



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: August 26, 2005

RE: American Steel Cord, Div. of Michelin North America, Inc. / 143-21617-00008

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

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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
FN-REGIS.dot 1/10/05



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
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Mr. Gustavo Diaz
American Steel Cord, A Division of Michelin North America, Inc.
1010 West Weir Road
Scottsburg, Indiana 47170

August 26, 2005

Re: Registered Operation Status,
143-21617-00008

Dear Mr. Diaz:

The application from American Steel Cord, A Division of Michelin North America, Inc., received on July 29, 2005, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5-6, it has been determined that the following wire drawing operation located at 1010 West Weir Road, Scottsburg, IN 47170, is classified as registered:

- (a) Two (2) natural gas fired steam boilers, identified as B01 and B02, each installed in 1990 with a maximum heat input rate of 2.93 million (MM) British thermal units (Btu) per hour, and each exhausting through stacks B01 and B02.
- (b) Two (2) natural gas fired steam boilers, identified as B03 and B04, each installed in 1990 with a maximum heat input rate of 1.255 million (MM) British thermal units (Btu) per hour, and each exhausting through stacks B03 and B04.
- (c) Six (6) natural gas fired unit heaters located at RT department, identified as GUH 1-6, and each with a maximum heat input rate of 0.2 MMBtu per hour.
- (d) Five (5) natural gas fired unit heaters located at RO Department, identified as GUH 7-11, and each with a maximum heat input rate of 0.165 MMBtu per hour.
- (e) One (1) natural gas fired unit heater located at small mechanical room, identified as GUH 12, and with a maximum heat input rate of 0.05 MMBtu per hour.
- (f) Four (4) natural gas fired unit heaters used for plating line tanks, identified as GUH 13-16, and each with a maximum heat input rate of 0.130 MMBtu per hour.
- (g) Two (2) natural gas fired unit heaters located at RO department, identified as GUH 17 and 18, and each with a maximum heat input rate of 0.165 MMBtu per hour.
- (h) Six (6) natural gas fired unit heaters located at RC department, identified as GUH 19-24, and each with a maximum heat input rate of 0.3 MMBtu per hour.

- (i) Two (2) natural gas fired unit heaters located at wet lube room, identified as GUH 25 and 26, and each with a maximum heat input rate of 0.1 MMBtu per hour.
- (j) One (1) natural gas fired unit heater located at main mechanical room, identified as GUH 29, with a maximum heat input rate of 0.130 MMBtu per hour.
- (k) Six (6) natural gas fired unit heaters located at RD department, identified as GUH 30-35, each with a maximum heat input rate of 0.4 MMBtu per hour.
- (l) Two (2) natural gas fired unit heaters located at shipping department, identified as GUH 36 and 37, each with a maximum heat input rate of 0.2 and 0.1 MMBtu per hour, respectively.
- (m) Two (2) natural gas fired unit heaters, identified as GUH 38 and 39, each with a maximum heat input rate of 0.1 and 0.2 MMBtu per hour, respectively.
- (n) Eight (8) natural gas fired roof top units, identified as RTU 1-8, each with a maximum heat input rate of 0.12, 0.16, 0.16, 0.12, 0.16, 0.16, 0.079, and 0.16 MMBtu per hour, respectively.
- (o) Seven (7) natural gas fired make up air units, identified as MAU 1-7, each with a maximum heat input rate of 1.10 MMBtu per hour.
- (p) One (1) hydrochloric acid (HCl) pickling line consisting of two (2) HCl baths, with combined maximum capacity of 5,454.49 pounds per hour, identified as EU 1 and 2, equipped with a packed tower for control, and exhausting through one (1) stack identified as CE 01.
- (q) One (1) natural gas fired oven for the pickling and zinc-phosphate line, identified as DF-1, with a maximum heat input rate of 0.80 MMBtu per hour.
- (r) One (1) zinc-phosphate bath part of the HCl pickling line, identified as EU 3; four (4) sulfuric acid baths, identified as EU12 – 14, and equipped with packed tower brassing scrubber for control; four (4) Copper plating baths, identified as EU 20 – 23; four (4) zinc plating baths, identified as EU 24 – 27; and four (4) sodium hydroxide bath, identified as EU 16 – EU19.
- (s) Eight (8) dry draw lines, identified as EU 4 – 11, with combined processing capacity of 2.73 tons of wire per hour.
- (t) Two (2) natural gas fired plating lines, identified as PF-1 and PF-2, each with a maximum heat input rate of 2.56 MMBtu per hour.
- (u) Eighty (80) wet drawing machines, identified as EU 30 – 109.
- (v) Two (2) natural gas fired pressurized fluidized beds, identified as FBP-1 and FBP-2, each with a maximum heat input rating of 2.78 MMBtu per hour, and equipped with an inertial separator for control.
- (w) Two (2) natural gas fired diffusion fluidized beds, identified as FBD-1 and FBD-2, each with a maximum heat input rating of 2.78 MMBtu per hour, and equipped with an inertial separator for control.
- (x) Three (3) storage tanks identified as EU 111, 112 and 113 (storing new hydrochloric acid, spent hydrochloric acid, and zinc-phosphate solution, respectively), each with maximum storage capacity of 6,000 gallons.
- (y) Two (2) storage tanks identified as EU 114 and 124 (storing sodium hydroxide), each with a maximum storage capacity of 5,640 and 1,450 gallons, respectively.

