



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: July 19, 2006  
RE: Voss Clark dba PGP Corporation / 019-21953-00054  
FROM: Nisha Sizemore  
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 according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **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  
FNPER.dot 03/23/06



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**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
RENEWAL AND NEW SOURCE REVIEW  
OFFICE OF AIR QUALITY**

**Voss Clark dba PGP Corporation  
701 Loop Road, Clark Maritime Centre  
Jeffersonville, Indiana 47130**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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.**

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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 addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F019-21953-00054	
Issued by: Origin signed by  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 19, 2006  Expiration Date: July 19, 2011

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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 2-8-3(b)]

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The Permittee owns and operates a stationary steel pickling and coil coating processing plant.

Authorized individual:	President
Source Address:	701 Loop Road, Clark Maritime Centre, Jeffersonville, Indiana 47130
Mailing Address:	701 Loop Road, Clark Maritime Centre, Jeffersonville, Indiana 47130
General Phone	812-285-7700
SIC Code:	3399
Source Location Status:	Clark
County Status:	Nonattainment for Ozone under the 8-Hour standard and PM2.5 Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD, Emission Offset and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) hydrochloric acid steel pickling line (identified as unit 1) processing 102 tons per hour of steel coil, and controlled by (2) packed bed scrubbers connected in series. This unit was constructed in 1992.
- (b) One (1) coil coating line (identified as unit 2) using roll coater, with a maximum processing capacity of 13.7 tons per hour of steel coil. This unit was constructed in 1994.
- (c) One (1) natural gas-fired boiler (identified as unit 3) with a maximum heat input capacity of 16.75 MMBtu per hour. This unit was constructed in 1992.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9-1]
- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Packing lubricants or greases.
- (d) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings/lubricants.
- (e) Cleaners and solvents characterized as follows:

- (1) Having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 degrees F); or
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
  - (g) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
  - (h) Any operations using aqueous solutions containing less than one percent (1%) by weight VOCs, excluding HAPs.
  - (i) Paved and unpaved roads and parking lots with public access.
  - (j) Diesel generators not exceeding 1600 horsepower.
  - (k) A laboratory as defined in 326 IAC 2-7-1(21)(D).

A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

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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 2-8-4(2)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]**

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- (a) This permit, 019-21953-00054, 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 until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 Enforceability [326 IAC 2-8-6]**

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

### **B.5 Severability [326 IAC 2-8-4(4)]**

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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 2-8-4(5)(D)]**

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

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

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- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.9 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 an authorized individual 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) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

- (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 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-0178 (ask for Compliance Section)  
Facsimile No.: 317-233-6865

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- (h) Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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- (a) All terms and conditions of permits established prior to 019-21953-00054 and issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,

- (2) revised
- (3) deleted

(b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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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 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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  
Indianapolis, Indiana 46204-2251

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-8(a)]

(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 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (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 2-8-3. 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (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 until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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 2-8 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 needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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  
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(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.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis which document all such changes and emissions trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

- (d) 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.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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 FESOP 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, at reasonable times, 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 at reasonable times, 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, at reasonable times, 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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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  
Indianapolis, Indiana 46204-2251
- The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 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.

#### C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.3 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 thirty percent (30%) 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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

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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).

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-4(3)]

#### C.8 Performance Testing [326 IAC 3-6]

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

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  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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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 2-8-4] [326 IAC 2-8-5(a)(1)]

#### C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

---

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. 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 emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

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

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

**C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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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.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.

- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.17 General Reporting Requirements [326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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  
Indianapolis, Indiana 46204-2251

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) hydrochloric acid steel pickling line (identified as unit 1) processing 102 tons per hour of steel coil, and controlled by (2) packed bed scrubbers connected in series. This unit was constructed in 1992.

(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 2-8-4(1)]

#### D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

- (a) Pursuant to FESOP No.: 019-14009-00054 issued August 8, 2001 and 326 IAC 2-8 and revised by this permit:

The input of steel to the hydrochloric acid steel pickling line shall be limited to 900,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month and HCl emissions shall not exceed 0.021 pounds per ton of steel processed. These limits are required to limit the potential to emit of a single HAP (HCl) to less than ten (10) tons per twelve (12) consecutive month period.

Compliance with the above limit ensures that the total HAP emissions from the entire source (including activities listed in Sections D.2 through D.4) are less than 25 tons per year and renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

- (b) Pursuant to 326 IAC 2-8, the PM10 emissions shall not exceed 0.2 pounds per ton of steel processed. This limit combined with the steel throughput limit in paragraph (a) of this condition limits the potential to emit PM10 from the entire source to less than 90.5 tons per twelve (12) consecutive month period and renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.1.3 HCL and Particulate Control

In order to comply with condition D.1.1, the packed bed scrubbers for HCl and particulate control shall be in operation and control emissions from the steel pickling line at all times that the pickling line is in operation.

