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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 31, 2005

RE: OmniSource / 099-19433-00100

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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

Enclosures
FNTVOP.dot 1/10/05

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www.IN.gov/idem

NEW SOURCE CONSTRUCTION PERMIT AND PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

OmniSource
12340 Elm Road
Bourbon, Indiana 46504

(herein known as the Permittee) is hereby authorized to construct and 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 2-5.1, 40 CFR 52.780 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also address the requirements for construction of a new source and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-5.1, applicable to those conditions.

Operation Permit No.: T099-19433-00100	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 31, 2005 Expiration Date: January 31, 2010

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary iron block production plant.

Authorized Individual:	Manager
Source Address:	12340 Elm Road, Bourbon, Indiana 46504
Mailing Address:	3101 Maumee Avenue, Fort Wayne, Indiana 46803
General Source Phone:	(260) 423-8595
SIC Code:	5093
County Location:	Marshall
Source Location Status:	Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) overs (big iron scraps) handling process, with a maximum throughput rate of 12 tons of fines per hour, equipped with cyclone C-2 and controlled by baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) feeding hopper, with a maximum throughput rate of 12 tons of overs per hour.

(2) One (1) oscillating feed conveyor, with a maximum throughput rate of 12 tons of overs per hour.

(3) One (1) crusher, with a maximum throughput rate of 12 tons of overs per hour.

(4) Three (3) conveyors, each with a maximum throughput rate of 12 tons of overs per hour.

(b) One (1) fines (small iron scraps) handling feeding process, with a maximum throughput rate of 50 tons of fines per hour, equipped with cyclone C-2 and controlled by baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) hopper with a bar grate screen.

(2) One (1) screw conveyor.

(3) One (1) oscillating feed conveyor.

(4) One (1) magnetic drum separator.

(5) One (1) screen, with a maximum throughput rate of 20 tons of fines per hour.

(6) Three (3) conveyors.

(7) One (1) bucket elevator conveyor.

(8) Two (2) screw conveyors.

(9) Two (2) fines storage silos.

(c) One (1) rotary screening process, with a maximum throughput rate of 60 tons of iron scrap (both overs and fines) per hour, equipped with cyclone C-1 and controlled by baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) feeding hopper, with a maximum throughput rate of 30 tons per hour.

(2) One (1) oscillating feed conveyor, with a maximum throughput rate of 30 tons per hour.

(3) One (1) rotary screen.

(4) Two (2) conveyors.

(5) One (1) vibrating screen.

(6) Six (6) oscillating conveyors.

(d) One (1) coke breeze handling process, with a maximum throughput rate of 30 tons of coke breeze per hour, equipped with cyclone C-2 and controlled by baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) feeding hopper, with a maximum throughput rate of 30 tons per hour.

(2) One (1) oscillating feed conveyor, with a maximum throughput rate of 30 tons per hour.

(3) One (1) vibrating screen.

(4) Two (2) conveyors.

(5) One (1) coke storage silo.

(e) One (1) sizing process, with a maximum throughput rate of 51.9 tons of iron scrap per hour, equipped with cyclone C-2 and controlled by baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) Seven (7) screw conveyors.

(2) Four (4) bucket elevator conveyors.

(3) Four (4) silos for sized iron material.

(4) One (1) traveling hopper for sized iron material.

(5) One (1) conveyor for sized iron material.

(6) One (1) conveyor for oversized iron scraps.

(7) Two (2) conveyors for recycled iron material.

(f) One (1) mixing process, with a maximum throughput rate of 55 tons/hr, controlled by

cyclone C-1 and baghouse CD1, and exhausting through stack S-1. This unit is used to mix the iron scraps, coke breeze, and binders.

(g) One (1) pressing operation, identified as EU-2, with a maximum throughput rate of 50 tons/hr, used to press the iron scrap mixture into iron blocks, controlled by cyclone C-1 and baghouse CD1, and exhausting through stack S-1.

(h) One (1) curing process, identified as EU-3, with a maximum capacity of 600 tons of the iron blocks.

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

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

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

(b) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) One (1) storage tank for binder containing VOC, identified as Tank 2, to be constructed in 2004, with a maximum capacity of 12,683 gallons. [326 IAC 12]

(2) Indoor storage piles, including the following: [326 IAC 6-4]

(A) Scrap and sludge storage piles, with a total maximum throughput rate of 240 tons per day.

(B) Overs storage piles, with a total maximum throughput rate of 96 tons per day.

(C) Fines storage piles, with a total maximum throughput rate of 50 tons per day.

(D) Coke breeze storage piles, with a total maximum throughput rate of 28 tons per day.

(E) One (1) sand pile, with a maximum throughput rate of 52 tons per day.

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T099-19433-00100, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of initial start-up 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

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, 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

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, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

(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

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, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed 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, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

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

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

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

B.13 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

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.14 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.15 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.16 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

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)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.17 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.18 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

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

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

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

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

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 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.20 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 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

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

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

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

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

B.23 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

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

B.24 Term of Conditions [326 IAC 2-1.1-9.5]

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

(1) The condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(2) The emission unit to which the condition pertains permanently ceases operation.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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 unit vented to the control equipment is in operation.

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

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

C.8 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

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

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

(f) Demolition and renovation

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 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.11 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 when operation begins. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

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

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(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 (2%) of full scale reading.

(b) The Permittee may request the IDEM, OAQ 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.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within 180 days from the date on which this source commences operation.

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, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.16 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. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared prior to commencing operation of the new facilities 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 timeframe 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 or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frame specified by the applicable 40 CFR 60/63 requirements.

(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 Operation, Maintenance and Monitoring (OMM) Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) 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, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from 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, in accordance with Section D, 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.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

C.18 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 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

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

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

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

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

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

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

(d) Unless otherwise specified in this permit, 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 initial start-up and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) overs (big iron scraps) handling process, with a maximum throughput rate of 12 tons of fines per hour, equipped with cyclone C-2 and controlled by baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) feeding hopper, with a maximum throughput rate of 12 tons of overs per hour.

(2) One (1) oscillating feed conveyor, with a maximum throughput rate of 12 tons of overs per hour.

(3) One (1) crusher, with a maximum throughput rate of 12 tons of overs per hour.

(4) Three (3) conveyors, each with a maximum throughput rate of 12 tons of overs per hour.

(b) One (1) fines (small iron scraps) handling feeding process, with a maximum throughput rate of 50 tons of fines per hour, equipped with cyclone C-2 and controlled by baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) hopper with a bar grate screen.

(2) One (1) screw conveyor.

(3) One (1) oscillating feed conveyor.

(4) One (1) magnetic drum separator.

(5) One (1) screen, with a maximum throughput rate of 20 tons of fines per hour.

(6) Three (3) conveyors.

(7) One (1) bucket elevator conveyor.

(8) Two (2) screw conveyors.

(9) Two (2) fines storage silos.

(c) One (1) rotary screening process, with a maximum throughput rate of 60 tons of iron scrap (both overs and fines) per hour, equipped with cyclone C-1 and controlled by baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) feeding hopper, with a maximum throughput rate of 30 tons per hour.

(2) One (1) oscillating feed conveyor, with a maximum throughput rate of 30 tons per hour.

(3) One (1) rotary screen.

(4) Two (2) conveyors.

(5) One (1) vibrating screen.

(6) Six (6) oscillating conveyors.

(d) One (1) coke breeze handling process, with a maximum throughput rate of 30 tons of coke breeze per hour, equipped with cyclone C-2 and controlled by baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) feeding hopper, with a maximum throughput rate of 30 tons per hour.

(2) One (1) oscillating feed conveyor, with a maximum throughput rate of 30 tons per hour.

(3) One (1) vibrating screen.

(4) Two (2) conveyors.

(5) One (1) coke storage silo.

(e) One (1) sizing process, with a maximum throughput rate of 51.9 tons of iron scrap per hour, equipped with cyclone C-2 and controlled by baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) Seven (7) screw conveyors.

(2) Four (4) bucket elevator conveyors.

(3) Four (4) silos for sized iron material.

(4) One (1) traveling hopper for sized iron material.

(5) One (1) conveyor for sized iron material.

(6) One (1) conveyor for oversized iron scraps.

(7) Two (2) conveyors for recycled iron material.

(f) One (1) mixing process, with a maximum throughput rate of 55 tons/hr, controlled by cyclone C-1 and baghouse CD1, and exhausting through stack S-1. This unit is used to mix the iron scraps, coke breeze, and binders.

(g) One (1) pressing operation, identified as EU-2, with a maximum throughput rate of 50 tons/hr, used to press the iron scrap mixture into iron blocks, controlled by cyclone C-1 and baghouse CD1, and exhausting through stack S-1.

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

Construction Conditions

General Construction Conditions

D.1.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.1.2 Part 70 Permit [326 IAC 2-7]

The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application.

Effective Date of the Permit

D.1.3 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if

construction is suspended for a continuous period of one (1) year or more.

D.1.4 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.5 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

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

D.1.6 PM and PM10 Emissions [326 IAC 2-2]

The PM/PM10 emissions from baghouse CD1, which is used to control the material handling, rotary screening, sizing, mixing, and pressing processes, shall be limited to less than 10.3 lbs/hr.

