e)(3) to develop and implement a written startup, shutdown and malfunction plan that provides a detailed description of the procedures for operating and maintaining the emission source or control system during a period of startup, shutdown or malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.
    - ii. As required by 40 CFR 63.10(d)(5)(i), actions taken during a startup, shutdown or malfunction by the Permittee that are consistent with the procedures specified in the startup, shutdown, and malfunction plan shall be stated in a semiannual report. The report, to be certified by the Permittee or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30<sup>th</sup> day following the end of each calendar half.
    - iii. Actions taken during a startup, shutdown or malfunction that are not consistent with the procedures specified in the startup, shutdown, and malfunction plan shall meet all the requirements under 40 CFR 63.10(d)(5)(ii).

#### D.3.16 NESHAP Recordkeeping requirements [40 CFR 63.1165, Subpart CCC]

1. The Permittee, as required by 40 CFR 63.10(b)(2) (Subpart A, General Provisions), shall maintain general records for 5 years from the date of each record of:
  - A. The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
  - B. The occurrence and duration of each malfunction of the air pollution control equipment;
  - C. All maintenance performed on the air pollution control equipment;
  - D. Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
  - E. All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form. (See 40 CFR 63.10(b)(2)(v));
  - F. All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;
  - G. All results of initial or subsequent performance tests;
  - H. If the Permittee has been granted a waiver from recordkeeping or reporting under 40 CFR 63.10(f), any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or

- reporting requirements;
- I. If the Permittee has been granted a waiver from the initial performance test under 40 CFR 63.7(h), a copy of the full request and U.S. EPA approval or disapproval;
  - J. All documentation supporting initial notifications and notifications of compliance status required by 40 CFR 63.9; and
  - K. Records of any applicability determination, including supporting analyses.
2. In addition to the general records required in (1) of this condition, the Permittee shall maintain records for 5 years from the date of each record of:
    - A. Scrubber makeup water flow rate and recirculation water flow rate;
    - B. Calibration and manufacturer certification that monitoring devices are accurate to within 5-percent and of semiannual calibration;
    - C. Each maintenance inspection and repair, replacement, or other corrective action; and
    - D. The Permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by US EPA, VCAPC and IDEM, OAQ for the life of the affected source or until the source is no longer subject to these provisions. In addition, if the operation and maintenance plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by US EPA, VCAPC and IDEM, OAQ for a period of 5 years after each revision to the plan.
  3. The records required in this condition for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

#### D.3.17 Record Keeping Requirements

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- (a) To document compliance with Condition D.3.10, the Permittee shall maintain records of each shift visible emission notation of the Pickle Line Scale Breaker stack exhaust.
- (b) To document compliance with Condition D.3.11, the Permittee shall maintain the following:
  - (1) Once per shift 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.3.12, the Permittee shall maintain records of the results of the inspections required under Condition D.3.12 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.4 FACILITY OPERATION CONDITIONS

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

1. Batch Annealing system consisting of 18 bases and 9 batch annealing furnaces. The furnaces are identified as BA-01 through BA-09, with a maximum capacity of 6.0 million BTU per hour each, primarily fired on natural gas but also consuming evaporated oil from the coils being annealed and having propane backup, using low NO<sub>x</sub> burners for control, and exhausting to the building interior.
2. Two Stand Reversing Cold Mill, identified as RCM-1, with a maximum capacity of 400,000 pounds of steel per hour, using a progressive purification filter system with stack skimming for control, and exhausting to stack 004.
3. Temper Mill, identified as TM-1, with a maximum capacity of 158,000 pounds of steel per hour, using no control and exhausting to the building interior.
4. Seven (7) space heating units, with a maximum capacity of 6.6 million BTU per hour each, fired on either natural gas or propane.

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

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

#### D.4.1 Particulate Matter Limitation (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a), the Batch Annealing System(BA01 - BA09), Two Stand Reversing Cold Mill (RCM-1), Temper Mill (TM-1), and the Space Heating Units shall not discharge any gases containing more than 0.03 grain per dry standard cubic foot (g/dscf) of particulate matter.

