



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: October 16, 2006  
RE: Worthington Steel Company / 127-22017-00040  
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 OFFICE OF AIR QUALITY

**Worthington Steel Company  
100 Worthington Drive  
Porter, Indiana 46304**

(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.

Operation Permit Renewal No.: F127-22017-00040	
Original signed by:  Nisha Sizemore, Branch Chief Office of Air Quality	Issuance Date: October 16, 2006  Expiration Date: October 16, 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 steel slitting operation.

Authorized individual:	Operations Manager
Source Address:	100 Worthington Drive, Porter, Indiana 46304
Mailing Address:	100 Worthington Drive, Porter, Indiana 46304
General Source Phone:	(219) 929-4000
SIC Code:	3399 and 3316
Source Location Status:	Porter
Source Status:	Nonattainment for 8-hour Ozone Standard Attainment for all other criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

### 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) natural gas fired boiler, identified as # 240326, with a maximum heat input rate of 19.9 million British thermal units (MMBtu) per hour, exhausting through one (1) stack identified as S01, installed in 1990.
- (b) One (1) scale breaker with a maximum capacity of 145 tons per hour, identified as P02, with a fabric filter to control PM<sub>10</sub> emissions, and exhausting to a point designated as CD02, inside the building.
- (c) One (1) push/pull hydrochloric acid (HCl) pickling line with maximum capacity of 145 tons per hour, identified as P01, with an acid absorber system in line with a packed tower scrubber to control PM<sub>10</sub> and HCl emissions, and exhausting through one (1) stack identified as CD01.
- (d) The following storage tanks containing HAPs:
  - (1) three (3) raw acid tanks, identified as T01, T02 and T11, each with a maximum capacity of 17,000 gallons; and
  - (2) three (3) spent acid tanks, identified as T03, T04, and T12, each with a maximum capacity of 17,000 gallons.

### 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) The following natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;

- (1) one (1) 8.64 MMBtu Weather rite natural gas-fired heater, installed in 2002; and
  - (2) sixteen (16) natural gas-fired space heaters with a combined heat input rate of 36.0 MMBtu per hour.
- (b) The following VOC storage tanks:
- (1) one (1) Quisol storage tank, identified as T05, with a maximum capacity of 300 gallons;
  - (2) one (1) slushing oil storage tank, identified as T06, with a maximum capacity of 8,813 gallons;
  - (3) one (1) waste oil storage tank, identified as T07, with a maximum capacity of 8,813 gallons;
  - (4) one (1) hydraulic oil storage tank, identified as T08, with a maximum capacity of 564 gallons;
  - (5) one (1) diesel fuel storage tank, identified as T09, with a maximum capacity of 564 gallons;
  - (6) one (1) lubricating oil storage tank, identified as T10, with a maximum capacity of 300 gallons;
  - (7) one (1) Towedraw A-840 dispenser tank, with a maximum capacity of 60 gallons;
  - (8) one (1) Vactra # 2 dispenser tank, with a maximum capacity of 60 gallons;
  - (9) one (1) Mobil Fluid 424 dispenser tank, with a maximum capacity of 60 gallons;
  - (10) one (1) Gearlube HD 80W90 dispenser tank, with a maximum capacity of 60 gallons;
  - (11) one (1) Citgo Hydraulic A/W 32 dispenser tank, with a maximum capacity of 60 gallons;
  - (12) one (1) Mobil Gear 626 dispenser tank, with a maximum capacity of 60 gallons;
  - (13) one (1) Citgo Supergaurd 10W30 dispenser tank, with a maximum capacity of 60 gallons;
  - (14) one (1) Nalco Steelshield 6292 dispenser tank, with a maximum capacity of 60 gallons;
  - (15) one (1) solvent 140 storage tank with a maximum capacity of 550 gallons;
  - (16) two (2) propane storage tanks, located outside the skid department, each with a maximum capacity of 1000 gallons;
  - (17) one (1) portable tote for EP220 gearbox oil, with a maximum capacity of 150 gallons;
  - (18) one (1) portable tote for hydraulic oil, with a maximum capacity of 250 gallons; and
  - (19) one (1) portable tote for used oil, with a maximum capacity of 250 gallons.
- (c) one (1) lime slurry storage tank, identified as T11, with a maximum capacity of 4000 gallons.
- (d) One (1) maintenance shop parts cleaner.
- (e) One (1) Danly press with maximum striking force of 1500 tons.
- (f) Slitter consisting of:
- (1) three (3) 72" slitters; and
  - (2) one (1) 36" slitter.
- (g) Mills consisting of:
- (1) one (1) 14" mill;
  - (2) one (1) 20" mill; and
  - (3) one (1) Temper mill.