Combined with the PM/PM10 emissions from the insignificant activities, the PM/PM10 emissions from the entire source are limited to less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.1.7 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following processes shall not exceed the pound per hour limit listed in the table below:

Unit Description	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Overs Handling Process	12.0	21.7
Fines Handling Process	50.0	44.6
Rotary Screening Process	60.0	46.3
Coke Breeze Handling Process	30.0	40.0
Sizing Process	51.9	44.9
Mixing Process	55.0	45.5
Pressing	50.0	44.6

The pounds per hour limitations were calculated using one of the following equations:

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

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

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

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

D.1.8 VOC Emissions [326 IAC 8-1-6]

The VOC emissions from each of the mixing and the pressing processes shall not exceed 0.23 lbs/hr. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

D.1.9 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.1.10 PM and PM10 Emission Control

In order to comply with Conditions D.1.6 and D.1.7, cyclone C-1, cyclone C-2, and baghouse CD1 for particulate control shall be in operation and control emissions from the raw material handling, rotary screening, sizing, mixing, and pressing processes at all times that these processes are in operation.

D.1.11 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-2]

In order to demonstrate compliance with Conditions D.1.6, D.1.7, and D.1.8, the Permittee shall perform PM and PM10 testing for baghouse CD1 and VOC testing for the mixing and pressing processes within 60 days after achieving the maximum production, but not later than 180 days after initial startup, utilizing methods as approved by the Commissioner. PM-10 includes filterable and condensible PM-10. The PM and PM10 tests 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.

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

D.1.12 Visible Emissions Notations [40 CFR Part 64]

(a) Visible emission notations of the baghouse stack (Stack S-1) shall be performed once per shift 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 these units 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 deviation from this permit.

D.1.13 Parametric Monitoring [40 CFR Part 64]

The Permittee shall record the total static pressure drop across baghouse CD1 used in conjunction with the raw material handling, rotary screening, sizing, mixing, and pressing processes at least once per shift when these units are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 8.0 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 deviation from 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 shall be calibrated at least once every six (6) months.

D.1.14 Baghouse Inspections [40 CFR Part 64]

An inspection shall be performed each calendar quarter of all bags controlling the raw material handling, drying, sizing, mixing, and pressing processes. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.15 Broken or Failed Bag Detection [40 CFR Part 64]

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. 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 deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(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).

D.1.16 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the raw material handling, drying, sizing, mixing, and pressing processes. Inspections required by this condition shall not be performed in consecutive months.

D.1.17 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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). Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.1.18 Record Keeping Requirements

(a) To document compliance with Condition D.1.12, the Permittee shall maintain records of once per shift visible emission notations of the baghouse stack exhausts.

(b) To document compliance with Condition D.1.13, the Permittee shall maintain once per shift records of the total static pressure drop for baghouse CD1 during normal operation.

(c) To document compliance with Conditions D.1.14 and D.1.16, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.14 and D.1.16.

(d) To document compliance with Condition D.1.9, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(h) One (1) curing process, identified as EU-3, with a maximum capacity of 600 tons of the iron blocks.

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

Construction Conditions

General Construction Conditions

D.2.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.2.2 Part 70 Permit [326 IAC 2-7]

The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application.

Effective Date of the Permit

D.2.3 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

D.2.4 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.5 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

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

D.2.6 HAPs and VOC Emissions [326 IAC 2-4.1] [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT) and 326 IAC 2-4.1 (New Source Toxics Control), the Permittee shall control the VOC emissions from the curing process as follows:

(a) The VOC emissions from the curing process shall not exceed 0.75 pounds per ton of iron block.

(b) The iron block production rate shall be limited to less than 170,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.2.7 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.

Compliance Determination Requirements

D.2.8 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-2]

(a) In order to demonstrate compliance with Condition D.2.6(a), the Permittee shall perform VOC testing for the curing process within 60 days after achieving the maximum production, but not later than 180 days after initial startup, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

(b) If the binder used in the mixing process or the operating parameters are changed in such a manner that an increase in VOC emissions could result, the Permittee shall perform VOC testing for the curing process within 60 days after such change, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.6(b), the Permittee shall maintain monthly records of iron block production.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.6(b) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(b) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) One (1) storage tank for binder containing VOC, identified as Tank 2, to be constructed in 2004, with a maximum capacity of 12,683 gallons. [326 IAC 12]

(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 NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the binder storage tank 2, except when otherwise specified in 40 CFR Part 60, Subpart Kb.

D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 12-1][40 CFR 60.116b, Subpart Kb]

Pursuant to 40 CFR 60.116b, Subpart Kb (New Source Performance Standards for Volatile Organic Liquid Storage Vessels) as date July 1, 2002, the binder storage tank 2 is subject to 40 CFR 60.116b, paragraphs (a) and (b) which requires record keeping.

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

D.3.3 Record Keeping Requirements

(a) To document compliance with Condition D.3.2, the Permittee shall maintain records for the life of the source in accordance with (1) through (2) below:

(1) The dimension of the storage vessel; and

(2) An analysis showing the capacity of the storage vessel.

(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

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: OmniSource
Source Address: 12340 Elm Road, Bourbon, Indiana 46504
Mailing Address: 3101 Maumee Avenue, Fort Wayne, Indiana 46803
Part 70 Permit No.: T099-19433-00100

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: OmniSource
Source Address: 12340 Elm Road, Bourbon, Indiana 46504
Mailing Address: 3101 Maumee Avenue, Fort Wayne, Indiana 46803
Part 70 Permit No.: T099-19433-00100

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

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: OmniSource
Source Address: 12340 Elm Road, Bourbon, Indiana 46504
Mailing Address: 3101 Maumee Avenue, Fort Wayne, Indiana 46803
Part 70 Permit No.: T099-19433-00100
Facility: Curing Process
Parameter: Iron Block Production Rate
Limit: Less than 170,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR:

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: OmniSource
Source Address: 12340 Elm Road, Bourbon, Indiana 46504
Mailing Address: 3101 Maumee Avenue, Fort Wayne, Indiana 46803
Part 70 Permit No.: T099-19433-00100

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

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

Page 2 of 2

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

OmniSource
3101 Maumee Avenue
Fort Wayne, Indiana 46803

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____,I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____ .
(Company Name)

4. I hereby certify that OmniSource, 12340 Elm Road, Bourbon, Indiana 46504, completed construction of an iron block production plant on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on July 30, 2004 and as permitted pursuant to T099-19433-00100 issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____ .

My Commission expires:

Signature

Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Part 70 Operating Permit

Source Background and Description

Source Name:	OmniSource
Source Location:	12340 Elm Road, Bourbon, Indiana 46504
County:	Marshall
SIC Code:	5093
Operation Permit No.:	T099-19433-00100
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed an application from OmniSource relating to the construction and operation of an iron block production plant.

Permitted Emission Units and Pollution Control Equipment

There are no permitted emissions units or control equipment at this source.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

The source will consist of the following new emission units and pollution control equipment constructed in 2004:

(a) One (1) overs (big iron scraps) handling process, with a maximum throughput rate of 42 tons of fines per hour, controlled by cyclone C-1 and baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) feeding hopper, with a maximum throughput rate of 12 tons of overs per hour.

(2) One (1) oscillating feed conveyor, with a maximum throughput rate of 12 tons of overs per hour.

(3) One (1) crusher, with a maximum throughput rate of 12 tons of overs per hour.

(4) Two (2) conveyors, each with a maximum throughput rate of 12 tons of overs per hour.

(5) One (1) screen, with a maximum throughput rate of 30 tons of overs per hour.

(b) One (1) fines (small iron scraps) handling feeding process, with a maximum throughput rate of 50 tons of fines per hour, controlled by cyclone C-1 and baghouse BH1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) hopper with a bar grate screen.

(2) One (1) screw conveyor.

(3) One (1) covered conveyor with belt scale.

(4) One (1) oscillating feed conveyor.

(5) Two (2) surge hoppers.

(6) One (1) covered pocket conveyor.

(c) One (1) drying process, with a maximum throughput rate of 60 tons of iron scrap (both overs and fines) per hour, controlled by cyclone C-1 and baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) covered conveyor.

(2) One (1) oscillating conveyor.

(3) One (1) rotary air dryer.

(d) One (1) coke breeze handling process, with a maximum throughput rate of 30 tons of coke breeze per hour, controlled by cyclone C-1 and baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) screen.

(2) One (1) covered conveyor.

(3) One (1) surge hopper.

(4) One (1) coke storage silo.

(e) One (1) sizing process, with a maximum throughput rate of 51.9 tons of iron scrap per hour, controlled by cyclone C-1 and baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) screen.

(2) One (1) covered oscillating conveyor, with a maximum throughput rate of 38 tons of iron scrap per hour.

(3) One (1) conveyor, with a maximum throughput rate of 8 tons of iron scrap per hour.

(4) Seven (7) covered pocket conveyors, each with a maximum throughput rate of 38 tons of iron scrap per hour.

(5) Seven (7) surge hoppers.

(6) Seven (7) silos for sized iron scraps.