#### D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform HCl and PM10 testing for the steel pickling line within 60 days after achieving maximum production rate, but no later than 180 days after issuance of this permit, F019-21953-00054, utilizing methods as approved by the Commissioner. PM10 includes filterable and condensable PM10. 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.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.1.5 Monitoring of Scrubber Operational Parameters

Pursuant to F019-14009-00054, issued August 8, 2001:

- (a) The Permittee shall record the hydrochloric acid (HCl) concentration in the second packed bed scrubber used in conjunction with the steel pickling line at least once per day when the steel pickling line is in operation. The HCl concentration shall be determined by obtaining a sample every day and performing titration. When for any one reading, the HCl concentration in the second packed bed scrubber is above the maximum of 0.1 percent or a maximum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. A HCl concentration that is above the minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall record the fan inlet vacuum pressure of the second packed bed scrubber used in conjunction with the steel pickling line at least once per day when the steel pickling line is in operation. When for any one reading, the fan inlet vacuum pressure of the second packed bed scrubber is below the minimum of 2.0 inches of water or a minimum as established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A fan inlet vacuum pressure that is below the minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (c) The Permittee shall record the flow rate of the first and second packed bed scrubbers used in conjunction with the steel pickling line at least once per day when the steel pickling line is in operation. When for any one reading, the flow rate across the first and second packed bed scrubber is less than a normal minimum of 340 gallons per minute for the first packed bed scrubber and less than a normal minimum of 310 gallons per minute for the second packed bed scrubber, as established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A flow rate that is below the minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (d) The instruments used for determining the pressure reading and flow rate shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.1.6 Failure Detection

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In the event that a packed bed scrubber malfunction 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 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.7 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The input of steel used on a monthly basis.
  - (2) The weight of HAPs emitted for each compliance period in pounds per ton of steel processed.

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of the following operational parameters for the packed bed scrubber once per day:
  - (1) Fan inlet vacuum pressure for the second packed bed scrubber;
  - (2) Flow rate in the first and second packed bed scrubbers; and
  - (3) Titration results used to measure HCl concentration in the second packed bed scrubber.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) natural gas-fired boiler (identified as unit 3) with a maximum heat input capacity of 16.75 MMBtu per hour. This unit was constructed in 1992.

(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 2-8-4(1)]

#### D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the one (1) natural-gas fired boiler (identified as unit 3) shall not exceed 0.52 pounds per million British thermal units (lbs/MMBtu) of heat input, respectively.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where Pt = lbs of PM per MMBtu heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour heat input (16.57 MMBtu/hour)

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-7-15(13)]

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

### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.2.3 Record Keeping Requirements

- (a) Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), the Permittee shall maintain monthly fuel records for the natural gas-fired boiler (identified as unit 3).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9-1]

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

### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.3.1 Volatile Organic Compounds [326 IAC 8-9-6]

Pursuant to 326 IAC 8-9-6 (Volatile Organic Storage Vessels), the stationary vessels with a capacity less than 39,000 gallons are subject to the following provisions:

- (a) Pursuant to 326 IAC 8-9-6(a), the Permittee shall keep all records for the petroleum fuel storage vessel for three (3) years unless specified otherwise.
- (b) Pursuant to 326 IAC 8-9-6(b), the Permittee shall maintain records and submit to IDEM, OAQ a report containing the following information for the petroleum fuel storage vessel:
- (1) The vessel identification number;
  - (2) The vessel dimension; and
  - (3) The vessel capacity.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) coil coating line (identified as unit 2) using roll coater, with a maximum processing capacity of 13.7 tons per hour of steel coil. This unit was constructed in 1994.

(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 2-8-4(1)]

#### D.4.1 Volatile Organic Compounds [326 IAC 8-2-4]

Pursuant to F019-14009-00054 issued August 8, 2001 and 326 IAC 8-2-4(Surface Coating Emission Limitations: Coil Coating Operations), the roll coater shall not allow the discharge into the atmosphere of any volatile organic compounds in excess of 0.31 kilograms per liter of coating (2.6 pounds per gallon) excluding water, delivered to the coating applicator from prime and topcoat or single coat operations.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Voss Clark dba PGP Corporation  
Source Address: 701 Loop Road, Clark Maritime Centre, Jeffersonville, Indiana 47130  
Mailing Address: 701 Loop Road, Clark Maritime Centre, Jeffersonville, Indiana 47130  
FESOP No.: 019-21953-00054

**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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Voss Clark dba PGP Corporation  
Source Address: 701 Loop Road, Clark Maritime Centre, Jeffersonville, Indiana 47130  
Mailing Address: 701 Loop Road, Clark Maritime Centre, Jeffersonville, Indiana 47130  
FESOP No.: 019-21953-00054

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

**Page 2 of 2**

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

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

A certification is not required for this report.