- (h) One (1) cut to length line operation.
- (i) One (1) pickle line oiler.
- (j) One (1) skid department woodworking operation.
- (k) One (1) solvent wipe cleaning operation.

**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 127-22017-00040 is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.
- (b) 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.

### 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;
- (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)]

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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than 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)]**

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- (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]**

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

or

Northwest Regional Office:  
Telephone No.: 1-888-209-8892 (ask for Office of Air Quality) or,  
Telephone No.: 219-757-0265 (ask for Office of Air Quality)  
Facsimile No.: 219-757-0267

- (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.

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 previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) 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 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, IN 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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]

- (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)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (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, on a rolling five (5) year basis, which document all such changes and emission 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]**

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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]**

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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][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 volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) 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 regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
- (3) 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
- (4) 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) The potential to emit 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 render 326 IAC 2-2 and 326 IAC 2-3 not applicable.

(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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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]

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 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

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

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing 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.10 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.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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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. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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.12 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.13 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 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.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on April 24, 2002.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### **C.15 Risk Management Plan [326 IAC 2-8-4] [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.16 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.17 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18 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.19 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.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

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

One (1) natural gas fired boiler, identified as # 240326, with a maximum heat input rate of 19.9 million British thermal units (MMBtu) per hour, exhausting through one (1) stack identified as S01, installed in 1990.

(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 General Provisions Relating to NSPS [326 IAC 12-1]

Pursuant to the New Source Performance Standards (NSPS), 326 IAC 12, the Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each day.

#### D.1.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 19.9 MMBtu per hour heat input boiler shall be limited to 0.5 pounds per MMBtu heat input.

This limitation is based on the following equation:

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

where:  $P_t$  = pounds of PM emitted per MMBtu heat input, and  
 $Q$  = total source maximum operating capacity rating in MMBtu per hour heat input

#### D.1.3 Particulate Matter less than 10 microns ( $PM_{10}$ ) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4,  $PM_{10}$  shall not exceed 0.50 pounds of  $PM_{10}$  per MMBtu of heat input for the natural gas boiler (ID# 240326).

#### D.1.4 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 its control device.

### Compliance Determination Requirements

#### D.1.5 Natural Gas

In order to demonstrate compliance with D.1.1, D.1.2 and D.1.3, the source shall burn only natural gas.

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

### **D.1.6 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below.
  - (1) The amount of natural gas combusted each day, and
  - (2) Calendar dates covered in the compliance determination period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-8-4(10)]

One (1) scale breaker with a maximum capacity of 145 tons per hour, identified as P02, with a fabric filter to control PM<sub>10</sub> emissions, and exhausting to a point designated as CD02, inside the building.

(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 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the scale breaker (P02) shall not exceed 55.15 pounds per hour when operating at a process weight rate of 145 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

$$E = 55.0 P^{0.11} - 40$$

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

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

Pursuant to F127-12889-00040, issued August 10, 2001, particulate matter (PM) emissions from the scale breaker (P02) shall not exceed 28.3 pounds of PM per hour. This limit is structured such that when including emissions from all other emission units and insignificant activities, the source wide total PM emissions remain below 250 tons per twelve (12) consecutive month period.

Compliance with this limit renders the requirements of 326 IAC 2-2 (PSD) not applicable.

#### D.2.3 Particulate Matter less than 10 microns (PM<sub>10</sub>) [326 IAC 2-8-4]

Particulate matter less than 10 microns (PM<sub>10</sub>) emissions from the picking line (P01) shall not exceed 11.07 pounds of PM<sub>10</sub> per hour.

This limit is structured such that when including emissions from all other emission units and insignificant activities, the source wide total PM<sub>10</sub> emissions remain below 100 tons per twelve (12) consecutive month period. Compliance with these limits satisfies the requirements of 326 IAC 2-8-4 (FESOP).

#### D.2.4 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 its control device.

### Compliance Determination Requirements

#### D.2.5 Particulate Control

Pursuant to F127-5229-00040, issued December 10, 1996, and in order to comply with D.2.1, D.2.2 and D.2.3, the fabric filter for particulate control shall be in operation and control emissions from the scale breaker (P02) at all times that the scale breaker (P02) is in operation and exhausting to the atmosphere.