#### D.4.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

The Batch Annealing system, Reversing Cold Mill (RCM-1) and Temper Mill (TM-1) are considered to be part of the nested source with regards to the applicability of 326 IAC 2-2 (Prevention of Significant Deterioration).

#### D.4.3 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 these facilities and their control devices.

### Compliance Determination Requirements

#### D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Prior to June, 2005, in order to demonstrate compliance with Condition D.4.1, the Permittee shall perform PM testing on the Progressive Purification filter system outlet utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Within 6 months after issuance of this Significant Permit Modification (167-18865-00120), in order to demonstrate compliance with Condition D.4.1 and to verify the emission factors, the Permittee shall perform PM and PM<sub>10</sub> testing for the Temper Mill exhaust utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.

#### D.4.5 Particulate Matter (PM)

The progressive purification system for PM control shall be in operation at all times when the Reversing Cold Mill is in operation. This requirement, in conjunction with the other provisions of this permit, make the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

### **D.4.6 Monitoring**

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- (a) Monthly inspections shall be performed on the progressive purification filter system to ensure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

### **D.4.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.4.1 and D.4.6, the Permittee shall maintain a log of the monthly inspections on the progressive purification filter system including the status of the inspection and any response measures taken.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
VIGO COUNTY AIR POLLUTION CONTROL  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: CSN, LLC  
Source Address: 455 West Industrial Drive, Terre Haute, Indiana 47802  
Mailing Address: 455 West Industrial Drive, Terre Haute, Indiana 47802  
Part 70 Permit No.: T167-12516-00120

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**VIGO COUNTY AIR POLLUTION CONTROL  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807  
Phone: 812-462-3433  
Fax: 812-462-3447**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: CSN, LLC  
Source Address: 455 West Industrial Drive, Terre Haute, Indiana 47802  
Mailing Address: 455 West Industrial Drive, Terre Haute, Indiana 47802  
Part 70 Permit No.: T167-12516-00120

**This form consists of 2 pages**

**Page 1 of 2**

<p><b>9</b> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <p><b>C</b> The Permittee must notify the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC), within four (4) business hours (IDEM: 1-800-451-6027 or 317-233-5674, ask for Compliance Section and VCAPC: 812-462-3433); and</p> <p><b>C</b> The Permittee must submit notice in writing or by facsimile within two (2) working days (IDEM Facsimile Number: 317-233-5967 and VCAPC ), and follow the other requirements of 326 IAC 2-7-16.</p>
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If any of the following are not applicable, mark N/A

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

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

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

Form Completed by: \_\_\_\_\_

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

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

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
and  
VIGO COUNTY AIR POLLUTION CONTROL**

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: CSN. LLC  
Source Address: 455 West Industrial Drive, Terre Haute, Indiana 47802  
Mailing Address: 455 West Industrial Drive, Terre Haute, Indiana 47802  
Part 70 Permit No.: T167-12516-00120

<input checked="" type="radio"/> Natural Gas Only <input checked="" type="radio"/> Alternate Fuel burned From: _____ To: _____
--

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature: _____
Printed Name: _____
Title/Position: _____
Phone: _____
Date: _____

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
and  
VIGO COUNTY AIR POLLUTION CONTROL**

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

Source Name: CSN, LLC  
Source Address: 455 West Industrial Drive, Terre Haute, Indiana 47802  
Mailing Address: 455 West Industrial Drive, Terre haute, Indiana 47802  
Part 70 Permit No.: T167-12516-00120

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

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

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

Form Completed By: \_\_\_\_\_

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

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

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality  
And Vigo County Air Pollution Control**