- (z) Two (2) storage tanks identified as EU 115 and 116 (storing sulfuric acid), each with a maximum storage capacity of 4,885 and 1,000 gallons, respectively.
- (aa) Three (3) storage tanks identified as EU 118, 119 and 126 (storing Copper), each with a maximum storage capacity of 3,700, 1,050, and 1,000 gallons, respectively.
- (bb) Two (2) storage tanks identified as EU120 and 121 (storing Zinc), each with a maximum storage capacity of 725 and 1,500 gallons, respectively.
- (cc) Two (2) storage tanks identified as EU 122 and EU 126 (storing spent acid and copper, respectively), with a maximum storage capacity of 4,500 and 1,000 gallons, respectively.
- (dd) Two (2) phosphoric acid baths, identified as EU28 and 29.
- (ee) Two (2) storage tanks identified as EU 123 and 125 (storing spent acid and spent sodium hydroxide, respectively), each with a maximum storage capacity of 6,000 and 7,000 gallons, respectively.
- (ff) Two (2) natural gas fired roof top units, identified as RTU 9 and 10, each with a maximum heat input rate of 0.825 and 0.25 MMBtu per hour, respectively.
- (gg) One (1) scrap metal torching operation identified as EU 110, with a maximum process weight rate of 0.35 tons per hour.

The following conditions shall be applicable:

- (a) 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:
 - (1) 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.
 - (2) 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.
- (b) Pursuant to 326 IAC 6-3-2 (Process Emissions Limitations from Manufacturing Processes):
 - (1) The allowable particulate emission rate from the dry draw lines (EU 4 through EU 11) shall not exceed 8.035 pounds per hour when operating at a process weight rate of 2.73 tons per hour.
 - (2) The allowable particulate emission rate from the scrap metal torching (EU 110) shall not exceed 2.03 pounds per hour when operating at a process weight rate of 0.35 tons per hour.

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

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

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

This registration supersedes any previous air approvals issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3)). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by
Nysa L. James, Section Chief
Permits Branch
Office of Air Quality

AY/EVP

cc: File - Scott County
Scott County Health Department
Air Compliance Inspector – Jennifer Schick
Permit Tracking
Technical Support and Modeling

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	American Steel Cord, A Division of Michelin North America, Inc.
Address:	1010 West Weir Road
City:	Scottsburg, IN 47170
Authorized individual:	Gustavo Diaz
Phone #:	812-752-5909
Registration #:	143-21617-00008

I hereby certify that **American Steel Cord, A Division of Michelin North America, Inc.** is still in operation and is in compliance with the requirements of Registration **143-21617-00008**

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	American Steel Cord, A Division of Michelin North America, Inc.
Source Location:	1010 West Weir Road, Scottsburg, Indiana 47170
County:	Scott
SIC Code:	3471 and 3315
Registration No.:	143-21617-00008
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed an application from American Steel Cord, a steel wire drawing plant, requesting to update the permitted and un-permitted emission units.