(7) Two (2) covered conveyors.

(8) One (1) non-ferrous hopper.

(9) One (1) screw conveyor.

(10) One (1) hopper for the recycled material.

(f) One (1) mixing process, with a maximum throughput rate of 55 tons/hr, controlled by cyclone C-1 and baghouse CD1, and exhausting through stack S-1. This unit is used to mix the iron scraps, coke breeze, and binders.

(g) One (1) pressing operation, identified as EU-2, with a maximum throughput rate of 50 tons/hr, used to press the iron scrap mixture into iron blocks, controlled by cyclone C-1 and baghouse CD1, and exhausting through stack S-1.

(h) One (1) curing process, identified as EU-3, with a maximum capacity of 600 tons of the iron blocks.

Insignificant Activities

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

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

(b) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) One (1) storage tank for binder containing VOC, identified as Tank 2, to be constructed in 2004, with a maximum capacity of 12,683 gallons. [326 IAC 12]

(2) One (1) storage tank for non-VOC binder, identified as Tank 1, to be constructed in 2004, with a maximum capacity of 45,659 gallons.

(3) Indoor storage piles, including the following: [326 IAC 6-4]

(A) Scrap and sludge storage piles, with a total maximum throughput rate of 240 tons per day.

(B) Overs storage piles, with a total maximum throughput rate of 96 tons per day.

(C) Fines storage piles, with a total maximum throughput rate of 50 tons per day.

(D) Coke breeze storage piles, with a total maximum throughput rate of 28 per day.

(E) One (1) sand pile, with a maximum throughput rate of 52 tons per day.

Existing Approvals

This is the first air approval issued to this source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^{o}F)
S-1	Baghouse CD1	25	TBD	40,000	68-72

Recommendation

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

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

An application for the purposes of this review was received on July 30, 2004. Additional information was received on August 30, 2004, September 13, 2004, September 14, 2004, and September 24, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 3).

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	Greater than 250
PM10	Greater than 250
SO_2	--
VOC	164
CO	--
NO_x	--

HAPs	Potential to Emit (tons/yr)
Methanol	164
Total	164

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 and VOC are greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of a single HAP is greater than than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile

organic compound (VOC) emissions are not counted toward determination of PSD or nonattainment new source review applicability.

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Marshall County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD or nonattainment new source review.

Source Status

New Source PSD Definition (based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	Less than 45.1
PM-10	Less than 45.1
SO_2	--
VOC	Less than 63.8
CO	--
NO_x	--
A Single HAP	Less than 63.8
Combination HAPs	Less than 63.8

(a) This new source is not a PSD major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(b) These emissions are based on the potential to emit of this source (see Appendix A).

Part 70 Permit Conditions

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

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit.

(b) The coke handling operation is not subject to the requirements of the New Source Performance Standard for Coal Preparation Plants (326 IAC 12, 40 CFR 60.250 - 60.254, Subpart Y). The coke breeze used at this source is not considered coal.

(c) The New Source Performance Standards (NSPS) for Metallic Mineral Processing Plants (326 IAC 12, 40 CFR 60.380-386, Subpart LL) are not applicable because this source does not produce metallic mineral concentrates from ore. The raw materials used at this source are recycled iron scraps and coke.

(d) The New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing Plants (326 IAC 12, 40 CFR 60.670-676, Subpart OOO) are not applicable. Coke does not meet the definition of “nonmetallic mineral” in 40 CFR 60.671.

(e) The New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (40 CFR 60.110b - 117b, Subpart Kb) are not applicable to the tanks at this source. Tank 1 does not store VOC containing liquid. Tank 2, which is used to store the VOC binder, has a capacity less than 75 cubic meters (19,813 gallons).

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

(g) The National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries (40 CFR 63.7680 - 7765, Subpart EEEEE) are not applicable. This source is not an iron or steel foundry.

(h) The National Emission Standards for Hazardous Air Pollutants for Integrated Iron and Steel Manufacturing Facilities (40 CFR 63.7780 - 7765, Subpart FFFFF) are not applicable. This source does not produce steel.

(i) This Part 70 permit does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for PM10:

(1) with the potential to emit before controls equal to or greater than the major source threshold for PM10;

(2) that is subject to an emission limitation or standard for PM10; and

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

Therefore, the requirements of 40 CFR Part 64 – Compliance Assurance Monitoring (CAM) are applicable to the baghouse CD1, which is used to control the PM10 emissions from the material handling, drying, sizing, mixing, and pressing processes. The CAM

requirements include once per shift visible emission notations, once per shift pressure drop monitoring, and quartely baghouse inspections.

State Rule Applicability – Entire Source

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

The source will be constructed in 2004. The source is not in 1 of 28 source categories as defined in 326 IAC 2-2-1(y)(1) and the potential to emit PM and PM10 from the entire source before control is greater than 250 tons/yr.

In order to make the requirement of 326 IAC 2-2 (PSD) not applicable, the Permittee agreed to limit PM/PM10 emissions from baghouse CD1, which is used to control particulate emissions from the material handling, drying, sizing, mixing, and pressing processes, to less than 10.3 lbs/hr. This is equivalent to 45.1 tons/yr of PM/PM10 emissions.

Combined with the PM/PM10 emissions from the insignificant activities, the PM/PM10 emissions from the entire source are limited to less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

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

This source will be constructed after July 27, 1997 and the potential to emit HAPs from the curing process at this source is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for total HAPs. Therefore, this source is subject to the requirements of 326 IAC 2-4.1 and is required to control the HAP emissions with Maximum Achievable Control Technology (MACT). The MACT for the curing process at this source has been determined to be the same as the Best Available Control Technology (BACT) for this process. See the discussion for the State Rule Applicable – 326 IAC 8-1-6 for specific BACT requirements.

326 IAC 2-6 (Emission Reporting)

This source is located in Marshall County and is required to have an operating permit under 326 IAC 2-7. Since the potential to emit VOC and PM10 of this source is each limited to less than 250 tons/yr, the Permittee shall submit an emission statement triennially by July 1, starting in 2007, pursuant to 326 IAC 2-6-3(b)(1).

326 IAC 5-1 (Opacity Limitations)

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

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

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

State Rule Applicability – Material Handling, Drying, Sizing, Mixing, and Pressing Processes

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

Pursuant to 326 IAC 6-3-2, particulate emissions from each of the following operations shall not exceed the pound per hour limit listed in the table below:

Unit Description	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Overs Handling Process	42.0	43.0
Fines Handling Process	50.0	44.6
Drying Process	60.0	46.3

Unit Description	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Coke Breeze Handling Process	30.0	40.0
Sizing Process	51.9	44.9
Mixing Process	55.0	45.5
Pressing	50.0	44.6

The pounds per hour limitations were calculated using one of the following equations:

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

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

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

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

The use of cyclone C-1 and baghouse CD1 with these processes ensures compliance with these limits above.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The Permittee stated that the VOC emissions from the mixing and pressing processes are negligible because the VOC emissions are from the delayed reaction between the two parts binder. The Permittee estimated that the VOC emissions from each of the mixing and the pressing processes are less than 0.23 lbs/hr, which is equivalent to 1.0 ton/yr of VOC emissions. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable to the mixing and pressing processes at this source. The Permittee will perform stack tests to demonstrate compliance with this VOC emission limit.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

This source does not perform surface coating to any of the processes listed in 326 IAC 8-2-9(a) and is not under the SIC code of major groups #33 through #39. Therefore, the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are not applicable.

State Rule Applicability – Curing Process (EU-3)

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The curing process at this source will be constructed after January 1, 1980 and has potential VOC emissions greater than 25 tons per year. In addition, there are no other rules in 326 IAC 8 applicable to this process. Therefore, the curing process is subject to 326 IAC 8-1-6 and the Permittee is required to control VOC emissions with the Best Available Control Technologies (BACT). According to the BACT analysis in Appendix B, BACT for this process has been determined to be the following:

(a) The VOC emissions from the curing process shall not exceed 0.75 pounds per ton of iron block.

(b) The iron block production rate shall be limited to less than 170,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Combined with the VOC emission limit of 0.75 lbs/ton, this is equivalent to 63.75 tons/yr of VOC emissions.

State Rule Applicability – Storage Tanks (Insignificant)

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source is not located in Clark, Floyd, Lake, or Porter County. Therefore, the requirements of 326 IAC 8-9 are not applicable to the storage tanks at this source.

326 IAC 12 (NSPS Requirements)

The binder storage tank 1 will not store VOC containing liquids. The binder storage tank 2 at this source has a capacity greater than 40 cubic meters (10,567 gallons) and will be used to store VOC containing materials. Therefore, storage tank 2 is subject to the requirements of New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (326 IAC 12, 40 CFR 60.110b - 117b, Subpart Kb as of date July 1, 2002).

Pursuant to 40 CFR 60.116b(b) as date July 1, 2002, the Permitee shall keep readily accessible records of the following for the life time of the source for Tank 2:

(a) The dimension of the storage vessel; and

(b) An analysis showing the capacity of the storage vessel.