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

### **D.2.6 Visible Emissions Notations**

---

- (a) Visible emission notations of the scale breaker process (PO<sub>2</sub>) stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

### **D.2.7 Parametric Monitoring**

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- (a) The Permittee shall record the pressure drop across the fabric filter used in conjunction with the scale breaker operation (PO<sub>2</sub>), at least once per day during normal operation when exhausting to the atmosphere. When for any one reading, the pressure drop across the fabric filter is outside the normal range of 0.1 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure 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.2.8 Fabric Filter Inspections**

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An inspection shall be performed each calendar quarter of all fabric filters controlling the scale breaker operation (PO<sub>2</sub>) during normal operation when exhausting to the atmosphere. A fabric filter inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective fabric filters shall be replaced.

### **D.2.9 Broken or Failed Fabric Filter Detection**

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- (a) For a single compartment fabric filters controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).

- (b) For a single compartment fabric filters controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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 can be indicated by a significant drop in the fabric filter's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

#### **D.2.10 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the scale breaker (P02) stack exhaust once per day, when exhausting to the atmosphere.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the pressure drop across the fabric filter during normal operation once per day, when exhausting to the atmosphere.
- (c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected, when exhausting to the atmosphere.
- (d) To document compliance with Condition D.2.4, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) One (1) push/pull hydrochloric acid (HCl) pickling line with maximum capacity of 145 tons per hour, identified as P01, with an acid absorber system in line with a packed tower scrubber to control PM<sub>10</sub> and HCl emissions, and exhausting through one (1) stack identified as CD01.
- (b) The following storage tanks containing VOCs and HAPs:
  - (1) three (3) raw acid tanks, identified as T01, T02 and T11, each with a maximum capacity of 17,000 gallons; and
  - (2) three (3) spent acid tanks, identified as T03, T04, and T12, each with a maximum capacity of 17,000 gallons.

(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.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 55.15 pounds per hour when operating at a process weight rate of 145 pounds per hour.

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

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

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

#### D.3.2 Particulate Matter (PM) [326 IAC 2-2]

Pursuant to F127-12889-00040, issued August 10, 2001, particulate matter (PM) emissions from the picking line (P01) shall not exceed 28.3 pounds of PM per hour. This limit is structured such that when including emissions from all other emission units and insignificant activities, the source wide total PM emissions remain below 250 tons per twelve (12) consecutive month period.

Compliance with this limit renders the requirements of 326 IAC 2-2 (PSD) not applicable.

#### D.3.3 Particulate Matter less than 10 microns (PM<sub>10</sub>) [326 IAC 2-8-4]

Particulate matter less than 10 microns (PM<sub>10</sub>) emissions from the picking line (P01) shall not exceed 11.07 pounds of PM<sub>10</sub> per hour. This limit is structured such that when including emissions from all other emission units and insignificant activities, the source wide total PM<sub>10</sub> emissions remain below 100 tons per twelve (12) consecutive month period.

Compliance with these limits satisfies the requirements of 326 IAC 2-8-4 (FESOP).

#### D.3.4 Hazardous Air Pollutants (HAPs)

Hydrochloric acid (HCl) emission from the pickling line (P01) shall not exceed 1.62 pounds per hour.

This limit is structured such that when including emissions from all other emission units and insignificant activities, the source wide total HCl emissions remain below 10 tons per twelve (12) consecutive month period. Compliance with these limits satisfies the requirements of 326 IAC 2-8-4 (FESOP).

**D.3.5 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 its control device.

**Compliance Determination Requirements**

**D.3.6 Control Equipment Operation [326 IAC 2-8-4(3)][326 IAC 2-8-5]**

---

Pursuant to F127-5229-00040, issued December 10, 1996, and in order to comply with D.3.1, D.3.2, D.3.3 and D.3.4, the acid absorber system for HCl emissions control and the packed tower scrubber for PM, PM<sub>10</sub> and HCl emissions control shall be in operation and control emissions from the pickling line at all times that the pickling line is in operation.