The source was originally constructed and permitted in 1990 under a registration no. 3760-0008. This review serves as the re-registration for this source consisting of the addition of previously un-permitted units and the updates in capacities and emissions of the existing permitted emission units.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) natural gas fired steam boilers, identified as B01 and B02, each installed in 1990 with a maximum heat input rate of 2.93 million (MM) British thermal units (Btu) per hour, and each exhausting through stacks B01 and B02.
- (b) Two (2) natural gas fired steam boilers, identified as B03 and B04, each installed in 1990 with a maximum heat input rate of 1.255 million (MM) British thermal units (Btu) per hour, and each exhausting through stacks B03 and B04.
- (c) Six (6) natural gas fired unit heaters located at RT department, identified as GUH 1-6, and each with a maximum heat input rate of 0.2 MMBtu per hour.
- (d) Five (5) natural gas fired unit heaters located at RO Department, identified as GUH 7-11, and each with a maximum heat input rate of 0.165 MMBtu per hour.
- (e) One (1) natural gas fired unit heater located at small mechanical room, identified as GUH 12, and with a maximum heat input rate of 0.05 MMBtu per hour.
- (f) Four (4) natural gas fired unit heaters used for plating line tanks, identified as GUH 13-16, and each with a maximum heat input rate of 0.130 MMBtu per hour.
- (g) Two (2) natural gas fired unit heaters located at RO department, identified as GUH 17 and 18, and each with a maximum heat input rate of 0.165 MMBtu per hour.
- (h) Six (6) natural gas fired unit heaters located at RC department, identified as GUH 19-24, and each with a maximum heat input rate of 0.3 MMBtu per hour.

- (i) Two (2) natural gas fired unit heaters located at wet lube room, identified as GUH 25 and 26, and each with a maximum heat input rate of 0.1 MMBtu per hour.
- (j) One (1) natural gas fired unit heater located at main mechanical room, identified as GUH 29, with a maximum heat input rate of 0.130 MMBtu per hour.
- (k) Six (6) natural gas fired unit heaters located at RD department, identified as GUH 30-35, each with a maximum heat input rate of 0.4 MMBtu per hour.
- (l) Two (2) natural gas fired unit heaters located at shipping department, identified as GUH 36 and 37, each with a maximum heat input rate of 0.2 and 0.1 MMBtu per hour, respectively.
- (m) Two (2) natural gas fired unit heaters, identified as GUH 38 and 39, each with a maximum heat input rate of 0.1 and 0.2 MMBtu per hour, respectively.
- (n) Eight (8) natural gas fired roof top units, identified as RTU 1-8, each with a maximum heat input rate of 0.12, 0.16, 0.16, 0.12, 0.16, 0.16, 0.079, and 0.16 MMBtu per hour, respectively.
- (o) Seven (7) natural gas fired make up air units, identified as MAU 1-7, each with a maximum heat input rate of 1.10 MMBtu per hour.
- (p) One (1) hydrochloric acid (HCl) pickling line consisting of two (2) HCl baths, with combined maximum capacity of 5,454.49 pounds per hour, identified as EU 1 and 2, equipped with a packed tower for control, and exhausting through one (1) stack identified as CE 01.
- (q) One (1) natural gas fired oven for the pickling and zinc-phosphate line, identified as DF-1, with a maximum heat input rate of 0.80 MMBtu per hour.
- (r) One (1) zinc-phosphate bath part of the HCl pickling line, identified as EU 3; four (4) sulfuric acid baths, identified as EU12 – 14, and equipped with packed tower brassing scrubber for control; four (4) Copper plating baths, identified as EU 20 – 23; four (4) zinc plating baths, identified as EU 24 – 27; and four (4) sodium hydroxide bath, identified as EU 16 – EU19.
- (s) Eight (8) dry draw lines, identified as EU 4 – 11, with combined processing capacity of 2.73 tons of wire per hour.
- (t) Two (2) natural gas fired plating lines, identified as PF-1 and PF-2, each with a maximum heat input rate of 2.56 MMBtu per hour.
- (u) Eighty (80) wet drawing machines, identified as EU 30 – 109.
- (v) Two (2) natural gas fired pressurized fluidized beds, identified as FBP-1 an FBP-2, each with a maximum heat input rating of 2.78 MMBtu per hour, and equipped with an inertial separator for control.
- (w) Two (2) natural gas fired diffusion fluidized beds, identified as FBD-1 an FBD-2, each with a maximum heat input rating of 2.78 MMBtu per hour, and equipped with an inertial separator for control.
- (x) Three (3) storage tanks identified as EU 111, 112 and 113 (storing new hydrochloric acid, spent hydrochloric acid, and zinc-phosphate solution, respectively), each with maximum storage capacity of 6,000 gallons.