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

### FESOP Quarterly Report

Source Name: Voss Clark dba PGP Corporation  
 Source Address: 701 Loop Road, Clark Maritime Centre, Jeffersonville, Indiana 47130  
 Mailing Address: 701 Loop Road, Clark Maritime Centre, Jeffersonville, Indiana 47130  
 FESOP No.: 019-21953-00054  
 Facility: Steel Pickling Line  
 Parameter: Steel input and HCl emissions  
 Limit: Less than 900,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month and HCl emissions less than 0.022 pounds per ton of steel processed

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

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	Steel Input	HCl	Steel Input	HCl	Steel Input	HCl
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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Voss Clark dba PGP Corporation  
 Source Address: 701 Loop Road, Clark Maritime Centre, Jeffersonville, Indiana 47130  
 Mailing Address: 701 Loop Road, Clark Maritime Centre, Jeffersonville, Indiana 47130  
 FESOP No.: 019-21953-00054

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

Page 1 of 2

<p>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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

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

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

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

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

Attach a signed certification to complete this report.

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

Addendum to the  
Technical Support Document (TSD)  
for New Source Review and  
Federally Enforceable State Operating Permit Renewal

**Source Background and Description**

Source Name:	Voss Clark, Inc.
Source Location:	701 Loop Road, Clark Maritime Centre, Jeffersonville, Indiana 47130
County:	Clark
SIC Code:	3399
Operation Permit No.:	019-21953-00054
Permit Reviewer:	ERG/SD

On May 31, 2006 the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) had a notice published in the Evening News, Jeffersonville, Indiana, stating that Voss Clark, Inc. had applied for a New Source Review and Federally Enforceable State Operating Permit Renewal for a stationary steel pickling and coil coating processing plant. The notice also stated that IDEM, 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 June 27, 2006, The Permittee submitted the following comments on the draft permit as shown below. New language is shown in **bold** and deleted language is shown in ~~strikeout~~. The Table of Contents has been updated as necessary.

**Comment 1:**

The Permittee requested Condition D.1.1 be revised to delete the steel throughput limit because the Permittee would prefer to report HCl emissions rather than be limited to steel throughput. The Permittee requested Condition D.1.1 be revised as follows:

“The HCl emissions shall not exceed 10 tons per twelve (12) month consecutive period, or 0.022 pounds per ton of steel processed.”

**Response to Comment 1:**

The FESOP limit as proposed by the Permittee is not practically enforceable. However, since the Permittee does not wish to retain a steel throughput limit and the maximum throughput for this facility is 102 tons of steel per hour (893,520 tons of steel per year), the limits have been changed to pounds per hour limits based on 8760 hours of operation per year. Recordkeeping and Reporting for the throughput limit have been removed. Conditions D.1.1, D.1.7, and D.1.8 are revised as follows:

D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

- (a) Pursuant to FESOP No.: 019-14009-00054 issued August 8, 2001 and 326 IAC 2-8 and revised by this permit:

~~The input of steel to the hydrochloric acid steel pickling line shall be limited to 900,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month and HCl emissions shall not exceed 0.021 pounds per ton of steel processed. These limits are required to limit the potential to emit of a single HAP (HCl) to less than ten (10) tons per twelve (12) consecutive month period.~~ **The potential to emit of a single HAP (HCl) from the scrubber exhaust system controlling the stationary steel pickling line shall be limited to less than 2.05 pounds per hour. This limit is equivalent to nine (9) ton of a single HAP per twelve (12) consecutive month period, with compliance determined at the end of each month.**

Compliance with the above limit ensures that the total HAP emissions from the entire source (including activities listed in Sections D.2 through D.4) are less than 25 tons per year and renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

- (b) Pursuant to 326 IAC 2-8, ~~the potential to emit of PM10 emissions shall not exceed 0.2 pounds per ton of steel processed. This limit combined with the steel throughput limit in paragraph (a) of this condition~~ **from the scrubber exhaust system controlling the stationary steel pickling lines shall be limited to 20.4 pounds per hour. This limit is equivalent to 89.4 tons per year of PM10 from the steel pickling lines** and limits the potential to emit PM10 from the entire source to less than 90.5 tons per twelve (12) consecutive month period and renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

#### D.1.7 Record Keeping Requirements

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- (a) ~~To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.~~
- (1) ~~The input of steel used on a monthly basis.~~
- (2) ~~The weight of HAPs emitted for each compliance period in pounds per ton of steel processed.~~
- (ba) To document compliance with Condition D.1.6, the Permittee shall maintain records of the following operational parameters for the packed bed scrubber once per day:
- (1) Fan inlet vacuum pressure for the second packed bed scrubber;
- (2) Flow rate in the first and second packed bed scrubbers; and
- (3) Titration results used to measure HCl concentration in the second packed bed scrubber.
- (eb) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.8 Reporting Requirements

---

~~A quarterly summary of the information to document compliance with Condition D.1.1 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

**Comment 2:**

The Permittee requested the PM10 testing as listed in Condition D.1.4 be deleted from the permit because they believe that it is not appropriate to require PM10 testing for this unit, as there are no potential source of PM10 emissions from the process other than acid mist (in the form of HCl). Since testing is already required for HCl, the Permittee does not believe it is necessary to also require PM10 testing, and requested it be removed from the permit.