**D.3.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]**

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Prior to November 4, 2009, the Permittee shall perform hydrogen chloride (HCl) emissions testing for the pickle line (P01) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent 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.3.8 Visible Emissions Notations**

---

- (a) Visible emission notations of the pickling line stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

**D.3.9 Parametric Monitoring**

---

- (a) The Permittee shall record pressure and scrubbing liquid (water) flow rate readings from the packed tower scrubber controlling HCl, at least once per day when the pickling line is in operation. The pressure drop across the packed tower scrubber shall be maintained within the range of 2.0 to 6.0 inches of water and the flow rate for scrubbing liquid shall be maintained with at least a minimum 60 gallons per minute. The concentration of HCl in the water shall be monitored once per day and when it reaches a concentration of 10 grams per liter the water will be discharged and new water added. When the pressure reading across the packed tower scrubber is outside the range of 2.0 to 6.0 inches of

water, or if the flow rate for scrubbing liquid is less than 60 gallons per minute, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.

- (b) The instrument used for determining the pressure 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.3.10 Scrubber Inspections [326 IAC 2-8-5(3)][326 IAC 2-8-4(3)]**

---

- (a) An inspection shall be performed each calendar quarter of the scrubber controlling PM, PM<sub>10</sub> and HCl emissions from the pickling line (P02). Inspections required by this condition shall not be performed in consecutive months.
- (b) If an abnormal or improper condition is found during an inspection, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Discovery of an abnormal or improper condition 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.3.11 Scrubber Failure Detection**

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In the event that scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

#### **D.3.12 Record Keeping Requirements**

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- (a) To document compliance with Condition D.3.8, the Permittee shall maintain records of daily visible emission notations of the pickling line operation stack exhaust.
- (b) To document compliance with Condition D.3.9, the Permittee shall maintain the following:
  - (1) daily records of the pressure drop readings across the packed tower scrubber during normal operation,
  - (2) daily records of the scrubbing liquid flow rate, and
- (c) To document compliance with Condition D.3.10, the Permittee shall maintain records of the results of the inspections required under Condition D.3.10 and the dates of the inspection.
- (d) To document compliance with Condition D.3.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**SECTION D.4**

**FACILITY OPERATION CONDITIONS**

**The following Insignificant Activities as defined in 326 IAC 2-7-1(21):**

- (a) The following natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) one (1) 8.64 MMBtu Weather rite natural gas-fired heater, installed in 2002; and
  - (2) sixteen (16) natural gas-fired space heaters with a combined heat input rate of 36.0 MMBtu per hour.
  
- (b) The following VOC storage tanks:
  - (1) one (1) Quisol storage tank, identified as T05, with a maximum capacity of 300 gallons;
  - (2) one (1) slushing oil storage tank, identified as T06, with a maximum capacity of 8,813 gallons;
  - (3) one (1) waste oil storage tank, identified as T07, with a maximum capacity of 8,813 gallons;
  - (4) one (1) hydraulic oil storage tank, identified as T08, with a maximum capacity of 564 gallons;
  - (5) one (1) diesel fuel storage tank, identified as T09, with a maximum capacity of 564 gallons;
  - (6) one (1) lubricating oil storage tank, identified as T10, with a maximum capacity of 300 gallons;
  - (7) one (1) Towedraw A-840 dispenser tank, with a maximum capacity of 60 gallons;
  - (8) one (1) Vactra # 2 dispenser tank, with a maximum capacity of 60 gallons;
  - (9) one (1) Mobil Fluid 424 dispenser tank, with a maximum capacity of 60 gallons;
  - (10) one (1) Gearlube HD 80W90 dispenser tank, with a maximum capacity of 60 gallons;
  - (11) one (1) Citgo Hydraulic A/W 32 dispenser tank, with a maximum capacity of 60 gallons;
  - (12) one (1) Mobil Gear 626 dispenser tank, with a maximum capacity of 60 gallons;
  - (13) one (1) Citgo Supergaurd 10W30 dispenser tank, with a maximum capacity of 60 gallons;
  - (14) one (1) Nalco Steelshield 6292 dispenser tank, with a maximum capacity of 60 gallons;
  - (15) one (1) solvent 140 storage tank with a maximum capacity of 550 gallons;
  - (16) two (2) propane storage tanks, located outside the skid department, each with a maximum capacity of 1000 gallons;
  - (17) one (1) portable tote for EP220 gearbox oil, with a maximum capacity of 150 gallons;
  - (18) one (1) portable tote for hydraulic oil, with a maximum capacity of 250 gallons; and
  - (19) one (1) portable tote for used oil, with a maximum capacity of 250 gallons.
  
- (c) One (1) lime slurry storage tank, identified as T11, with a maximum capacity of 4000 gallons.
  