- (y) Two (2) storage tanks identified as EU 114 and 124 (storing sodium hydroxide), each with a maximum storage capacity of 5,640 and 1,450 gallons, respectively.
- (z) Two (2) storage tanks identified as EU 115 and 116 (storing sulfuric acid), each with a maximum storage capacity of 4,885 and 1,000 gallons, respectively.
- (aa) Three (3) storage tanks identified as EU 118, 119 and 126 (storing Copper), each with a maximum storage capacity of 3,700, 1,050, and 1,000 gallons, respectively.
- (bb) Two (2) storage tanks identified as EU120 and 121 (storing Zinc), each with a maximum storage capacity of 725 and 1,500 gallons, respectively.
- (cc) Two (2) storage tanks identified as EU 122 and EU 126 (storing spent acid and copper, respectively), with a maximum storage capacity of 4,500 and 1,000 gallons, respectively.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

- (dd) Two (2) phosphoric acid baths, identified as EU28 and 29.
- (ee) Two (2) storage tanks identified as EU 123 and 125 (storing spent acid and spent sodium hydroxide, respectively), each with a maximum storage capacity of 6,000 and 7,000 gallons, respectively.
- (ff) Two (2) natural gas fired roof top units, identified as RTU 9 and 10, each with a maximum heat input rate of 0.825 and 0.25 MMBtu per hour, respectively.
- (gg) One (1) scrap metal torching operation identified as EU 110, with a maximum process weight rate of 0.35 tons per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Registration No. 3760-00008, issued on June 19, 1990.
- (b) Administrative Amendment No. 143-8987-00008, issued on December 19, 1997.
- (c) Administrative Amendment No. 143-9378-00008, issued on January 29, 1998.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the operation 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 29, 2005, with additional information received on August 11, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 8).

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, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	17.89
PM-10	18.97
SO ₂	0.11
VOC	1.04
CO	15.95
NO _x	18.99

HAPs	Potential to Emit (tons/yr)
HCl	1.66
Hexane	0.341
Others	0.02
Total	2.18

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of criteria pollutants is less than 25 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-6.1.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM10 is greater than levels listed in 326 IAC 2-1.1-3(d)(1), therefore the source is subject to the provisions of 326 IAC 2-5.5.1. A registration will be issued.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

County Attainment Status

The source is located in Scott County.

Pollutant	Status
PM-10	Attainment
PM-2.5	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 emissions and NOx are considered when evaluating the rule applicability relating to ozone. Scott County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Scott County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Scott 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. See the State Rule Applicability for the source section.
- (f) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 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 and Emission Offset applicability.

Source Status

Existing Source (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	17.89
PM-10	18.97
SO ₂	0.11
VOC	1.04
CO	15.95
NO _x	18.99
Single HAP	0.42
Combination HAPs	0.94

- (a) This existing source is not a major stationary source because no attainment regulated 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.
- (b) These emissions were based on the information provided in the source permit applications (see Appendix A for emission calculations).