**Response to Comment 2:**

Tests conducted on the scrubber exhaust by the Permittee on June 12, 2002, demonstrated the presence particulate emissions. IDEM believes it is appropriate to continue to test the scrubber to ensure device degradation, improper operation, or improper maintenance has not caused the emission limit to be violated. Therefore, no changes were made as a result of this comment.

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

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit  
(FESOP) Renewal and New Source Review

**Source Background and Description**

Source Name:	Voss Clark dba PGP Corporation
Source Location:	701 Loop Road Clark Maritime Centre, Jeffersonville, Indiana 47130
County:	Clark
SIC Code:	3399
Operation Permit No.:	019-14009-00054
Operation Permit Issuance Date:	August 8, 2001
Permit Renewal No.:	019-21953-00054
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a FESOP renewal and New Source Review application from Voss Clark dba PGP Corporation relating to the operation of a steel pickling and coil coating processing plant.

**History**

On October 23, 2005, the Permittee submitted an application for a FESOP renewal for an existing steel pickling and coil coating manufacturing plant located at 701 Loop Road, Clark Maritime Centre, Jeffersonville, Indiana. In their application for the renewal of their FESOP, the Permittee requested permission to increase the throughput of the acid steel pickling line, identified as unit 1, from 60,000 tons of coil per month to 75,000 tons of coil per month (equivalent to 900,000 tons of coil per 12 consecutive months). However, the Permittee will continue to limit the potential to emit of single HAP (HCl) to less than 10 tons per year and any combination of HAPs to less than 25 tons per year. This increase in throughput is attributed to improved material handling and operator efficiency. There is no new installation of additional equipment or any construction of new emission units. Furthermore, the Permittee has indicated that the material utilized in the coil coating line contains no volatile organic compounds (VOCs) or hazardous air pollutants (HAPs).

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) hydrochloric acid steel pickling line (identified as unit 1) processing 102 tons per hour of steel coil, and controlled by (2) packed bed scrubbers connected in series. This unit was constructed in 1992.
- (b) One (1) coil coating line (identified as unit 2) using roll coater, with a maximum processing capacity of 13.7 tons per hour of steel coil. This unit was constructed in 1994.
- (c) One (1) natural gas-fired boiler (identified as unit 3) with a maximum heat input capacity of 16.75 MMBtu per hour. This unit was constructed in 1992.

### Unpermitted Emission Units and Pollution Control Equipment

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

### Insignificant Activities

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

- (a) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9-1]
- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Packing lubricants or greases.
- (d) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings/lubricants.
- (e) Cleaners and solvents characterized as follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 degrees F), or
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (g) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (h) Any operations using aqueous solutions containing less than one percent (1%) by weight VOCs, excluding HAPs.
- (i) Paved and unpaved roads and parking lots with public access.
- (j) Diesel generators not exceeding 1600 horsepower.
- (k) A laboratory as defined in 326 IAC 2-7-1(21)(D).

### Existing Approvals

The source has been operating under the previous FESOP No. 019-14009-00054 issued August 8, 2001, with an expiration date of August 8, 2006, and the following amendments and revisions:

First Administrative Amendment No. 019-18774-00054, issued on April 27, 2004.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) F019-14009-00054 issued on August 8, 2001:

**Condition D.2.2:** The amount of VOCs delivered to the roll coater plus the amount of VOCs used for solvent cleanup shall not exceed 98 tons per twelve (12) month consecutive period. This limit will render the requirements of 326 IAC 2-7 not applicable.

**Reason not incorporated:** The Permittee has indicated and IDEM, OAQ has confirmed that the material utilized in the coil coating line contains no volatile organic compounds (VOCs) or hazardous air pollutants (HAPs). Therefore, there are no potential emissions of VOCs or HAPs. However, any change or modification that would increase the potential emissions of VOC equal to or greater than 100 tons per year shall obtain prior approval from IDEM, OAQ.

**Condition D.1.1:** The HCL emissions shall not exceed 10 tons per twelve (12) consecutive month period or 1.19 pounds per ton of steel. This limit will render the requirements of 326 IAC 2-7 not applicable.

**Reason not incorporated:** This FESOP limit has been revised based on the Permittee's request to increase the maximum throughput of the steel pickling line from 60,000 tons of coil per month to 75,000 tons of coil per month (900,000 tons per twelve (12) consecutive month period). The HCL emission limit has been revised from 1.19 pounds per ton of steel to 0.021 pounds per ton of steel processed. This new limit is based on the results from stack testing conducted on June 12, 2002.

#### Enforcement Issue

There are no enforcement actions pending.

#### Recommendation

The staff recommends to the Commissioner that the FESOP Renewal and New Source Review be approved. This recommendation is based on the facts and conditions outlined in this document.

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

An administratively complete FESOP renewal application for the purposes of this review was received on October 25, 2005. Additional information was received on November 30, 2005.

#### Emission Calculations

See Appendix A of this document for detailed emission calculations in Appendix A (pages 1 through 6).

#### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	153
PM10	153
SO <sub>2</sub>	0.55
VOC	1.04
CO	7.72
NO <sub>x</sub>	15.0

HAPs	Unrestricted Potential Emissions (tons/year)
HCl	<10
Benzene	1.51E-04
Dichlorobenzene	8.63E-05
Formaldehyde	539E-03
Hexane	1.29E-01
Toluene	2.45E-04

**Potential to Emit After Issuance**

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Emission Units	Potential To Emit (tons/year)						
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs*
Natural Gas Fired Boiler	0.14	0.55	0.04	0.40	6.04	7.19	1.35E-01
Steel Pickling Line	152	89.4	0.0	0.0	0.0	0.0	Less than or equal to 9.45 tons per year of HCL and 9.45 for the combination of all HAP.
Coil Coating Line	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Diesel Generator	0.55	0.55	0.51	0.64	1.68	7.80	3.32E-02
Total PTE After Issuance	153	90.5	0.55	1.04	7.72	15.0	Less than 10 and 25 for single and combination of HAPs, respectively

\*Potential to emit of HAPs is limited pursuant to 326 IAC 2-8 (FESOP) to less than major source threshold levels in tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

**County Attainment Status**

The source is located in Clark County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Maintenance
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Clark County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) 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. Clark County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (c) Clark 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 – Entire Source section.
- (d) 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 there are no New Source Performance Standards applicable to this source category 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 PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	90.1
PM10	90.5
SO <sub>2</sub>	0.55
VOC	1.04
CO	7.72
NO <sub>x</sub>	15.0
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is not a major stationary source under PSD 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) This existing source is not a major stationary source under Emission Offset and Nonattainment New Source Review because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater.

<b>Federal Rule Applicability</b>
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- (a) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Da - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in this permit for the one (1) natural gas-fired boiler (identified as unit 3) because it has a heat input capacity less than 250 MMBtu per hour.
- (b) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Db – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in this permit for the one (1) natural gas fired boiler (identified as unit 3) because although constructed after June 19, 1984, it has a heat input capacity less than 100 MMBtu per hour.
- (c) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are included in this permit for the one (1) natural gas fired boiler (identified as unit 3) because it was constructed after June 9, 1989 and has a heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour. However, the boiler (identified as unit 3) is subject to only the reporting requirements in 40 CFR 60.48c, because it is a natural gas-fired boiler. As per the reporting requirements given in 40 CFR 60.24(f)(3), the Permittee is required to maintain monthly records of the amount of natural gas combusted.
- (d) The requirements of New Source Performance Standard, 40 CFR Part 60, Subpart TT – Standards of Performance for Metal Coil Surface Coating are not included in this permit for the coil coating operations using roll coaters because according to 40 CFR 60.460(a), this rule is applicable to a source that performs prime coat and finish coat operations. The source uses roll coaters to apply protective coatings to prevent rusting during the shipping process.
- (e) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for the source.
- (f) The requirements of 40 CFR Part 63, Subpart CCC, National Emission Standards for Hazardous Air Pollutants for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants are not included in this permit for this source because the Permittee will continue to operate the plant under the provisions of 326 IAC 2-8 (FESOP), which limits HAP emissions to below major source threshold levels. The source's current permit limits the HAPs emissions to less than major source levels and was issued August 8, 2001, which is prior to the compliance date of June 22, 2002 for 40 CFR 63, Subpart CCC.
- (g) The requirements of 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines are included in this permit for this source because the Permittee will continue to operate the plant under the provisions of 326 IAC 2-8 (FESOP), which limits HAP emission to below major source threshold levels.

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

<b>State Rule Applicability – Entire Source</b>
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**326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

Voss Clark dba PGP Corporation was constructed in 1992 and is not in 1 of the 28 source categories. The Permittee was issued a FESOP No. 019-5472-00054 on December 10, 1996 which limited the potential to emit of each regulated pollutant to less than one hundred (100) tons per year. The FESOP was renewed on August 8, 2001 (No. 019-14009-00054). This source is minor under PSD (including the increase in coil throughput from 60,000 to 75,000 tons per month) because the source will continue to comply with the provisions of 326 IAC 2-8 (FESOP). Therefore, the provisions of 326 IAC 2-2 (PSD) do not apply.

**326 IAC 2-3 Emission Offset**

- (a) Clark County has been designated as nonattainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit 100 tpy of any regulated pollutant. Voss Clark dba PGP Corporation has a potential to emit of PM10 equal to 2.12 tons per year. Therefore, assuming that PM10 emissions represent PM2.5 emissions, the provisions of 326 IAC 2-3 (Emission Offset) do not apply.
- (b) Clark County has been designated as nonattainment for the 8-hour ozone standard. The source has a potential to emit of VOC and NOx equal to 0.40 and 7.44 tons per year. Therefore, the provisions of 326 IAC 2-3 (Emission Offset) do not apply.

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

The potential to emit of HAPs from the operation of steel pickling and coil coating processing plant shall continue to be limited to less than major source threshold levels pursuant to 326 IAC 2-8 (FESOP).