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

**Source Background and Description**

<b>Source Name:</b>	<b>CSN, LLC</b>
<b>Source Location:</b>	<b>455 West Industrial Drive, Terre Haute, IN 47802</b>
<b>County:</b>	<b>Vigo</b>
<b>SIC Code:</b>	<b>3316</b>
<b>Operation Permit No.:</b>	<b>T167-12516-00120</b>
<b>Operation Permit Issuance Date:</b>	<b>June 24, 2003</b>
<b>Permit Modification No.:</b>	<b>T167-18865-00120</b>
<b>Permit Reviewer:</b>	<b>Scott Sines</b>

The Vigo County Air Pollution Control office (VCAPC) has reviewed a modification application from CSN, LLC relating to the testing requirements for the galvanizing line and the temper mill.

**Explanation of Modification**

CSN, LLC is an existing stationary steel processing plant and an existing PSD minor source. Their Title V permit (T167-12516-00120) was issued on June 24, 2003. The galvanizing spray line and the Temper Mill were to be tested between 6 and 12 months after permit issuance (conditions D.1.3(b) and D.4.4(b)). However on March 29, 2004 CSN, LLC submitted a request to delete the testing requirements in Conditions D.1.3(b) and D.4.4(b) since neither of the processes emit VOCs and PM emissions from the two processes are, in their terms, "insignificant". Based on MSDS sheets provided by CSN, LLC the source is correct in their assessment that neither of the processes emit VOCs.

In CSN's Part 70 Operating Permit the calculations for the galvanizing spray line were based on an alternate emission factor. As CSN had been operating the galvanizing spray line under the permit for over one year VCAPC requested production figures from CSN in order to more accurately calculate emissions from the galvanizing spray line. On September 8, 2004 CSN, LLC submitted calendar year (CY) 2003 and 2004 production figures for the production of galvanized steel and the use of chromic acid used to produce the galvanized steel. The one and one-half years of data reflect actual usage, with CY03 reflecting the higher application rate. VCAPC used the production figures from CY03 as the basis for computing potential emissions using a mass balance approach. The resultant chromic acid application calculations were prepared using this mass balance approach and are presented in Appendix A, page 1. Based on this application rate, and extrapolating the calculations to reflect the maximum design production capability of the galvanizing line (350,000 tons of galvanized steel per year), CSN, LLC has a maximum potential to emit chromium compounds of 13.64 tons per year. Although the potential to emit from the galvanizing spray line is now higher than that listed in the original Part 70 Operating Permit, the new calculations better reflect CSN's potential to emit because it is based on a material balance approach instead of an alternate emission factor. VCAPC considers this level of potential

emissions to be very conservative. The mass balance calculations made assume all chromium compounds are lost to the atmosphere even though it is understood that a portion of the chromium compounds remain on the galvanized steel.

In CSN's Part 70 Operating Permit the calculations for the Temper Mill were based on an alternate emission factor. In an attempt to back calculate emissions from the Temper Mill VCAPC used two sets of stack test results from CSN's Reversing Cold Mill. The two stack tests were accomplished on August 21, 2000 and May 11, 2004. The main difference between a Temper Mill and a Reversing Cold Mill is the use of heat. Both Mills are used to progressively thin the rolls of steel using hydraulic rollers and their operations are nearly identical other than the use of a heated coolant. VCAPC reviewed the results of the Reversing Cold Mill stack tests and attempted to back calculate Temper Mill emissions based on those results. The main problem with this approach was that the Reversing Cold Mill uses a coolant heated to approximately 115°C which produces steam during in the milling process. Further, neither of the two stack tests tested the efficiency of the progressive purification system (nor were they required to do so). Without a known efficiency this led to further assumptions having to be made in order to back calculate emissions for the Temper Mill. A stack test from AK Steel's (147-00041) Temper Mill was also reviewed, however their Temper Mill uses an oil mist elimination system for control. Per the stack test protocol the AK Steel stack test did not test the efficiency of the oil mist elimination system either. As a result VCAPC was unable to accurately calculate potential emissions from the Temper Mill. The original, unverified CSN Temper Mill calculations are contained in Appendix A, page 2 and the requirement to test for PM and PM10 remains. As CSN's Temper Mill now uses a non-VOC roll coolant, VOC emissions have been eliminated and the requirement to test for VOC emissions is no longer applicable.