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

The total emissions indicated in this Registration R-035-18040-00008, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) are not included in the permit for the four (4) boilers, identified as B01, B02, B03, and B04, with a maximum heat input capacity of 2.93, 2.93, 1.255, and 1.255 MMBtu per hour, respectively, because each boiler's capacity is less than the rule applicability threshold of 10 MMBtu per hour.
- (b) The four (4) boilers, identified as B01, B02, B03, and B04, with a maximum heat input capacity of 2.93, 2.93, 1.255, and 1.255 MMBtu per hour, respectively, are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The four (4) boilers are part of the affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7575, because they have a rated capacity of less than or equal to 10 million British thermal units per hour heat input. However, pursuant to 40 CFR 63.7506(c), there are no applicable requirements from 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart A for the small gaseous fuel subcategory.
- (c) The requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR Parts 60.110, 110a 115a or 110b 117b, as Subparts K, Ka, and Kb, respectively) are not included in the permit for any of the storage tanks at this source because the tanks do not store a petroleum liquid as defined in the rule and the storage capacity of each tank is below the minimum applicable threshold for the three rules (i.e., 40 cubic meters (10,568 gallons)).
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants, Subpart CCC, 40 CFR 63 are not included in the permit for this steel pickling facility because the source is not a major source of HAP. The potential of emit of any combination of HAPs and any single HAP is less than 25 and 10 tons per year, respectively.

State Rule Applicability – Entire Source

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

This source is not subject to this rule because potential uncontrolled emissions of all criteria pollutants are less than 250 tons per year. This source is also not one of the 28 listed source categories. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because the source has PTE of any HAP less than 10 tons per year and PTE of any combination of HAPs less than 25 tons per year. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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 – Individual Facilities

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

None of the emission units at the source has potential VOC emissions equal to or greater than twenty five (25) tons per year, therefore the requirements of 326 IAC 8-1-6 do not apply.

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

- (a) The allowable particulate emission rate from the dry draw lines (EU 4 through EU 11) shall not exceed 8.035 pounds per hour when operating at a process weight rate of 2.73 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

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

$$E = 4.10 (2.73)^{0.67} = 8.035 \text{ lb PM/hr}$$

The eight (8) dry lines will comply with the emission limit of 8.035 lb/hr since the uncontrolled PM emissions from this unit are 2.70 lb/hr.

- (b) The allowable particulate emission rate from the scrap metal torching (EU 110) shall not exceed 2.03 pounds per hour when operating at a process weight rate of 0.35 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

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

$$E = 4.10 (0.35)^{0.67} = 2.03 \text{ lb PM/hr}$$

The scrap metal torching (EU 110) will comply with the emission limit of 8.035 lb/hr since the uncontrolled PM emissions from this unit are 2.70 lb/hr.

- (c) Four (4) plating line fluidized beds, identified as FBP-1, FBP-2, FBD-1, and FBD-2, are exempt from the requirements of 326 IAC 6-3-2, because the combined potential particulate emissions from these units is less than 0.551 pounds per hour.

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

The four (4) natural gas fired boilers rated 2.93, 2.93, 1.255, and 1.255 MMBtu/hr, installed in 1990, identified as B01, B02, B03, and B04, respectively, are subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

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

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. operation capacity rating = 8.37 MMBtu/hr

$$Pt = 1.09/8.37^{0.26} = 0.627 \text{ lbs PM/MMBtu}$$

compliance calculation:

Potential PM emissions for the four (4) boilers = 1.9 lb PM/MMCF * (1/1000) (MMCF/MMBtu) = 0.0019 lbs PM/MMBtu

Potential PM emissions for the four (4) boilers (0.0019 lbs PM/MMBtu) is less than allowable 0.627 lbs PM/MMBtu, therefore the boiler will comply with the requirements of 326 IAC 6-2-4.

Conclusion

The operation of this steel wire drawing plant shall be subject to the conditions of the Registration No. 143-21617-00008.