State Rule Applicability – Paved Roads and Storage Piles (Insignificant)

326 IAC 6-4 (Fugitive Dust Emissions)

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

Testing Requirements

In order to demonstrate compliance with the 326 IAC 2-2 (PSD minor limits), 326 IAC 2-4.1 (MACT), and 326 IAC 8-1-6 (BACT), the Permittee shall perform the following emission tests:

(a) PM and PM10 from baghouse stack S-1.

(b) VOC for the mixing, pressing, and curing processes.

These tests shall be performed within 60 days after achieving the maximum production but not later than 180 days after initial startup of this iron block production plant. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

Compliance Requirements

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

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

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

1. The material handling, drying, sizing, mixing, and pressing processes have applicable compliance monitoring conditions as specified below. These units are controlled by cyclone C-1 and baghouse CD1.

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

   (b) The Permittee shall record the total static pressure drop across the baghouse CD1 at least once per shift when the material handling, sizing, drying, mixing, and pressing processes are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 to 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

   (c) An inspection shall be performed each calendar quarter of baghouse CD1 which is used to control the material handling, drying, sizing, mixing, and pressing processes. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced. In the event that bag failure has been observed:

      (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. 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. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

      (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies

as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit.

(d) An inspection shall be performed each calendar quarter of cyclone C1, which is used to control the material handling, drying, sizing, mixing, and pressing processes. Inspections required by this condition shall not be performed in consecutive months. In the event that cyclone failure has been observed, 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). Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because cyclone C-1 and baghouse CD1 must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), and CAM requirement (40 CFR Part 64).

Conclusion

The construction and operation of the iron block production plant shall be subject to the conditions of this Part 70 Permit 099-19433-00100.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for a New Source Construction and Part 70 Operating Permit

Source Background and Description

Source Name:	OmniSource
Source Location:	12340 Elm Road, Bourbon, Indiana 46504
County:	Marshall
SIC Code:	5093
Operation Permit No.:	T099-19433-00100
Permit Reviewer:	ERG/YC

On November 30, 2004, the Office of Air Quality (OAQ) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that OmniSource had applied for a Part 70 Operating Permit to construct and operate an iron block production plant with control. The notice also stated that OAQ proposed to issue a permit 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 December 29, 2004, OmniSource Corporation submitted comments on the proposed Part 70 permit. The summary of the comments is as follows (bolded language has been added, the language with a line through it has been deleted):

Comment 1:

Condition A.2 – Emission Units. The Permittee requested the facility be described as a material handling facility controlled by a baghouse. The Permittee stated that the description included in the draft permit increases the opportunity for error and decreases operational flexibility. The Permittee requested the emission unit descriptions be revised as follows:

(a) A material handling operation identified as EU-1 consisting of storage bins, a crusher, conveyors, hoppers, and screens, with a capacity of 60 tons per hour controlled by two (2) cyclones identified as C-1 and C-2, followed by a dust collector identified as CD-1 and exhausting through stack S-1.

(b) One (1) mixing and pressing process, identified as EU-2 with a maximum throughput rate of 60 tons/hr. This process is uncontrolled.

The Permittee indicated that there are no PM emissions associated with the mixing and pressing processes, since these processes involve moist materials. The Permittee also provided a modified list of the individual components of the material handling system as follows due to the changes in the design plan:

(a) One (1) overs (big iron scraps) handling process, with a maximum throughput rate of ~~42~~ **12** tons of fines per hour, controlled by cyclone ~~C-1~~ **C-2** and baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) feeding hopper, with a maximum throughput rate of 12 tons of overs per hour.

(2) One (1) oscillating feed conveyor, with a maximum throughput rate of 12 tons of overs per hour.

(3) One (1) crusher, with a maximum throughput rate of 12 tons of overs per hour.

(4) ~~Two (2)~~ **Three (3)** conveyors, each with a maximum throughput rate of 12 tons of overs per hour.

~~(5) One (1) screen, with a maximum throughput rate of 30 tons of overs per hour.~~

(b) One (1) fines (small iron scraps) handling feeding process, with a maximum throughput rate of 50 tons of fines per hour, controlled by cyclone ~~C-1~~ **C-2** and baghouse ~~BH1~~ **CD1**, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) hopper with a bar grate screen.

(2) One (1) screw conveyor.

~~(3) One (1) covered conveyor with belt scale.~~

~~(4)~~**(3)** One (1) oscillating feed conveyor.

~~(5) Two (2) surge hoppers.~~

~~(6) One (1) covered pocket conveyor.~~

(4) One (1) magnetic drum separator.

(5) One (1) screen, with a maximum throughput rate of 20 tons of fines per hour.

(6) Three (3) conveyors.

(7) One (1) bucket elevator conveyor.

(8) Two (2) screw conveyors.

(9) Two (2) fines storage silos.

(c) One (1) ~~drying~~ **rotary screening** process, with a maximum throughput rate of 60 tons of iron scrap (both overs and fines) per hour, controlled by cyclone C-1 and baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

~~(1) One (1) covered conveyor.~~

~~(2) One (1) oscillating conveyor.~~

~~(3) One (1) rotary air dryer.~~

(1) One (1) feeding hopper, with a maximum throughput rate of 30 tons per hour.

(2) One (1) oscillating feed conveyor, with a maximum throughput rate of 30 tons per hour.

(3) One (1) rotary screen.

(4) Two (2) conveyors.

(5) One (1) vibrating screen.

(6) Six (6) oscillating conveyors.

(d) One (1) coke breeze handling process, with a maximum throughput rate of 30 tons of coke breeze per hour, controlled by cyclone ~~C-1~~ **C-2** and baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

~~(1) One (1) screen.~~

~~(2) One (1) covered conveyor.~~

~~(3) One (1) surge hopper.~~

~~(4) One (1) coke storage silo.~~

(1) One (1) feeding hopper, with a maximum throughput rate of 30 tons per hour.

(2) One (1) oscillating feed conveyor, with a maximum throughput rate of 30 tons per hour.

(3) One (1) vibrating screen.

(4) Two (2) conveyors.

(5) One (1) coke storage silo.

(e) One (1) sizing process, with a maximum throughput rate of 51.9 tons of iron scrap per hour, controlled by cyclone ~~C-1~~ **C-2** and baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

~~(1) One (1) screen.~~

~~(2) One (1) covered oscillating conveyor, with a maximum throughput rate of 38 tons of iron scrap per hour.~~

~~(3) One (1) conveyor, with a maximum throughput rate of 8 tons of iron scrap per hour.~~

~~(4) Seven (7) covered pocket conveyors, each with a maximum throughput rate of 38 tons of iron scrap per hour.~~

~~(5) Seven (7) surge hoppers.~~

~~(6) Seven (7) silos for sized iron scraps.~~

~~(7) Two (2) covered conveyors.~~

~~(8) One (1) non-ferrous hopper.~~

~~(9) One (1) screw conveyor.~~

~~(10) One (1) hopper for the recycled material.~~

(1) Seven (7) screw conveyors.

(2) Four (4) bucket elevator conveyors.

(3) Four (4) silos for sized iron material.

(4) One (1) traveling hopper for sized iron material.

(5) One (1) conveyor for sized iron material.

(6) One (1) conveyor for oversized iron scraps.

(7) Two (2) conveyors for recycled iron material

Response to Comment 1:

The number of units stated in the emission units descriptions in A.2 is not part of an enforceable condition and are not emission limitations in the Title V Operating Permit. The descriptions are used by IDEM to calculate the source's potential to emit and determine to applicability of State and Federal rules. The descriptions are also designed to provide the general public with information concerning the type and size of operations conducted at the plant. The process specific emission limitations identified in Section D of the permit are often determined from this information. Physical changes or changes in the method of operation that change the capacity may also increase the emission unit's potential to emit and/or change the applicability of a State or Federal rule. Documenting the capacity and the number of the units will assist both the Permittee and the IDEM in evaluating whether such a change requires a preconstruction permit or other approval. IDEM, OAQ believes that the generalized description proposed by the Permittee does not provide sufficient descriptive information for these purposes.

Since the design plan of this new source has been slightly modified, the unit descriptions in Condition A.2 have been revised as follows. The unit descriptions in Section D.1 have been revised accordingly and all the descriptions of air drying process have been replaced with rotary screening process. According to Comment 7, the cyclones at this source will be used to capture large sizes of materials to be returned to the process. Therefore, the cyclones are not considered control devices and the unit descriptions related to the cyclones have been revised also. These changes will not affect the potential to emit of the material handling process because the potential to emit was computed using the baghouse parameters.

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

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

(a) One (1) overs (big iron scraps) handling process, with a maximum throughput rate of ~~42~~ **12** tons of fines per hour, ~~controlled by~~ **equipped with** cyclone ~~C-1~~ **C-2** and **controlled by** baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) feeding hopper, with a maximum throughput rate of 12 tons of overs per hour.

(2) One (1) oscillating feed conveyor, with a maximum throughput rate of 12 tons of overs per hour.

(3) One (1) crusher, with a maximum throughput rate of 12 tons of overs per hour.

(4) ~~Two (2)~~ **Three (3)** conveyors, each with a maximum throughput rate of 12 tons of overs per hour.