- (d) One (1) maintenance shop parts cleaner.
  
- (e) One (1) Danly press with maximum striking force of 1500 tons.
  
- (f) Slitter consisting of:
  - (1) three (3) 72" slitters;
  - (2) one (1) 36" slitter.
  
- (g) Mills consisting of:
  - (1) one (1) 14" mill;
  - (2) one (1) 20" mill;
  - (3) one (1) Temper mill.

**Insignificant Activities as defined in 326 IAC 2-7-1(21) (continued):**

- (h) One (1) cut to length line operation.
- (i) One (1) pickle line oiler.
- (j) One (1) skid department woodworking operation.
- (k) One (1) solvent wipe cleaning operation.

(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.4.1 Record Keeping and Reporting Requirements [326 IAC 8-9-6(a) and (b)]**

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- (a) Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall:
  - (1) maintain the following information for the fifteen (15) volatile organic liquid (VOL) storage tanks:
    - (A) The vessel identification number,
    - (B) The vessel dimensions, and
    - (C) The vessel capacity.
  - (2) Submit to IDEM, OAQ, a report containing the above information; and
  - (3) Keep all records for the life of the vessel.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

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

Source Name:                   Worthington Steel Company  
Source Address:               100 Worthington Drive, Porter, Indiana 46304  
Mailing Address:              100 Worthington Drive, Porter, Indiana 46304  
FESOP No.:                    F127-22017-00040

**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: Worthington Steel Company  
Source Address: 100 Worthington Drive, Porter, Indiana 46304  
Mailing Address: 100 Worthington Drive, Porter, Indiana 46304  
FESOP No.: F127-22017-00040

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• 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</li><li>• 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</li></ul>
---

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 <sub>10</sub> , 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**

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

Source Name:           Worthington Steel Company  
 Source Address:       100 Worthington Drive, Porter, Indiana 46304  
 Mailing Address:      100 Worthington Drive, Porter, Indiana 46304  
 FESOP No.:            F127-22017-00040

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

<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 for a Part 70 Operating Permit

Source Name: Worthington Steel  
Source Location: 100 Worthington Steel Drive, Porter, Indiana 46304  
County: Porter  
SIC Code: 3399 and 3316  
Operation Permit No.: T127-22017-00040  
Permit Reviewer: Janet Mobley

On August 26, 2006, the Office of Air Quality (OAQ) had a notice published in the The Times, Munster, Indiana, stating that Worthington Steel had applied for a FESOP Operating Permit Renewal to operate a steel pickling and steel slitting operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

In addition, upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

- (1) The Asbestos Abatement Projects Condition C.8 (g) is revised.
  - (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.~~

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) Renewal

#### Source Background and Description

Source Name: Worthington Steel Company  
Source Location: 100 Worthington Drive, Porter, Indiana 46304  
County: Porter  
SIC Code: 3399 and 3316  
Operation Permit No.: F127-22017-00040  
Permit Reviewer: Janet Mobley

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Worthington Steel Company relating to the steel pickling and steel slitting operation.

#### Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) natural gas fired boiler, identified as # 240326, with a maximum heat input rate of 19.9 million British thermal units (MMBtu) per hour, exhausting through one (1) stack identified as S01, installed in 1990.
- (b) One (1) scale breaker with a maximum capacity of 145 tons per hour, identified as P02, with a fabric filter to control PM<sub>10</sub> emissions, and exhausting to a point designated as CD02, inside the building.
- (c) One (1) push/pull hydrochloric acid (HCl) pickling line with maximum capacity of 145 tons per hour, identified as P01 with an acid absorber system (installed in 2003) in line with a packed tower scrubber to control PM<sub>10</sub> and HCl emissions, and exhausting through one (1) stack identified as CD01.
- (d) The following storage tanks containing VOCs and HAPs:
  - (1) three (3) raw acid tanks, identified as T01, T02 and T11, each with a maximum capacity of 17,000 gallons; and
  - (2) three (3) spent acid tanks, identified as T03, T04, and T12, each with a maximum capacity of 17,000 gallons.

#### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this renewal review process.

#### New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities that required advanced source modification approval at this source during this renewal review process.

## Insignificant Activities

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

- (a) The following natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
  - (1) one (1) 8.64 MMBtu Weather rite natural gas-fired heater, installed in 2002; and
  - (2) sixteen (16) natural gas-fired space heaters with a combined heat input rate of 36.0 MMBtu per hour.
  