Appendix A: Emission Calculations

Company Name: American Steel Cord, A Division of Michelin North America, Inc.
Address City IN Zip: 1010 West Weir Road, Scottsburg, Indiana 47170
Permit No.: 143-21617-00008
Reviewer: Adeel Yousuf / EVP
Date: August 11, 2005

Uncontrolled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Pickling	Scrap Metal Torching	Natural Gas Combustion	Tank	Plating	Dry Draw Lines	TOTAL
	Process Bath Emissions	EU-110		HCl Storage	Fluidized Beds		
PM	0.00	4.38	0.36	0.00	1.30	11.85	17.89
PM10	0.00	4.38	1.44	0.00	1.30	11.85	18.97
SO2	0.00	0.00	0.11	0.00	0.00	0.00	0.11
NOx	0.00	0.00	18.99	0.00	0.00	0.00	18.99
VOC	0.00	0.00	1.04	0.00	0.00	0.00	1.04
CO	0.00	0.00	15.95	0.00	0.00	0.00	15.95
total HAPs	1.66	0.00	0.36	0.16	0.00	0.00	2.18
worst case single HAP	1.66 (HCl)	0.00	0.341 (Hexane)	0.16 (HCl)	0.00	0.00	1.82 (HCl)
Total emissions based on rated capacity at 8,760 hours/year.							
Controlled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Pickling	Scrap Metal Torching	Natural Gas Combustion	Tank	Plating	Dry Draw Lines	TOTAL
	Process Bath Emissions	EU-110		HCl Storage	Fluidized Beds		
PM	0.00	4.38	0.36	0.00	1.30	11.85	17.89
PM10	0.00	4.38	1.44	0.00	1.30	11.85	18.97
SO2	0.00	0.00	0.11	0.00	0.00	0.00	0.11
NOx	0.00	0.00	18.99	0.00	0.00	0.00	18.99
VOC	0.00	0.00	1.04	0.00	0.00	0.00	1.04
CO	0.00	0.00	15.95	0.00	0.00	0.00	15.95
total HAPs	0.42	0.00	0.36	0.16	0.00	0.00	0.94
worst case single HAP	0.42 (HCl)	0.00	0.341 (Hexane)	0.16 (HCl)	0.00	0.00	1.82 (HCl)
Total emissions based on rated capacity at 8,760 hours/year, after control.							

**Appendix A: Emissions Calculations
Process Emissions**

Company Name: American Steel Cord, A Division of Michelin North America, Inc.
Address City IN Zip: 1010 West Weir Road, Scottsburg, Indiana 47170
Permit No.: 143-21617-00008
Reviewer: Adeel Yousuf / EVP
Date: August 11, 2005

PROCESS BATH EMISSIONS

HYDROCHLORIC ACID - EMISSION UNITS 1 AND 2

MAX CAPACITY =	1	COIL/HR	(PROCESS TIME PER SPEC)
CORD PROCESSED =	45386847.04	LBS/YR	2004
HOURS OPERATED =	8321	HRS	
MAX PROCESS RATE =	5,454.49	LBS/HR	
POTENTIAL PRODUCTION =	47,781,370.04	LBS/YR	

POTENTIAL TO EMIT

* HCL EMISSIONS (LB/HR) =	0.38	FOR 2 BATHS	
HOURS OF OPERATIONS =	8760	PTE	
POTENTIAL EMISSIONS (LBS/YEAR) =	3,328.80	1.66	TONS/YR
SCRUBBER REMOVAL =	75%		
CONTROLLED EMISSIONS (LBS/YEAR) =	832.20	0.42	TONS/YR
EMISSIONS PER BATH (LBS/YR)=	416.10	0.208	TONS/YR
HCL TO WW (LBS) =	2,496.60		

ACTUAL 2004 EMISSIONS

HCL EMISSIONS (LB/HR) =	0.38	FOR 2 BATHS	
HOURS OF OPERATIONS =	8321	ACTUAL	
POTENTIAL EMISSIONS (LBS/YEAR) =	3,161.98	1.58	TONS/YR
SCRUBBER REMOVAL =	75%		
EMISSIONS (LBS/YEAR) =	790.50	0.40	TONS/YR
EMISSIONS PER BATH (LBS/YR)=	395.25	0.198	TONS/YR
HCL TO WW (LBS) =	2,371.49		

* HCL EMISSIONS ARE PROVIDED BY THE SOURCE BASED ON ENGINEERING CALCULATIONS BY ESCO ENGINEERING.