### **Justification for the Modification**

This modification is being performed through a Part 70 Significant Permit Modification pursuant to 326 IAC 2-7-12(d) because this is a modification that significantly changes permit conditions for testing requirements.

### **Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls.

In a letter dated July 12, 2000, US EPA Region V ruled that a source such as CSN LLC (Heartland Steel at the time) should be considered as having a nested source when determining PSD applicability. The entire operation is compared to the 250 ton per year limitation for sources that are not in one of the listed categories. The nested source portion only would be considered as a listed source (for the Iron and Steel Mill Plant category) and would therefore be compared to the 100 ton per year threshold. The operations are divided up based on their SIC Code. All operations with a two-digit SIC Code of 33 are considered as part of the nested source. The operations that fall into the two-digit SIC Code are: Batch Annealing (SIC 3398), Reversing Cold Rolling Mill (SIC 3316), and the Temper Mill (SIC 3398).

Although the entire source's PM and PM10 potentials to emit have increased, the increases from the galvanizing spray line do not affect the nested source portion's potential to emit. Even with these changes the source remains a minor source under PSD as shown in the following tables. These tables show the source status after all the changes this modification considers:

**Entire Source**

	Pollutant							
	PM	PM10	SO2	NOx	VOC	CO	HCL	Chromium
GL strip dryer	0.04	0.07	0.09	1.34	0.05	0.74		
GL direct fire	1.30	1.51	2.08	41.20	1.09	16.67		
GL radiant heat	0.38	0.44	0.61	12.01	0.32	4.86		
GL chrom spray dryer	0.04	0.07	0.09	1.34	0.05	0.74		
BA line furnaces	1.03	1.80	2.48	36.19	1.30	19.87		
Package Boilers	2.88	3.34	4.62	91.35	2.42	36.95		
PL HCL Emissions*	9.86	9.86					9.86	
GL spray cleaning*	0.70	0.70						
GL induction melting	2.23	2.23						
GL chromate spray	<del>1.23</del> <b>13.64</b>	<del>1.23</del> <b>13.64</b>						<del>1.23</del> <b>13.64</b>
Reversing Cold Mill*	48.81	48.81			14.64			
Temper Mill	19.10	19.10			<del>2.68</del> <b>0.0</b>			
Space Heaters	0.88	1.54	2.12	30.96	1.11	17.00		
Other Heating	0.06	0.10	0.14	2.01	0.07	0.53		
Generators	0.51	0.51	2.93	17.36	0.51	4.15		
Scale Breaker	0.38	0.38						
Total PTE (After Cont)	<del>89.42</del> <b>101.83</b>	<del>91.66</del> <b>104.07</b>	15.16	233.76	<del>24.24</del> <b>21.56</b>	101.49	9.86	<del>1.23</del> <b>13.64</b>

\* - Indicates some form of limitation exists. Those limitations are: the Pickle Line Scrubber System must be in operation at all times; the Galvanizing Line Spray Cleaning mist eliminator must be in operation at all times; and the Reversing Cold Mill progressive purification system must be in operation at all times.

Since no criteria pollutant exceeds the 250 ton per year threshold, the source will still be considered as an existing minor source with regard to the PSD requirements.

**Nested Source**

	Pollutant							
	PM	PM10	SO2	NOx	VOC	CO	HCL	Chromium
BA line furnaces	1.03	1.80	2.48	36.19	1.30	19.87		
Reversing Cold Mill*	48.81	48.81			14.64			
Temper Mill	19.10	19.10			<del>2.68</del> <b>0.0</b>			
Total PTE (After Cont)	68.94	69.70	2.48	36.19	<del>18.62</del> <b>15.94</b>	19.87	0.00	0.00

\* - Indicates some form of limitation exists. This limitation is: the Reversing Cold Mill progressive purification system must be in operation at all times.