- (b) The following VOC storage tanks:
  - (1) one (1) Quisol storage tank, identified as T05, with a maximum capacity of 300 gallons;
  - (2) one (1) slushing oil storage tank, identified as T06, with a maximum capacity of 8,813 gallons;
  - (3) one (1) waste oil storage tank, identified as T07, with a maximum capacity of 8,813 gallons;
  - (4) one (1) hydraulic oil storage tank, identified as T08, with a maximum capacity of 564 gallons;
  - (5) one (1) diesel fuel storage tank, identified as T09, with a maximum capacity of 564 gallons;
  - (6) one (1) lubricating oil storage tank, identified as T10, with a maximum capacity of 300 gallons;
  - (7) one (1) Towedraw A-840 dispenser tank, with a maximum capacity of 60 gallons;
  - (8) one (1) Vactra # 2 dispenser tank, with a maximum capacity of 60 gallons;
  - (9) one (1) Mobil Fluid 424 dispenser tank, with a maximum capacity of 60 gallons;
  - (10) one (1) Gearlube HD 80W90 dispenser tank, with a maximum capacity of 60 gallons;
  - (11) one (1) Citgo Hydraulic A/W 32 dispenser tank, with a maximum capacity of 60 gallons;
  - (12) one (1) Mobil Gear 626 dispenser tank, with a maximum capacity of 60 gallons;
  - (13) one (1) Citgo Supergaurd 10W30 dispenser tank, with a maximum capacity of 60 gallons;
  - (14) one (1) Nalco Steelshield 6292 dispenser tank, with a maximum capacity of 60 gallons;
  - (15) one (1) solvent 140 storage tank with a maximum capacity of 550 gallons;
  - (16) two (2) propane storage tanks, located outside the skid department, each with a maximum capacity of 1000 gallons;
  - (17) one (1) portable tote for EP220 gearbox oil, with a maximum capacity of 150 gallons;
  - (18) one (1) portable tote for hydraulic oil, with a maximum capacity of 250 gallons; and
  - (19) one (1) portable tote for used oil, with a maximum capacity of 250 gallons.
  
- (c) one (1) lime slurry storage tank, identified as T11, with a maximum capacity of 4000 gallons.
  
- (d) One (1) maintenance shop parts cleaner.
  
- (e) One (1) Danly press with maximum striking force of 1500 tons.
  
- (f) Slitter consisting of:
  - (1) three (3) 72" slitters; and
  - (2) one (1) 36" slitter.
  
- (g) Mills consisting of:

- (1) one (1) 14" mill;
  - (2) one (1) 20" mill; and
  - (3) one (1) Temper mill.
- (h) One (1) cut to length line operation.
- (i) One (1) pickle line oiler.
- (j) One (1) skid department woodworking operation.
- (k) One (1) solvent wipe cleaning operation.

### Existing Approvals

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

- (a) AA 127-18882, issued May 26, 2004,
- (b) AA 127-17833, issued July 1, 2003,
- (c) F127-12889-00040, issued August 10, 2001,

The following terms and conditions from F127-12889-00040 have been determined not applicable, and therefore not incorporated into this renewal FESOP:

- (a) Condition D.2.2 – Particulate Matter (PSD) [326 IAC 2-2]. The PM emissions in this condition from the scale breaker (P02) were limited to less than 2.74 pounds per hour (equivalent to maximum PM emissions of 12.0 tons per year). It was brought to OAQ's attention that the PM limit needed to be revised prior to issuance of the permit. The limits were changed in the Addendum to the Technical Support Document (ATSD) but inadvertently not revised in the permit (F123-12889-00021). Therefore the revised limits listed in the ATSD for F123-12889-00021 have been carried over to be included in this renewal F127-22017-00021.
- (b) Condition D.2.3 – Particulate Matter less than 10 microns (PM<sub>10</sub>) [326 IAC 2-8-4]. The PM 10 emissions in this condition from the scale breaker (P02) were limited to less than 3.0 pounds per hour. It was brought to OAQ's attention that the PM<sub>10</sub> limit needed to be revised prior to issuance of the permit. The limits were changed in the Addendum to the Technical Support Document (ATSD) but inadvertently not revised in the permit (F123-12889-00021). Therefore the revised limits listed in the ATSD for F123-12889-00021 have been carried over to be included in this renewal F127-22017-00021.
- (c) Condition D.3.2 – Particulate Matter (PSD) [326 IAC 2-2]. The PM emissions in this condition from the scale breaker (P01) were limited to less than 2.74 pounds per hour (equivalent to maximum PM emissions of 12.0 tons per year). It was brought to OAQ's attention that the PM limit needed to be revised prior to issuance of the permit. The limits were changed in the Addendum to the Technical Support Document (ATSD) but inadvertently not revised in the permit (F123-12889-00021). Therefore the revised limits listed in the ATSD for F123-12889-00021 have been carried over to be included in this renewal F127-22017-00021.
- (d) Condition D.3.3 – Particulate Matter less than 10 microns (PM<sub>10</sub>) [326 IAC 2-8-4]. The PM 10 emissions in this condition from the scale breaker (P01) were limited to less than 3.0 pounds per hour. It was brought to OAQ's attention that the PM<sub>10</sub> limit needed to be revised prior to issuance of the permit. The limits were changed in the Addendum to the Technical Support Document (ATSD) but inadvertently not revised in the permit (F123-12889-00021). Therefore the revised limits listed in the ATSD for F123-12889-00021