If the potential to emit of HAPs exceeds the major source threshold levels, this source would be subject to the provisions of 40 CFR 63, Subpart CCC for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants because the source pickles carbon steel using a HCl solution that contains six percent (6%) or more by weight and is at a temperature of 100 degrees Fahrenheit or higher.

**326 IAC 2-6 (Emission Reporting)**

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program). The Permittee shall continue to be limited pursuant to the provisions of 326 IAC 2-8 (FESOP). Therefore, the provisions of 326 IAC 2-6 do not apply.

**326 IAC 2-8 (FESOP)**

- (a) Pursuant to FESOP No.: 019-14009-00054 issued August 8, 2001, F019-21953-00054, and 326 IAC 2-8:

The input of steel to the hydrochloric acid steel pickling line shall be limited to 900,000 tons per twelve (12) consecutive month period with compliance determined at the end of

each month and HCl emissions shall not exceed 0.021 pounds per ton of steel processed. These limits are required to limit the potential to emit of a single HAP (HCl) to less than ten (10) tons per twelve (12) consecutive month period.

Compliance with the above limit ensures that the total HAP emissions from the entire source (including activities listed in Sections D.2 through D.4) are less than 25 tons per year and renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

- (b) IDEM, OAQ has included the following emission limitation because the potential to emit PM10 is greater than 100 tons per year.

Pursuant to 326 IAC 2-8, the PM10 emissions shall not exceed 0.2 pounds per ton of steel processed. This limit combined with the steel throughput limit in paragraph (a) of this condition limits the potential to emit PM10 to less than 100 tons per twelve (12) consecutive month period and renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

#### 326 IAC 5-1-2 (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 this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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

#### State Rule Applicability – Steel Pickling Line

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

The steel pickling line is not subject to the provisions of 326 IAC 8-1-6 (New Facilities; General Reduction Requirement) because it does not have potential VOC emissions.

#### State Rule Applicability – Coil Coating Line

##### 326 IAC 8-2-4 (Coil Coating Operations)

Pursuant to F019-14009-00054 issued August 8, 2001 and 326 IAC 8-2-4(Surface Coating Emission Limitations: Coil Coating Operations), the roll coater shall not allow the discharge into the atmosphere of any volatile organic compounds in excess of 0.31 kilograms per liter of coating (2.6 pounds per gallon) excluding water, delivered to the coating applicator from prime and topcoat or single coat operations.

The Permittee has never used or does not intend to use coatings in the coil coating operations that contain VOC. Therefore, the Permittee is in compliance with this rule.

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

The coil coating line is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because pursuant to 326 IAC 6-3-1(b)(6), surface coating processes using roll coating are exempt from the provisions of this rule.

### State Rule Applicability – Natural Gas-Fired Boiler

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

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the one (1) natural-gas fired boiler (identified as unit 3) shall not exceed 0.52 pounds per million British thermal units (lbs/MMBtu) of heat input, respectively.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where Pt = lbs of PM per MMBtu heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour heat input (16.57 MMBtu/hour)

Note: Pursuant to 40 CFR 60.24(f)(3), the Permittee shall comply with the reporting requirements listed under 40 CFR 60.28(c). (See Federal Rule Applicability Section, item (c))

<b>State Rule Applicability – Insignificant Activities</b>
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### Petroleum Fuel Dispensing Facility

#### 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The provisions of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) are not applicable to this source because the tank storage capacity is less than 39,000 gallons.

#### 326 IAC 8-4-6 (Gasoline Dispensing Facilities)

The provisions of 326 IAC 8-4-6 (Gasoline Dispensing Facilities) are not applicable to this source because the source only dispenses petroleum fuel other than gasoline.

#### 326 IAC 8-9-1 (Volatile Organic Storage Vessels)

The provisions of 326 IAC 8-9-1 (Volatile Organic Storage Vessels) are applicable to this source because it is located in Clark County. However, pursuant to 326 IAC 8-9-1(b), stationary vessels with a capacity less than 39,000 gallons are subject to the reporting and recordkeeping provisions of 326 IAC 8-9-6(a) and (b) and exempt from all other provisions of this rule.

- (a) Pursuant to 326 IAC 8-9-6(a), the Permittee shall keep all records for the petroleum fuel storage vessel for three (3) years unless specified otherwise.
- (b) Pursuant to 326 IAC 8-9-6(b), the Permittee shall maintain records and submit to IDEM, OAQ a report containing the following information for the petroleum fuel storage vessel:
  - (1) The vessel identification number;
  - (2) The vessel dimension; and
  - (3) The vessel capacity.

### Diesel Generator

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

The diesel no. 2 fuel oil-fired generator is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because the particulate emissions

from this unit are less than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pounds per hour are exempt from the 326 IAC 6-3-2 limitations.

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

The diesel no. 2 fuel oil fired generator is not subject to the provisions of 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating) because this unit is not an indirect heating unit.