~~(5) One (1) screen, with a maximum throughput rate of 30 tons of overs per hour.~~

(b) One (1) fines (small iron scraps) handling feeding process, with a maximum throughput rate of 50 tons of fines per hour, ~~controlled by~~ **equipped with** cyclone ~~C-1~~ **C-2** and

controlled by baghouse ~~BH1~~ **CD1**, and exhausting through stack S-1. This process includes the following emission units:

(1) One (1) hopper with a bar grate screen.

(2) One (1) screen conveyor.

~~(3) One (1) covered conveyor with belt scale.~~

~~(4)~~**(3)** One (1) oscillating feed conveyor.

~~(5) Two (2) surge hoppers.~~

~~(6) One (1) covered pocket conveyor.~~

(4) One (1) magnetic drum separator.

(5) One (1) screen, with a maximum throughput rate of 20 tons of fines per hour.

(6) Three (3) conveyors.

(7) One (1) bucket elevator conveyor.

(8) Two (2) screw conveyors.

(9) Two (2) fines storage silos.

(c) One (1) ~~drying~~ **rotary screening** process, with a maximum throughput rate of 60 tons of iron scrap (both overs and fines) per hour, ~~controlled by~~ **equipped with** cyclone C-1 and **controlled by** baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

~~(1) One (1) covered conveyor.~~

~~(2) One (1) oscillating conveyor.~~

~~(3) One (1) rotary air dryer.~~

(1) One (1) feeding hopper, with a maximum throughput rate of 30 tons per hour.

(2) One (1) oscillating feed conveyor, with a maximum throughput rate of 30 tons per hour.

(3) One (1) rotary screen.

(4) Two (2) conveyors.

(5) One (1) vibrating screen.

(6) Six (6) oscillating conveyors.

(d) One (1) coke breeze handling process, with a maximum throughput rate of 30 tons of coke breeze per hour, ~~controlled by~~ **equipped with** cyclone ~~C-1~~ **C-2** and **controlled by** baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

~~(1) One (1) screen.~~

~~(2) One (1) covered conveyor.~~

~~(3) One (1) surge hopper.~~

~~(4) One (1) coke storage silo.~~

(1) One (1) feeding hopper, with a maximum throughput rate of 30 tons per hour.

(2) One oscillating feed conveyor, with a maximum throughput rate of 30 tons per hour.

(3) One (1) vibrating screen.

(4) Two (2) conveyors.

(5) One (1) coke storage silo.

(e) One (1) sizing process, with a maximum throughput rate of 51.9 tons of iron scrap per hour, ~~controlled by~~ **equipped with** cyclone ~~C-1~~ **C-2** and **controlled by** baghouse CD1, and exhausting through stack S-1. This process includes the following emission units:

~~(1) One (1) screen.~~

~~(2) One (1) covered oscillating conveyor, with a maximum throughput rate of 38 tons of iron scrap per hour.~~

~~(3) One (1) conveyor, with a maximum throughput rate of 8 tons of iron scrap per hour.~~

~~(4) Seven (7) covered pocket conveyors, each with a maximum throughput rate of 38 tons of iron scrap per hour.~~

~~(5) Seven (7) surge hoppers.~~

~~(6) Seven (7) silos for sized iron scraps.~~

~~(7) Two (2) covered conveyors.~~

~~(8) One (1) non-ferrous hopper.~~

~~(9) One (1) screw conveyor.~~

~~(10) One (1) hopper for the recycled material.~~

(1) Seven (7) screw conveyors.

(2) Four (4) bucket elevator conveyors.

(3) Four (4) silos for sized iron material.

(4) One (1) traveling hopper for sized iron material.

(5) One (1) conveyor for sized iron material.

(6) One (1) conveyor for oversized iron scraps.

(7) Two (2) conveyors for recycled iron material.

. . .

D.1.6 PM and PM10 Emissions [326 IAC 2-2]

The PM/PM10 emissions from baghouse CD1, which is used to control the material handling, ~~drying~~ **rotary screening**, sizing, mixing, and pressing processes, shall be limited to less than 10.3 lbs/hr.

. . .

D.1.13 Parametric Monitoring [40 CFR Part 64]

The Permittee shall record the total static pressure drop across baghouse CD1 used in conjunction with the raw material handling, ~~drying~~, **rotary screening**, sizing, mixing, and pressing processes at least once per shift when these units are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 8.0 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 deviation from this permit.

. . . .

Since the potential to emit from these material handling processes were calculated based on the maximum flow rate and the outlet grain loading of the control device (baghouse CD1), the changes in the number of emission units will not affect the total potential to emit of these material handling processes. However, the changes in the maximum throughput rate for the overs handling process (which changed from 42 tons/hr to 12 tons/hr) will affect the particulate emission limitation established for this process in Condition D.1.7, pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for manufacturing Processes). The pounds per hour particulate emission limits calculated using the equation in Condition D.1.7 is 21.7 lbs/hr when the maximum throughput rate is 12 tons/hr. Therefore, Condition D.1.7 has been revised as follows:

D.1.7 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following processes shall not exceed the pound per hour limit listed in the table below:

Unit Description	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Overs Handling Process	~~42.0~~ **12.0**	~~43.0~~ **21.7**
Fines Handling Process	50.0	44.6
~~Drying~~ **Rotary Screening** Process	60.0	46.3
Coke Breeze Handling Process	30.0	40.0
Sizing Process	51.9	44.9
Mixing Process	55.0	45.5
Pressing	50.0	44.6

. . .

Comment 2:

Condition D.1.6 - PM and PM10 Emissions. The Permittee requested Condition D.1.6 be deleted. The Permittee stated that there is no regulatory authority for this condition to limit the PM/PM10 emissions from the baghouse to less than 10.3 lbs/hr, which is equivalent to 45.1 tons/yr. The Permittee stated that the limitations in Condition D.1.7 should be sufficient to limit PM and PM10 emissions to less than the PSD thresholds.

Response to Comment 2:

The PM/PM10 emission limit of 10.3 lbs/hr was established based on the maximum flow rate and the outlet grain loading of the baghouse CD1. Therefore, it is not possible that the PM/PM10 emissions from baghouse CD1 will exceed 10.3 lbs/hr. Baghouse CD1 will be used to control all the emission units of the iron scraps and coke handling processes and there are no reliable emission factors in AP-42 for these emission units. Therefore, IDEM, OAQ believes that the PM/PM10 emission limits derived from the baghouse design parameters are reasonable emission limits.

The potential to emit of PM and PM10 from the entire source before control is greater than 250 tons/yr. The total allowable particulate emission limits in Condition D.1.7 also exceeds 250 tons/yr. In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, it is necessary to include PSD minor limits for PM and PM10, as established in Condition D.1.6, to limit the PM/PM10 emissions from the entire source to less than 250 tons/yr. Therefore, no change has been made as a result of this comment.

Comment 3:

Condition D.1.7- Particulate Emission Limitations. The Permittee stated that the material handling system should be treated as a single system, rather than separate components. As such, they believe that there should be a single emission limit for a 60 tons/hr material handling process. The process weight limit for the material handling system would be 46.3 lbs/hr of PM. The Permittee requested that the table in Condition D.1.7 be deleted, and replaced with a limit of 46.3 lbs/hr for the entire system. Compliance would be demonstrated at stack S-1.

The Permittee also indicated that a limit of 46.3 lbs/hr is equivalent to an annual limit of 202.8 tons/yr, and that PM10 emissions from the dust collector would be equal to or greater than the PM emissions. The Permittee stated that the process weight limit in this condition is sufficient to ensure that emissions are limited to less than the major source thresholds under the PSD rules, and therefore the PSD rules would not apply.

Response to Comment 3:

The particulate emission limitations in 326 IAC 6-3-2 apply to every manufacturing process. As defined in 326 IAC 6-3-1.5(2), manufacturing process means any single or series of actions, operations, or treatments in which a mechanical, physical, or chemical transformation of material occurs that emits, or has the potential to emit, particulate in the production of the product. IDEM, OAQ does not believe that all the material handling processes at this source are in series and as a result should not be considered a single manufacturing process. Although the entire production facility should not be considered a single process for purposes of 326 IAC 6-3, each individual material handling process (such as overs handling process or fines handling process), which consists of several emission units (such as conveyors and hoppers), should be considered a single manufacturing process since the facilities are operated in series. Therefore, the particulate emission limitations in 326 IAC 6-3-2 shall apply to each process line as stated in the draft permit.

As stated in the response to Comment 2, particulate emissions are not equivalent to PM or PM10 emissions. In order to be a PSD minor source, PSD minor limitations for PM and PM10 in Condition D.1.6 are necessary for this source. Therefore, no change has been made as a result of this comment.

Comment 4:

Condition D.1.8 - VOC Emissions. The Permittee requested this condition be removed as VOC emissions do not come from the pressing process. The Permittee stated that a bench study was performed of the mixing, pressing, and curing operations and the study revealed that there is a time delay in the evolution of the VOC emissions. The Permittee stated that VOC's will only be emitted from the curing process.