have been carried over to be included in this renewal F127-22017-00021.

- (e) Condition D.1.6 - Reporting Requirements (Semi-Annual Reports). The New Source Performance Standard for Industrial, Commercial and Institutional Steam Generating Units (NSPS Subpart Dc) states that any report required by the rule must be submitted semi-annually. However, only record keeping is required for the natural gas-fired boiler (Unit ID#240326), and thus, the reporting requirements have been removed.
- (f) Condition D.1.6 – Reporting Requirements (Natural gas-fired Boiler Certification). The natural gas-fired boiler certification requirement for unit #240326, submitted every 6 months, was removed from the permit. Compliance determination for natural gas fuel usage was included in Condition D.1.5, which the Permittee is required to certify compliance in the Annual Compliance Certification.

All other conditions from previous approvals are incorporated into this FESOP.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on November 10, 2005.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (5 pages).

### Potential To Emit

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

Pursuant to FESOP permit F127-5229-00040, issued December 10, 1996, the table below reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	171.94
PM <sub>10</sub>	173.34
SO <sub>2</sub>	0.2
VOC	12.69
CO	20.5
NO <sub>x</sub>	24.5

Note: For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration

HAP's	Potential To Emit (tons/year)
Hydrochloric Acid	358.74
Hexane	0.44
Formaldehyde	0.018
TOTAL	359.2

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM<sub>10</sub> are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels, and has been issued a FESOP. This source will be issued a renewal of their Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (d) Fugitive Emissions  
 Since this steel pickling plant, which does not produce steel, is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	3.0
PM <sub>10</sub>	0.9
SO <sub>2</sub>	0.03
VOC	0.3
CO	4.6
NO <sub>x</sub>	5.5
Lead	0
HAPs (as HCl)	0.7

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Boiler # 240326	0.20	0.70	0.10	0.50	7.30	8.70	0.16
Pickle Line (P01)	124.0	49.0	0.00	0.00	0.00	0.00	7.12 (HCl)
Scale Breaker (P02)	124.0	49.0	0.00	0.00	0.00	0.00	0.00
Storage Tanks	0.00	0.00	0.00	0.00	0.00	0.00	0.45 (HCl)
Fugitive Emissions	0.00	0.00	0.00	11.29	0.00	0.00	1.24 (HCl)
Insignificant Combustion	0.30	1.20	0.10	0.90	13.20	15.80	0.29
Total Emissions	< 250	< 100	< 100	< 25	< 100	< 100*	< 10 (HCl) < 25 (all HAPs)

\* For title V purposes, the major stationary source threshold level for oxides of nitrogen (NO<sub>x</sub>) in severe non-attainment areas (Lake & Porter counties) has been increased from 25 tons per year to 100 tons per year.

### County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM <sub>10</sub>	Unclassifiable
PM <sub>2.5</sub>	Non-attainment
SO <sub>2</sub>	Unclassifiable (portions only)
NO <sub>x</sub>	Attainment
1-Hour Ozone	Severe Non-attainment
8-Hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
- (1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO<sub>x</sub> threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Porter County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
  - (2) VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Porter County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset.
- (b) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Porter County as nonattainment for PM<sub>2.5</sub>. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District

of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.