Since no pollutant exceeds the 100 ton per year threshold, the nested source will still be considered as an existing minor source with regard to the PSD requirements.

### Recommendation

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

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

An administratively complete Permit Modification application for the purposes of this review was received on March 29, 2004. Additional information was received on September 8, 2004. Results of CSN's Reversing Cold Mill stack tests, a stack test from Nucor Steel in Crawfordsville IN, and a stack test from AK Steel in Rockport, IN were also reviewed on January 19, 2005.

### Proposed Changes

The following terms and conditions from Part 70 Permit T167-12516-00120 have been revised in this permit modification. **Bold** language delineates verbiage that has been added; language with a ~~strikeout~~ delineates verbiage that has been deleted.

Condition B.8 (Compliance with Permit Conditions) was deleted and added to the signature page.

#### Signature Page

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

The Table of Contents has been re-numbered to reflect changes made in this Significant Permit Modification.

Condition A.1 was revised to reflect the April 2004 designation of Vigo County with regard to the 8-hour Ozone Standard.

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

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The Permittee owns and operates a stationary steel processing plant.

Responsible Official:	Vice President - Operations
Source Address:	455 West Industrial Drive, Terre Haute, Indiana 47802
Mailing Address:	455 West industrial Drive, Terre Haute, Indiana 47802
General Source Phone Number:	(812) 299-4157
SIC Code:	3316
County Location:	Vigo County
Source Location Status:	<b>Basic nonattainment for ozone under the 8-hour standard</b> Maintenance Attainment for Sulfur Dioxide (SO <sub>2</sub> ) Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD <b>and Emission Offset</b> Rules

Major Source, Section 112 of the Clean Air Act  
1 of 28 Source Categories (Nested)

Condition B.8 was deleted from Section B and was included on the front page (see above).

~~B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]~~

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~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~(1) Enforcement action;~~

~~(2) Permit termination, revocation and reissuance, or modification; or~~

~~(3) Denial of a permit renewal application.~~

~~(b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.~~

~~(c) 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.~~

~~(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.~~

Condition B.23 was revised to reflect the new name for that Section of IDEM-OAQ.

**B.243 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]**

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

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, ~~I/M & Billing Section~~ **Billing, Licensing, and Training Section**), to determine the appropriate permit fee.

Condition B.24 was added to reflect changes made in the 8-14-04 Title V model.

**B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]**

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

Condition D.1.3(b) was deleted to reflect the removal of periodic testing requirements.

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

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~~(a) Prior to April, 2005, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing on the Galvanizing Line Spray Cleaner system outlet (GL-05) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.~~

~~(b) During the period between 6 and 12 months after issuance of this Part 70 permit, in order to demonstrate compliance with Condition D.1.1 and in order to verify the emission factors used, the Permittee shall perform PM, PM-10, and chromate compound testing for the Galvanizing Line Chromate Spray (GL-08) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.~~

Condition D.4.4(b) was changed to reflect the removal of periodic VOC testing requirements.

#### D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) Prior to June, 2005, in order to demonstrate compliance with Condition D.4.1, the Permittee shall perform PM testing on the Progressive Purification filter system outlet utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

(b) Within 6 months after issuance of this ~~Part 70 permit~~ **Significant Permit Modification (167-18865-00120)**, in order to demonstrate compliance with Condition D.4.1 and to verify the emission factors, the Permittee shall perform PM **and** PM10 ~~and~~ VOC testing for the Temper Mill exhaust utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

#### **Conclusion**

This permit modification shall be subject to the conditions of the attached Part 70 Significant Permit Modification No. 167-18865-00120.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Significant Permit Modification for a Part 70 Operating Permit