Response to Comment 4:

IDEM, OAQ acknowledges that the bench study results showed that there are no VOC emissions from the mixing and pressing processes. However, since this is a one of a kind operation and for which no IDEM approved performance test data is available, IDEM, OAQ believes that it is necessary to perform a VOC performance test to verify that the VOC emissions from the mixing and pressing processes are negligible and the requirements of 326 IAC 8-1-6 (BACT) are not applicable to these units. Condition D.1.8 establishes BACT limits for the VOC emissions from each of the mixing and the pressing processes to less than 0.23 lbs/hr, which is equivalent to 1.0 ton per year of VOC emissions. Therefore, no change has been made as a result of this comment.

Comment 5:

Condition D.1.10 - PM and PM10 Emission Control. The Permittee stated that a second cyclone has been added to the process as stated in Comment 1.

Response to Comment 5:

Condition D.1.10 has been revised as follows:

D.1.10 PM and PM10 Emission Control

In order to comply with Conditions D.1.6 and D.1.7, cyclone C-1, **cyclone C-2,** and baghouse CD1 for particulate control shall be in operation and control emissions from the raw material handling, ~~drying~~ **rotary screening**, sizing, mixing, and pressing processes at all times that these processes are in operation.

Comment 6:

Condition D.1.11- Testing Requirements. The Permittee stated that the testing required for the material handling, mixing, and pressing processes should be limited to PM testing of the baghouse to demonstrate compliance with the process weight limit. The requirement to stack test for VOC should be removed, since VOCs are not present in this portion of the process as stated in Comment 4.

The Permittee also stated that PM testing using EPA Method 5 should suffice because PM emissions should be greater than PM10 emissions. The Permittee stated that there should be no condensables from the material handling system.

In addition, the Permittee objected to the requirement to conduct a PM stack test at least every 5 years. They stated that a one time performance test should be sufficient because the anticipated level of control is well below the allowable limits. The Permittee stated that their actual PM emissions will be between 3 and 10 lbs/hr as compared with the allowable limit of 46.3 lbs/hour. They stated that their uncontrolled emissions may in fact comply with the allowable limit, given the use of a very conservative emission factor for this process.

Response to Comment 6:

In order to demonstrate compliance with the PM and PM10 emission limits in Condition D.1.6, it is necessary to perform both PM and PM10 emission tests. IDEM, OAQ found no evidence to believe that PM emissions are always greater than PM10 emissions and no condensable PM10 will be emitted from the material handling process at OmniSource Corporation.

The Permittee did not submit sufficient information to show that the uncontrolled PM/PM10 emissions are lower than the emission limits in the draft permit. Since the majority of the particulate emissions (more than 40%) will be emitted through the baghouse CD1, IDEM, OAQ believes the baghouse stack is a major emission point at this source and stack testing for this stack should be repeated every five (5) years to demonstrate continuous compliance with the PSD minor limits in Condition D.1.6. If the stack test results show that the actual emissions are

less than 50% of the applicable limits, the Permittee may petition for skipping one test cycle for this baghouse.

As stated in the response to Comment 4, IDEM, OAQ believes that it is necessary to perform a VOC performance test for the mixing and pressing processes to confirm that the VOC emissions from these processes either comply with the limit or are exempt from 326 IAC 8-1-6. Therefore, Condition D.1.11 has been revised as follows:

D.1.11 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-2]

In order to demonstrate compliance with Conditions D.1.6, D.1.7, and D.1.8, the Permittee shall perform PM and PM10 testing for baghouse CD1 and VOC testing for the mixing and pressing processes within 60 days after achieving the maximum production, but not later than 180 days after initial startup, utilizing methods as approved by the Commissioner. PM-10 includes filterable and condensible PM-10. The~~se~~ **PM and PM10** tests 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.

Comment 7:

Conditions D.1.16 - Cyclone Inspections and D.1.17 Cyclone Failure Detection. The Permittee requested Conditions D.1.16 and D.1.17 be removed because these conditions include compliance monitoring requirements for the cyclones. The Permittee stated that the cyclones are used to capture materials to be returned to the process and the air flow off the cyclones is directed to the baghouse for control. As such the control device is the baghouse and compliance requirements should only be included for the baghouse.

Response to Comment 7:

Although the cyclones may be integral to the associated operations, they are considered air emission control devices and should be operated properly. Therefore, the cyclone inspection and failure detection requirements are necessary to ensure proper operation of these units. No change has been made as a result of this comment.

Comment 8:

Condition D.1.18 - Record Keeping Requirements. The Permittee indicated that Condition D.1.18 references the wrong conditions. The Permittee requested that the numbers of condition referenced in this condition be amended consistent with the appropriate sections in the final permit.

Response to Comment 8:

Condition D.1.18 has been revised as follows to reflect the correct condition references:

D.1.18 Record Keeping Requirements

(a) To document compliance with Condition D.1.~~11~~**12**, the Permittee shall maintain records of once per shift visible emission notations of the baghouse stack exhausts.

(b) To document compliance with Condition D.1.~~12~~**13**, the Permittee shall maintain once per shift records of the total static pressure drop for baghouse CD1 during normal operation.

(c) To document compliance with Conditions D.1.~~13~~**14** and ~~D.1.15~~ **D.1.16**, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.~~13~~**14** and ~~D.1.15~~ **D.1.16**.

(d) To document compliance with Condition D.1.~~8~~**9**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

Comment 9:

Condition D.2.8 - Testing Requirements. The Permittee stated that testing VOC emissions from the curing process every (5) years is unnecessary because there is no control device on the system, and the emission limitation merely represents the emission factor for the process. A one time performance test to verify the emission factor in pounds of VOC per ton of iron block should suffice as a demonstration of compliance with the VOC emissions limit in D.2.6(a). The Permittee stated that they do not believe that periodic testing (every five years) serves any useful purpose and requested the requirement to conduct a VOC stack test every 5 years be removed.

Response to Comment 9:

Since the VOC emissions result from a chemical reaction that occurs during the curing process, IDEM, OAQ agrees that the VOC emission factor for the curing process should not change as long as the binder used in the mixing process and after operating remain unchanged. Therefore, the periodic VOC testing requirement for the curing process at this source has been removed. However, in order to ensure compliance with the VOC limit in Condition D.2.6(a), the Permittee shall perform a VOC stack test if the binder used in the manufacturing process or other operating parameters are changed. Therefore, Condition D.2.8 has been revised as follows:

D.2.8 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-2]

(a) In order to demonstrate compliance with Condition D.2.6(a), the Permittee shall perform VOC testing for the curing process within 60 days after achieving the maximum production, but not later than 180 days after initial startup, 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) If the binder used in the mixing process or the operating parameters are changed in such a manner that an increase in VOC emissions could result, the Permittee shall perform VOC testing for the curing process within 60 days after such change, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

Comment 10:

The Permittee stated that Section D.3 of the permit for storage tanks should be removed. The Permittee stated that 40 CFR 60, Subpart Kb and 326 IAC 12-1 are not applicable to the tank at this source. The federal regulation applies to an “affected source”, which is defined as a storage tank greater than or equal to 75 cubic meters (19,812.75 gallons). The Permittee stated that the state rule was adopted by reference, and therefore contains the same requirement. The binder storage tank has a capacity of 48 cubic meters (12,683 gallons), and therefore is not subject to the regulation.

Response to Comment 10:

IDEM, OAQ acknowledges that EPA revised the applicability thresholds for NSPS, Subpart Kb in 2003 and agrees that the binder storage tank at this source is not subject to the requirements of the revised federal rule. This was clearly documented in the technical support document for this Part 70 permit.

However, the Permittee is also required to comply with 326 IAC 12, which incorporated 40 CFR 60 by reference. Pursuant to 326 IAC 1-1-3(a), any reference to a provision of the Code of Federal Regulations (CFR) shall mean the July 1, 2002 edition. In the version of NSPS, Subpart Kb published in the CFR on July 1, 2002, the applicability threshold for storage tanks is 40 cubic meters (10,567 gallons). Therefore, the binder storage tank at this source is subject to the

recordkeeping requirement in the July 1, 2002 version of NSPS, Subpart Kb, pursuant to 326 IAC 12. Therefore, the recordkeeping requirements in NSPS, Subpart Kb are applicable to the tank at this source until such time the reference date in 326 IAC 1-1-3(a) has been revised. Therefore, no change has been made as a result of this comment.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. IDEM, OAQ has made the following correction to the unit description of the coke breeze storage piles in Condition A.3(b)(2):

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

. . . . .

(b) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

. . . .

(2) Indoor storage piles, including the following: [326 IAC 6-4]

. . .

(D) Coke breeze storage piles, with a total maximum throughput rate of 28 **tons** per day.

2. Upon further review, IDEM has decided to include the following updates to further address and clarify the permit term and the term of the conditions.

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

(a) This permit**, T099-19433-00100,** is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.15 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] **[326 IAC 2-7-8(e)]**

. . . .

(b) ~~Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]~~

~~(1)~~ A timely renewal application is one that is:

(~~A~~**1**) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(~~B~~**2**) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

~~(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.~~

(c) ~~Right to Operate After Application for Renewal [326 IAC 2-7-3]~~
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

~~(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]~~
~~If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.~~

B.24 Term of Conditions [326 IAC 2-1.1-9.5]

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

(1) The condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(2) The emission unit to which the condition pertains permanently ceases operation.