**Appendix A: Emissions Calculations
Metal Torching**

Company Name: American Steel Cord, A Division of Michelin North America, Inc.
Address City IN Zip: 1010 West Weir Road, Scottsburg, Indiana 47170
Permit No.: 143-21617-00008
Reviewer: Adeel Yousuf / EVP
Date: August 11, 2005

SCRAP METAL TORCHING - EMISSION UNIT 110

INSIGNIFICANT ACTIVITY

MAX. WIRE SCRAP TO TORCHING =	5833536.96 LBS/YR (PLATED WIRE ONLY)
* PM EMISSION FACTOR =	0.0015 LBS PM/LBS METAL REMOVED
PM EMISSIONS FOR TORCHING =	8750.31 LBS PM/YR
	4.38 TONS/YR PM and PM-10
	0.999 LBS/HR PM and PM-10

* EMISSION FACTOR FOR PM IS FROM AIR POLLUTION ENGINEERING MANUAL SECOND EDITION, AIR & WASTE MANAGEMENT ASSOCIATION

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: American Steel Cord, A Division of Michelin North America, Inc.
Address City IN Zip: 1010 West Weir Road, Scottsburg, Indiana 47170
Permit No.: 143-21617-00008
Reviewer: Adeel Yousuf / EVP
Date: August 11, 2005

Heat Input Capacity
MMBtu/hr
43.3

Potential Throughput
MMCF/yr
379.7

Facilities	MMBtu/hr
Thirty seven (37) natural gas unit heaters with combined heat input rating of	8.055
Ten (10) natural gas fired roof top units with combined heat input rating of	2.194
Four (4) natural gas fired steam boilers with combined heat input rating of	8.370
Seven (7) natural gas fired make up air unit with combined heat input rating of	7.700
One (1) natural gas fired pickling line drying oven with heat input rating of	0.800
Two (2) natural gas fired plating line process heaters with combined heat input rating of	5.119
Two (2) fluidized bed pressurized units with combined heat input rating of	5.556
Two (2) fluidized bed Diffusion units with combined heat input rating of	5.556
Total	43.349

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.36	1.44	0.11	18.99	1.04	15.95

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 100

HAPs Emissions

Company Name: American Steel Cord, A Division of Michelin North America, Inc.
Address City IN Zip: 1010 West Weir Road, Scottsburg, Indiana 47170
Permit No.: 143-21617-00008
Reviewer: Adeel Yousuf / EVP
Date: August 11, 2005

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.987E-04	2.278E-04	1.424E-02	3.418E-01	6.456E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	9.494E-05	2.089E-04	2.658E-04	7.215E-05	3.987E-04

Methodology is the same as page 4.

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

**Appendix A: Emission Calculations
Tank Emissions - Maximum PTE**

Company Name: American Steel Cord, A Division of Michelin North America, Inc.
Address City IN Zip: 1010 West Weir Road, Scottsburg, Indiana 47170
Permit No.: 143-21617-00008
Reviewer: Adeel Yousuf / EVP
Date: August 11, 2005

Tank ID	Product Stored	Losses (Tons per Year)				Total HCl Tons/yr
		Breathing	Working	Standing	Withdrawal	
Vertical Fixed Roof Tanks:						
111	HCl	0.01	0.07	0.00	0.00	0.08
112	HCl	0.01	0.07	0.00	0.00	0.08
Total HAP:						0.16

Note: Storage tank emission are provided by the source and estimated using USEPA's Tanks 4.09 software program and are based on the estimated maximum annual throughput.