<b>Source Name:</b>	<b>CSN, LLC</b>
<b>Source Location:</b>	<b>455 West Industrial Drive, Terre Haute, IN 47802</b>
<b>County:</b>	<b>Vigo</b>
<b>SIC Code:</b>	<b>3316</b>
<b>Operation Permit No.:</b>	<b>T167-12516-00120</b>
<b>Operation Permit Issuance Date:</b>	<b>June 24, 2003</b>
<b>Permit Modification No.:</b>	<b>T167-18865-00120</b>
<b>Permit Reviewer:</b>	<b>Scott Sines</b>

On March 29, 2005, the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) had a notice published in the Terre Haute Tribune Star, Terre Haute Indiana, stating that CSN, LLC had applied for a Significant Permit Modification to a Part 70 Operating Permit to operate stationary steel processing plant. The notice also stated that OAQ and VCAPC proposed to issue a permit modification for this operation and provided information on how the public could review the proposed 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 April 29, 2005, CSN, LLC submitted comments on the proposed Part 70 Significant Permit Modification. The summary of the comments is as follows:

#### **Comment:**

CSN, LLC would like to delete the requirement to perform periodic PM and PM10 testing for the Temper Mill exhaust contained in condition D.4.4 of the Part 70 permit and disagrees with VCAPC's decision to leave the requirement in the permit. CSN, LLC bases their request on the Part 70 permit's technical support document calculations for the Temper Mill emissions of 19.10 tons per year of PM and PM10.

#### **Response to Comment:**

Reference: CSN, LLC's Part 70 permit technical support document calculations, page 2. Several assumptions were made by using alternate emission factors when calculating PM and PM10 emissions from the Temper Mill. Since the alternate emission factors and assumptions could not be validated, a requirement to test the Temper Mill for PM, PM10, and VOC was included in condition D.4.4 of the permit. CSN now uses a non-VOC lubricant in the Temper Mill so the VOC testing requirement has been deleted in this Significant Permit Modification. However since the PM and PM10 emission calculations have not yet been verified, the requirement to test the Temper Mill's PM and PM10 emissions remains. As the CSN Temper Mill's calculations were accomplished using an unverified alternate emission factor an initial test of the Temper Mill is required in order to establish the baseline for future estimation of emissions.



				<b>CSN, LLC</b>						
				445 West Industrial Drive, Terre Haute, Indiana 47802						
				T 167-12561-00120						
				Reviewer: Rob Harmon						
				Date: July 19, 2000						
				Temper Mill						
On March 31, 1998 Nucor Steel in Crawfordsville tested a similar piece of equipment. The results of this stack test will be used to estimate the potential emissions from CSN's Temper Mill.										
0.218	Average PM and PM10 emission rate during the test (pounds per hour)									
0.95	Assumed fraction removed by the mist elimination system on Nucor's process									
2000	Pounds per ton (conversion factor)									
8760	Hours per year (conversion factor)									
4.36	Calculated pounds per hour before control (tested emission rate / (1-fraction controlled))									
19.10	Calculated tons per year @ 8760 (for PM and PM10)									
0.14	ratio of VOC emissions to PM emissions from the AK Steel construction permit (167-6713-00041)									
2.68	Calculated tons per year @ 8760 (for VOC)									
Assumptions:										
	Nucor Steel only tested the outlet emission rate, not the control efficiency. Therefore, an efficiency (95%) had to be assumed in order to back calculate before control emissions. This back calculation is necessary because CSN, LLC does not utilize the mist elimination system. Ninety-five percent (95%) was chosen as a best case for this type of equipment based on prior experience with mist elimination systems. By choosing the maximum control efficiency, the resulting before control emission rate is maximized. This approach ensures any errors would result in over-estimation of emission rates. The AK Steel ratio between PM and VOC is valid in this case (because the equipment is similar). PM is assumed to be equal to PM10 for this operation (based on the Nucor test results).									
Since this alternate emission factor was never verified, an initial and periodic stack test will be required.										