Appendix B
Best Available Control Technology (BACT) Determinations

Source Background and Description

Source Name:	OmniSource
Source Location:	12340 Elm Road, Bourbon, Indiana 46504
County:	Marshall
SIC Code:	5093
Part 70 No.:	099-19433-00100
Permit Reviewer:	ERG/YC

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has performed the following Best Available Control Technology (BACT) review the following emission unit at a new iron block production plant, owned and operated by the OmniSource, located at 12340 Elm Road, Bourbon, Indiana 46504.

(h) One (1) curing process, identified as EU-3, to be constructed in 2004, with a maximum throughput rate of 50 tons/yr and a maximum capacity of 600 tons of the iron blocks.

Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), BACT is required for all facilities constructed after January 1, 1980 that have potential VOC emissions of equal to or greater than twenty-five (25) tons per year and are not regulated by other rules in 326 IAC 8. Based on the calculations (see Appendix A) and the analysis of applicable state regulations (see State Rule Applicability section of TSD), the curing process at this source is subject to the requirements of 326 IAC 8-1-6.

IDEM, OAQ conducts BACT analyses in accordance with the *"Top-Down" Best Available Control Technology* process, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below:

(a) Identify all potentially available control options;
(b) Eliminate technically infeasible control options;
(c) Rank remaining control technologies by control effectiveness;
(d) Evaluate the most effective controls and document the results as necessary; and
(e) Select BACT.

In accordance with EPA guidance, the BACT analysis should take into account the energy, environmental, and economic impacts. Emission reductions may be achieved through the application of available control techniques, changes in process design, and/or operational limitations. These BACT determinations are based on the following information:

(a) The BACT analysis information submitted by OmniSource on July 30, 2004, August 30, 2004, September 13, 2004; and September 22, 2004;

(b) Information from vendors/suppliers;

(c) The EPA RACT/BACT/LAER (RBLC) Clearinghouse; and

(d) State and local air quality permits.

VOC BACT

OmniSource will construct and operate an iron block manufacturing plant. A two (2) parts binder will be added to the iron scrap and coke breeze mixture and the mixture will be pressed into 4"x4" iron blocks. The pressed iron blocks will be kept in a curing rack. VOC emissions (mainly methanol) are expected to be emitted from this curing process. The potential VOC emissions from the curing process are greater than 25 tons per year. Since this process is not regulated by any other rule in 326 IAC 8, the Permittee is required to control VOC emissions from this curing process with BACT, pursuant to 326 IAC 8-1-6.

The Permittee conducted a bench scale test for the curing process and the results show that the VOC emissions are about 0.5 pounds per ton of iron block produced. The Permittee proposed a production limit of 170,000 tons/yr of iron blocks and a VOC emission limit of 0.75 pounds per ton of iron block. This is equivalent to 63.75 ton/yr of VOC.

Step 1 – Identify Control Options

The following available technologies were identified and evaluated to control VOC emissions from the motor home painting operations:

(a) IDEM, OAQ and the source searched EPA's RACT/BACT/LAER Clearinghouse (RBLC) for SIC code 5093. However, no iron block making process was found in the RBLC database since this is a one of a kind operation. The similar processes include the core making process at foundries that also have VOC emissions from the binders and all the methanol emission sources. The search for the core making process in RBLC and Indiana Air Permits identified the following:

Company	PBLD ID or Permit #	Date Issued and State	Type of Operation	BACT Requirements
Waupaca Foundry, Inc.	IN-0094 (#123-12948-00019)	06/05/01 (IN)	2 Cold Box Core Machines	Acid Scrubber (98%) 0.366 lbs/ton core for VOC (2.20 lbs/hr) 0.06 lbs/ton core for TEA (0.36 lbs/hr)
Quantum Composite, Inc.	MI-0328	01/23/01	Mixers and Presses at the molding manufacturing plant	Methanol < 60 lbs/ton Throughput Rate Limit
Waupaca Foundry, Inc.	TN-0083	04/28/00 (TN)	Isocure Core Making	0.15 lbs/ton core for VOC (3 lbs/hr)
Wheland Foundry	TN-0060	11/03/98 (TN)	Core Production	RTO (98%) 2.2 lbs/ton core for VOC (22.04 lbs/hr) 1,148 tons/yr TEA usage
Waupaca Foundry, Inc.	IN-0078	02/04/98 (IN)	Core Making	Acid Scrubber (94%) 0.63 lbs/ton core for VOC (12.6 lbs/hr) 0.18 lbs/ton core for TEA (3.6 lbs/hr)
Golden Casting Corp.	IN-0094	03/12/97 (IN)	2 Cold Box Core Machines	*Wet Scrubber (95%) production limit 0.103 lbs/ton for TEA (1.34 lbs/hr)
Waupaca Foundry, Inc.	IN-0068	01/19/96 (IN)	Core Making	TEA Scrubber 0.288 lbs/ton core for VOC (4.6 lbs/hr)

(b) OmniSource also evaluated a variety of control technologies, including the following:

(1) Regenerative Thermal Oxidizer;

(2) Catalytic Incinerator;

(3) Flare;

(4) Carbon Adsorption;

(5) A concentrator with RTO;

(6) Wet scrubber; and

(7) Other binders with lower VOC emissions.

Step 2 – Eliminate Technically Infeasible Control Options

Based on the results from the RBLC database search, vendor review, and an evaluation of the control technologies, IDEM, OAQ has determined that the use of a catalytic incinerator, flare, carbon adsorption, and concentrator with RTO are not technically feasible options for this source for the following reasons:

(a) The use of catalytic incinerators is infeasible because it requires higher inlet VOC concentration (100 - 1,000 ppm). The expected VOC concentration from the curing process is less than 100 ppm. In addition, contaminants in the exhaust stream can poison or foul the carbon adsorption media.

(b) The use of flare is infeasible because it requires high inlet concentration (greater than 1,300 ppm). The expected VOC concentration from the curing process is less than 100 ppm.

(c) The use of carbon adsorption is infeasible because contaminants in the exhaust stream can poison or foul the carbon adsorption media.

(d) The use of a concentrator with a RTO is infeasible because the concentrator media does not effectively capture methanol, which is the main pollutant emitted from the curing process.

(e) The Permittee stated that the use of a wet scrubber is technically infeasible because no data is available to show that a wet scrubber is effective in controlling methanol emissions from this type of curing process.

(f) The source stated that the binder used at this source was specifically designed for the iron block making process at this source. The Permittee is not aware of any alternative binder which can be used in the block making process at this source. Therefore, the use of binder which has lower VOC emissions is infeasible.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

The remaining technically feasible approaches for controlling VOC emissions from binder usage are:

Control Technology	Control Efficiency (%)
Thermal Oxidizer	98
Emission Limit	None

Step 4 – Evaluate the Most Effective Controls and Document Results

OmniSource provided IDEM, OAQ with a thorough economic analysis of the technically feasible control options. The analysis estimated the cost of the VOC control equipment, including the initial capital cost of the various components intrinsic to the complete system, and the estimated annual operating costs. The estimated total capital cost was calculated with the use of a factoring method of determining direct and indirect installation costs. The basic equipment costs were obtained from vendor's quoted prices. Annualized costs were developed based on

information from the vendors and a literature review. The analysis assumed an interest rate of 7% and an equipment life of 10 years.

The basis of cost effectiveness, used to evaluate the control options, is the ratio of the annualized cost to the amount of VOC (tons) removed per year. Note that the cost effectiveness of each option only accounts for the portion of VOC removed by the add-on controls. The source also proposed a production limit of 170,000 tons/yr of iron blocks. Assuming a VOC emission factor of 0.75 lbs/ton, this is equivalent to 63.75 tons/yr of VOC emissions.

There are no costs associated with the emission limits. A complete breakdown of the costs associated with the Regenerative Thermal Oxidizer (RTO) is included in Appendix C. A summary of the cost figures determined in the analysis is provided in the table below:

Option	Equipment Cost	Total Operating Cost ($/yr)	Total Annualized Costs ($/yr)	Potential VOC removal (tons/yr)	Cost Effectiveness ($/ton VOC removed)
RTO with 95%	$1,024,235	$276,184	$506,088	60.6	$8,356
Emission Limits	NA	NA	NA	NA	NA

Step 5 – Select BACT

IDEM has determined the BACT for the proposed curing process as follows:

(a) The VOC emissions from the curing process shall not exceed 0.75 pounds per ton of iron block.

(b) The iron block production rate shall be limited to less than 170,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Combined with the VOC emission limit of 0.75 lbs/ton, this is equivalent to 63.75 tons/yr of VOC emissions.

This determination was based on the following reasons:

(a) The proposed emission limit of 0.75 lbs/ton, which is used in the calculations, is greater than the bench scale test result of 0.5 lbs/ton. If the stack test results confirm that the emission factor is less than 0.75 lbs/ton, the actual VOC emissions will be less than 63.75 tons/yr. Using an emission factor of 0.5 lbs/ton, the actual emissions generated for producing 170,000 tons per year of iron blocks would be 42.5 tons per year of VOC before controls and 2.13 tons per year after the RTO. The cost effectiveness would then be $12,535 per ton of VOC removed.