**Appendix A: Emissions Calculations
Plating Lines**

Page 7 of 8 TSD App A

Company Name: American Steel Cord, A Division of Michelin North America, Inc.
Address City IN Zip: 1010 West Weir Road, Scottsburg, Indiana 47170
Permit No.: 143-21617-00008
Reviewer: Adeel Yousuf / EVP
Date: August 11, 2005

PLATING LINE FLUIDIZED BEDS - PARTICULATE MATTER

FBP-1 = LINE 1-1 FLUIDIZED BED
FBP-2 = LINE 2-1 FLUIDIZED BED
FBD-1 = LINE 1-2 FLUIDIZED BED
FBD-2 = LINE 2-2 FLUIDIZED BED

RATES FOR FOUR (4) BEDS:

USAGE RATE =	60 BAGS/MONTH	WASTE RATE =	260 GAL/YR
	50 LBS/BAG		9980.62 LBS/YR
TOTAL USED =	36000 LBS/YEAR		
	4.33 LBS/HR		

USED - WASTE =	26019.38 LBS
SEPARATOR EFFICIENCY =	90% (ASSUMPTION)
AMOUNT SEPARATED =	23417.44 LBS IN CONE TO WASTE
AMOUNT PM EMITTED =	2601.94 LBS
	1.301 TONS/YR PM and PM-10
	0.33 TONS/YR PER BED PM and PM-10

**Appendix A: Emissions Calculations
Drawing Lines**

Company Name: American Steel Cord, A Division of Michelin North America, Inc.
Address City IN Zip: 1010 West Weir Road, Scottsburg, Indiana 47170
Permit No.: 143-21617-00008
Reviewer: Adeel Yousuf / EVP
Date: August 11, 2005

DRY DRAW - PARTICULATE EMISSIONS

TAKEN FROM SIMILAR PROCESS:

Particulate Emissions (1990 stack testing) =	0.546 lbs/hr
Steel Production (1990):	0.55 tons/hr
Emission Factor =	0.993 lbs PM/tons of steel produced

ACTUAL 2004 PRODUCTION:

45,386,847.04 LBS WIRE PRODUCED FOR DRY DRAW IN 2004
 22,693.42 TONS/YR
 2.73 TONS WIRE/HR

RATIO OF SIMILAR PROCESS VS. ASC ACTUAL PROCESS:

SIMILAR PROCESS		ASC	
WIRE PROCESSED =	0.55 TONS/HR	WIRE PROCESSED =	2.73 TONS/HR
PM STACK TEST =	0.546 LBS PM/HR	EST. PM RATE =	2.707 LBS PM/HR

CALCULATE ACTUAL EMISSIONS:

ACTUAL EMISSIONS:
 ACTUAL PROCESS RATE = 2.73 TONS WIRE/HR
 OPERATION HOURS = 8321 HRS/YR
 POTENTIAL WIRE PRODUCED = 22,693.42 TONS/YR
 EST. PTE PM RATIO = 2.707 LBS PM/HR
 PTE PARTICULATE MATTER = 22,528.38 LBS PM/YR
11.26 TONS/YR PM and PM-10 *

*assume that PM is equal to PM-10

CALCULATE POTENTIAL TO EMIT FROM HOURLY RATIO

HOURLY RATIO BETWEEN 8321:8760

ACTUAL	POTENTIAL	
$\frac{11.26}{8321}$	$\frac{X}{8760}$	$= \frac{\text{TONS PM/YR}}{\text{OP HRS/YR}}$
X =		11.85 TONS/YR PM and PM-10 FOR 8 MACHINES

ASSUME PTE IS EQUALLY DISTRIBUTED ACROSS THE 8 MACHINES:

PTE PM FOR EACH MACHINE = **1.48 TONS/YR PM and PM-10**

WET DRAW - PARTICULATE EMISSION CALCULATIONS

WET DRAW USES 79 MACHINES TO PRODUCE 4 SPECIFICATIONS OF WIRE. MAX. PROCESS WEIGHT RATE IS 5,000 LB WIRE/HR. SINCE WET LUBE IS CONTINUOUSLY FLOWED OVER THE WIRE AS IT IS BEING DRAWN, THE PARTICULATE MATTER WOULD BE COLLECTED IN THE WET LUBE, THUS NO PM AIR EMISSIONS FOR THE WET LUBE