**Brazing Equipment, Cutting Torches, Soldering and Welding Equipment**

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

- (a) The welding equipment is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because less than 625 pounds of rod or wire is consumed per day. [326 IAC 6-3-1(b)(9)]
- (b) The cutting torches are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because less than 3,400 inches per hour of stock one (1) inch thickness or less is cut. [326 IAC 6-3-1(b)(10)]
- (c) The brazing and soldering equipment are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because the particulate emissions from these units are less than 0.551 pounds per hour each. [326 IAC 6-3-1(b)(14)]

**Testing Requirements**

Pursuant to F019-14009-00054, issued August 8, 2001, the Permittee performed a stack test for HCl emissions from the steel pickling line (identified as unit 1) in June 2002. According to the stack test results, the HCl emissions were estimated to be equal to 0.0206 pounds per ton of steel processed.

The Permittee shall perform HCl and PM10 testing for the steel pickling line within 60 days after achieving maximum production rate, but no later than 180 days after initial revision of the steel throughput in the one (1) hydrochloric acid steel pickling line, utilizing methods as approved by the Commissioner. The PM10 test shall include filterable and condensable PM10. 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.

**Compliance Requirements**

Permits issued under 326 IAC 2-8 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 2-8-4. 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 appropriate corrective actions within a specific time period.

The hydrochloric acid steel pickling line (identified as unit 1) controlled by (2) packed bed scrubbers in series has applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall record the hydrochloric acid (HCl) concentration in the second packed bed scrubber used in conjunction with the steel pickling line at least once per day when the steel pickling line is in operation. The HCl concentration shall be determined by obtaining a sample every day and performing titration. When for any one reading, the HCl concentration in the second packed bed scrubber is below the minimum of 0.1 percent or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. A HCl concentration that is above the minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall record the fan inlet vacuum pressure of the second packed bed scrubber used in conjunction with the steel pickling line at least once per day when the steel pickling line is in operation. When for any one reading, the fan inlet vacuum pressure of the second packed bed scrubber is below the minimum of 2.0 inches of water or a minimum as established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A fan inlet vacuum pressure that is below the minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (c) The Permittee shall record the flow rate of the first and second packed bed scrubbers used in conjunction with the steel pickling line at least once per day when the steel pickling line is in operation. When for any one reading, the flow rate across the first and second packed bed scrubber is less than a normal minimum of 340 gallons per minute for the first packed bed scrubber and less than a normal minimum of 310 gallons per minute for the second packed bed scrubber, as established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A flow rate that is below the minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (d) The instruments used for determining the pressure reading and flow rate shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (e) In the event that a packed bed scrubber malfunction 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 - Response to Excursions or Exceedances shall be considered a deviation from of this permit.

These monitoring conditions are necessary because the two (2) packed bed scrubbers used in conjunction with the hydrochloric acid steel pickling line (identified as Unit 1) must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).

**Conclusion**

The operation of this steel pickling and coil coating processing plant shall be subject to the conditions of the FESOP and NSR No.: 019-21953-00054.

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MMBTU/HR<100  
Boiler**

**Company Name:** Voss Clark dba PGP Corporation  
**Address:** 701 Loop Road, Clark Maritime Center, Jeffersonville, Indiana 47130  
**FESOP and NSR:** 019-21953  
**Plt ID:** 019-00054  
**Reviewer:** ERG/SD  
**Date:** May 15, 2006

Heat Input Capacity  
(MMBtu/hour)

16.8

Potential Throughput  
(MMSCF/year)

144

	Pollutant					
	* PM	* PM10	SO <sub>2</sub>	** NO <sub>x</sub>	VOC	CO
Emission Factor (lb/MMSCF)	1.90	7.60	0.60	100	5.50	84.0
Potential To Emit (tons/year)	0.14	0.55	0.04	7.19	0.40	6.04

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

\*\*Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, and 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All emission factors are based on normal firing.

**METHODOLOGY**

Potential throughput (MMSCF/year) = Heat input capacity (MMBtu/hour) \* 8760 hours/year \* 1 MMSCF/1020 MMBtu

PTE (tons/year) = Potential throughput (MMSCF/year) \* Emission factor (lb/MMSCF) \* 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations**  
**Natural Gas Combustion Only**  
**MMBTU/HR<100**  
**Boiler**

**Company Name:** Voss Clark dba PGP Corporation  
**Address:** 701 Loop Road, Clark Maritime Center, Jeffersonville, Indiana 47130  
**FESOP and NSR:** 019-21953  
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**Reviewer:** ERG/SD  
**Date:** May 15, 2006

**HAPs - Organics**

	<b>Benzene</b>	<b>Dichlorobenzene</b>	<b>Formaldehyde</b>	<b>Hexane</b>	<b>Toluene</b>
Emission Factor (lb/MMSCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	1.51E-04	8.63E-05	5.39E-03	1.29E-01	2.45E-04

**HAPs - Metals**

	<b>Lead</b>	<b>Cadmium</b>	<b>Chromium</b>	<b>Manganese</b>	<b>Nickel</b>
Emission Factor (lb/MMSCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	3.60E-05	7.91E-05	1.01E-04	2.73E-05	1.51E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations  
From Coil Coating Process**