(b) The main VOC emitted from the curing process is methanol, which is not contained in the binders. Methanol is a product from the 2 parts binder reaction. Since this is a one of a kind operation, the actual VOC/methanol emissions are unknown without a stack test. The BACT for the curing process would need to be reexamined if the stack test results show that the actual VOC/methanol emissions are found to be greater than 0.75 lbs/ton (because the RTO may become cost effective.)

(c) With the emission limit of 63.75 tons/yr, the cost effectiveness for add-on controls is $8,356/ton.

Appendix C: Cost Analysis for Control Devices

Company Name: OmniSource
Address: 12340 Elm Road, Bourbon, IN 46504
TV: 099-19433-00100
Reviewer: ERG/YC
Date: November 9, 2004

			RTO	
Vender:			Kirk & Blum	
Design Air Flow Rate (scfm):			40,000	(provided by source)
I. Capital Cost				
	(formula)*			
1. Purchased Equipment:				
Basic Equipment & Auxiliaries (A)			$1,024,235	(provided by source)
Taxes	0.05	A	$51,212	(Ohio Tax Code)
Freight	0.05	A	$51,212	
Total Purchase Cost (B)			**$1,126,659**	
2. Direct Installation Costs:				
Foundations & Supports	0.08	B	(included)	
Erection & Handling	0.14	B	(included)	
Electrical	0.04	B	(included)	
Enclosure			$95,000	(provided by source)
Piping	0.02	B	$22,533	
Insulation	0.01	B	$11,267	
Painting	0.01	B	$11,267	
Site Preparation (As Required)			$0	
Facilities and buildings (As required)			$0	
Total Direct Installation Cost (C)			**$140,066**	
Total Direct Capital Cost (TDC)		**(B+C)**	**$1,266,725**	
3. Indirect Costs:				
Engineering	0.10	B	$112,666	
Loss of Production Cost			$0	
Construction & Field Expenses	0.05	B	$56,333	
Contractor Fees	0.10	B	$112,666	
Start Up	0.02	B	$22,533	
Performance Tests			$10,000	(provided by source)
Contingencies	0.03	B	$33,800	
Total Indirect Cost (D)			**$347,998**	
Total Install Capital Cost		**(B+C+D)**	**$1,614,722**	
Capital Recovery Factor (7%, 10 year)			0.14238	
Capital Recovery Cost (E)			**$229,904**	

II. ANNUALIZED COSTS

1. Direct Operating Costs:				
Operating Labor (F)			$9,198	
a. Number of Employees			*1*	
*b. Cost/Employee/Hour *****			*$16.8*	
c. Operating Hours/Year			*547.5*	
Supervisory Labor (F1)	0.15	F	$1,380	
Maintenance Labor (F2)			$14,016	
a. Number of Employees			*1*	
*b. Cost/Employee/Hour *****			*$25.6*	
c. Operating Hours/Year			*547.5*	
Maintenance Material (F3)	1	F2	$14,016	
Utilities				
a. Natural Gas			$175,645	
MMBTU/HR Input			*3.08*	
Operating Hours/Year			*8,760*	(provided by source)
*Cost/MMBTU ****			*$6.51*	(rate in IN)
b. Electricity			$15,032	
KW Requirements/Hr			*31.2*	
KWH/YR			*8,760*	(provided by source)
*Cost/KWH ****			*$0.055*	(national ave.)
Water			$0	
Air			$0	
Replacement Parts	0.05	A	$51,212	(provided by source)
Total Direct Operating Cost (G)			**$280,499**	
2. Indirect Operating Costs:				
Overhead	0.6	(F+F1+F2+F3)	$23,166	
Insurance, and Administrative Costs	0.03	(B+C+D)	$48,442	
Total Indirect Operating Cost (H)			**$71,607**	
3. Heat Recovery Credits (I):			**$75,923**	
MMBTU/HR Input			*3.08*	
Operating Hours/Year			*8,760*	
Unit Heat Efficiency			*95%*	
Heat Exchange Efficiency			*65%*	
Percent Heat Recovery			*70%*	
*Cost/MMBTU ****			*$6.51*	
Total Annual Operating Cost		**(G+H-I)**	**$276,184**	

Total Annual Cost		**(E+G+H-I)**	**$506,088**
Uncontrolled PTE (tons/yr)	**63.75**		
Overall Control Efficiency**			**95.0%**
Pollution Removed (tons/yr)			**60.6**
Cost Effectiveness			**$8,356**

* The cost analysis formula is from EPA Air Pollution Control Cost Manual, Sixth Edition (01/02).

** This is provided by the manufacturer, including capture efficiency and destruction efficiency.

*** This is energy price for industrial use in July, 2004 from the webpage for Energy Information Administration. http://www.eia.doe.gov/

**** These are the mean hourly earnings for the full time workers in Indianapolis, IN, January 2004.

Appendix A: Emission Calculations
PM/PM10 Emissions
From the Raw Material Handling, Drying, Sizing, Mixing and Pressing Processes

Company Name: OmniSource
Address : 12340 Elm Road, Bourbon, IN 46504
TV: 099-19433-00100
Reviewer: ERG/YC
Date: September 29, 2004

Process Description:

All the raw material handling process, drying, mixing, and the pressing processes are controlled by cyclone C-1 and baghouse CD1.

Outlet Grain Loading of the Baghouse:	0.03	grains/dscf
Air Flow Rate of the Baghouse:	40,000	dscf/min
Control Efficiency of the Baghouse:	99%	

1. Potential to Emit After Control:

Assume all the PM emissions are equal to PM10 emissions.

Hourly PM/PM10 Emissions	= 0.03 (gr/dscf) x 40,000 (dscf/min) x 60 (min/hr) x 1/7000 (lb/gr) =	**10.3 lbs/hr**
Annual PM/PM10 emissions	= 10.3 lbs/hr x 8760 hr/yr x 1/2000 (ton/lbs) =	**45.1 tons/yr**

2. Potential to Emit Before Control:

PTE of PM/PM10 Before Control	= 45.1 tons/yr / (1-99% Control Efficiency) =	**4,505 tons/yr**

Appendix A: Emission Calculations
VOC/HAP Emissions
From the Curing Rack

Company Name: OmniSource
Address : 12340 Elm Road, Bourbon, IN 46504
TV: 099-19433-00100
Reviewer: ERG/YC
Date: September 29, 2004

1. Process Description:

Max. Throughput Rate:	50	tons/hr
VOC/HAP Emission Factor:	0.75	lbs/ton (provided by the source based on a bench scale test)
Production Limit:	170,000	tons/yr

Note: According to the bench scale test, all VOC emissions are Methanol Emissions.

2. Unlimited Potential to Emit:

PTE of VOC/HAP (tons/yr)	= 50 tons/hr x 0.75 lbs/ton x 8760 hr/yr x 1 tons/2000 lbs =	164.25	tons/yr

3. Limited Potential to Emit:

PTE of VOC/HAP (tons/yr)	=170,000 tons/yr x 0.75 lbs/ton x 1 tons/2000 lbs =	63.75	tons/yr

Appendix A: Emission Calculations
Fugitive Emissions From Paved Roads

Company Name: OmniSource
Address : 12340 Elm Road, Bourbon, IN 46504
TV: 099-19433-00100
Reviewer: ERG/YC
Date: September 29, 2004

1. Emission Factors: AP-42

According to AP-42, Chapter 13.2.1 - Paved Roads (12/03), the PM/PM10 emission factors for paved roads can be estimated from the following equation:

$E = (k \times (sL/2)^a \times (w/3)^b - C) \times (1 - p/(4 \times 365))$

where:

E =	emission factor (lb/vehicle mile traveled)		
sL =	road surface silt loading (g/m^2) =	0.6	(g/m^2) (AP-42, Table 13.2.1-3)
w =	mean vehicle weight (tons) =	20	tons (provided by the source)
k =	empirical constant =	0.082 for PM and 0.016 for PM10	
a =	empirical constant =	0.65	
b =	empirical constant =	1.5	
C =	emission factor for exhaust, brake and tire wear	0.00047 for PM and PM10	
p =	number of days per year with 0.01 inches precipitation	120	

PM Emission Factor = $(0.082 \times (0.6/2)^{0.65} \times (20/3)^{1.5} - 0.00047) \times (1 - 120/1460)$ = 0.59 lbs/mile

PM10 Emission Factor = $(0.016 \times (0.6/2)^{0.65} \times (20/3)^{1.5} - 0.00047) \times (1 - 120/1460)$ = 0.12 lbs/mile

2. Potential to Emit (PTE) of PM/PM10 Before Control from Paved Roads:

PTE of PM (tons/yr) = 8.5 trip/hr x 0.25 mile/trip x 2 x 8760 hr/yr x 0.59 lbs/mile x 1 tons/2000 lbs = **11.0 tons/yr**

PTE of PM10 (tons/yr) = 8.5 trip/hr x 0.25 mile/trip x 2 x 8760 hr/yr x 0.12 lbs/mile x 1 tons/2000 lbs = **2.14 tons/yr**