**Company Name:** Voss Clark dba PGP Corporation  
**Address:** 701 Loop Road, Clark Maritime Center, Jeffersonville, Indiana 47130  
**FESOP and NSR:** 019-21953  
**Plt ID:** 019-00054  
**Reviewer:** ERG/SD  
**Date:** May 15, 2006

Process	Process Rate (tons steel/hour)	HCl Emission Factor After Control (lb/ton)	PTE of HCl After Control (tons/year)	PM Emission Factor After control (lb/ton)	PTE of PM After Control (tons/year)	Control Efficiency for HCl (%)	PTE of HCl Before Control (tons/year)	PTE of PM Before Control (tons/year)
Pickling Line	102	0.021	9.38	0.0034	1.52	99%	938.2	151.9

Emission factors are from a stack test conducted on the scrubber exhaust at the source on June 12, 2002.  
 Assume all PM emissions are equal to PM10.

**METHODOLOGY**

PTE After Control (tons/year) = Process rate (tons steel/hour) \* Emission factor (lb/ton) \* 8760 hours/year \* 1 ton/2000 lbs.  
 PTE Before Control (tons/year) = PTE After Control (tons/year) / (1 - HCl Control Efficiency)

**Appendix A: Emission Calculations  
One (1) Diesel Generator**

**Company Name:** Voss Clark dba PGP Corporation  
**Address:** 701 Loop Road, Clark Maritime Center, Jeffersonville, Indiana 47130  
**FESOP and NSR:** 019-21953  
**Pit ID:** 019-00054  
**Reviewer:** ERG/SD  
**Date:** May 15, 2006

Heat Input Capacity  
(MMBtu/hour)

Potential Throughput  
(kgals/year)

S= Weight % Sulfur

0.40

24.6

1.50

	Pollutant					
	* PM	* PM10	SO <sub>2</sub>	NOx	VOC	CO
Emission Factor (lb/MMBtu)	0.31	0.31	0.29	4.41	0.36	0.95
Potential To Emit (tons/year)	0.55	0.55	0.51	7.80	0.64	1.68

\* PM and PM10 emission factors are filterable and condensable PM and PM10 combined.  
 One (1) gallon of No. 2 Fuel Oil has a heating value of 144,000 Btu.

Emission factors are from P-42, Chapter 3.3 Tables 3.3-1, SCC # 2-03-001-01 (10/96).

**METHODOLOGY**

Potential throughput (kgals/year) = Heat input capacity (MMBtu/hour) \* 87601 hours/year \* 1 kgal/1000 gallon \* 1 gallon/0.144 MMBtu  
 PTE (tons/year) = Heat Input Capacity (MMBtu/hour) \* Emission factor (lb/MMBtu) \* 8760 hours/year \* 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations  
One (1) Diesel Generator**

**Company Name:** Voss Clark dba PGP Corporation  
**Address:** 701 Loop Road, Clark Maritime Center, Jeffersonville, Indiana 47130  
**FESOP and NSR:** 019-21953  
**Pit ID:** 019-00054  
**Reviewer:** ERG/SD  
**Date:** May 15, 2006

**HAPs - Organics**

	<b>Benzene</b>	<b>Xylene</b>	<b>Propylene</b>	<b>Formaldehyde</b>	<b>Toluene</b>
Emission Factor (lb/MMBtu)	9.33E-04	2.85E-04	2.58E-03	1.18E-03	4.09E-04
Potential To Emit (tons/year)	1.65E-03	5.04E-04	4.57E-03	2.09E-03	7.24E-04

	<b>Acetaldehyde</b>	<b>Acrolein</b>
Emission Factor (lb/MMBtu)	7.67E-04	9.25E-05
Potential To Emit (tons/year)	1.36E-03	1.64E-04

Emission factors for HAPs are from AP-42, Chapter 3.3, Table 3.3-2 (10/96).

**METHODOLOGY**

PTE of HAPs (tons/year) = Heat input capacity (MMBtu/hour) \* Emission factor (lb/MMBtu) \* 8760 hours/year \* 1 ton/2000 lbs.

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** Voss Clark dba PGP Corporation  
**Address:** 701 Loop Road, Clark Maritime Center, Jeffersonville, Indiana 47130  
**FESOP and NSR:** 019-21953  
**Plt ID:** 019-00054  
**Reviewer:** ERG/SD  
**Date:** May 15, 2006

**POTENTIAL TO EMIT IN TONS PER YEAR**

<b>Emission Units</b>	<b>PM</b>	<b>PM10</b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>
Combustion Units	0.14	0.55	0.04	7.19	0.40	6.04	1.35E-01
Pickling Line	1.52	1.52			0.00		9.38
* Coil Coating Line							
Diesel Generator	0.55	0.55	0.51	7.80	0.64	1.68	1.11E-02
<b>TOTAL</b>	<b>2.21</b>	<b>2.62</b>	<b>0.55</b>	<b>15.0</b>	<b>1.04</b>	<b>7.72</b>	<b>9.53</b>

\* The material used in the coil coating line does not contain any VOCs or HAPs.