- (c) Porter County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

### **Federal Rule Applicability**

- (a) Pursuant to FESOP 127-5229-00040, issued on December 10, 1996, the one (1) natural gas-fired boiler, identified as # 240326, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c through 60.48c, Subpart Dc, (Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units) because it was constructed after June 9, 1989, and has a maximum design heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour. However, since this boiler only combusts natural gas, it is subject only to the record keeping requirements under 40 CFR 60.48c (a) and (g). The applicable record keeping requirements are as follows:
  - (1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each day.
- (b) The two (2) raw acid and three (3) spent acid 17,000 gallon storage tanks at this facility are not subject to the requirements of the New Source Performance Standard (40 CFR Part 60.112b, Subpart Kb and 326 IAC 12) because the capacities of the storage tanks are less than 75 cubic meters (19,800 gallons).
- (c) The oil storage tanks at this facility are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.112b, Subpart Kb), because the capacity of each of the storage tank is less than 75 cubic meters (19,800 gallons).
- (d) This steel pickling facility is not subject to the NESHAP (National Emission Standards for Hazardous Air Pollutants), 40 CFR Part 63, Subpart CCC (Steel Pickling – HCl Process) because the source is not a major source of HAPs. The Permittee has chosen to limit source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively.

### **State Rule Applicability – Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

Pursuant to FESOP 127-12889-00040, issued August 10, 2001, and 326 IAC 2-2 (PSD), the PM emissions from the scale breaker (P02) shall not exceed 28.3 pounds of PM per hour and PM emissions from the pickling line (P01) shall not exceed 28.3 pounds per PM per hour. The source will be in compliance with the limitations by controlling PM emissions with a fabric filter for each of the facilities (P01 and P02). PM emissions are limited such that the source wide PM emissions are less than 250 tons per twelve (12) consecutive month period, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

#### **326 IAC 2-3 Emission Offset**

Porter County has been designated as non-attainment 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 PM<sub>2.5</sub> Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM<sub>2.5</sub> major NSR regulations, states should assume that a major stationary source's PM<sub>10</sub> emissions represent PM<sub>2.5</sub> emissions. IDEM will use the PM<sub>10</sub> nonattainment

major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM<sub>2.5</sub> NAAQS. A major source in a nonattainment area as a source that emits or has the potential to emit 100 tpy of any regulated pollutant. The Permittee has a limited potential to emit of PM<sub>10</sub> below 100 tpy. Therefore, assuming that PM<sub>10</sub> emissions represent PM<sub>2.5</sub> emissions, 326 IAC 2-3 does not apply.

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

Pursuant to FESOP 127-18882-00040, issued on May 26, 2004, this source is no longer subject to 326 IAC 2-6 because it has the does not have the potential to emit VOC and NO<sub>x</sub> into the air at levels greater than twenty-five (25) tons per year, even though it is located Porter County. Therefore, the requirements of 326 IAC 2-6 (Emission Reporting) do not apply.

**326 IAC 2-8-4 (FESOP)**

Pursuant to FESOP 127-5229-00040, issued on December 10, 1996, this source is subject to 326 IAC 2-8-4 (FESOP). PM<sub>10</sub> emissions from scale breaker (P02) and the pickling line (P01) will each be controlled at 11.07 lb/hr, equivalent to 49.0 tons per year, by utilizing the fabric filter and the packed tower scrubber, respectively, as control devices. Hydrochloric acid (HCl) emissions will be controlled at 1.62 lb/hr, equivalent to 7.13 tons per year, by utilizing the packed tower scrubber. Therefore, the requirements of 326 IAC 2-7 do not apply.

**326 IAC 5-1 (Opacity Limitations)**

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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.

**326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)**

The source is not subject to the requirements of 326 IAC 8-7, because the total potential to emit of VOC from the source is less than 25 tons per year.

**State Rule Applicability - Individual Facilities**

**19.9 MMBtu Natural Gas-fired Boiler**

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

Pursuant to FESOP 127-5229-00040, issued on December 10, 1996, the one (1) natural gas fired boiler (ID No. 240326 constructed in 1990), with a heat input capacity rating of 19.9 MMBtu per hour, is subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

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

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input  
Q = total source max. operation capacity rating = 19.9 MMBtu/hr

$$Pt = 1.09/19.9^{0.26} = 0.50 \text{ lbs PM/MMBtu}$$

Compliance calculation:

Potential PM emissions for boiler # 240326 = 1.9 lb PM/MMCF \* (1/1000) (MMCF/MMBtu) = 0.0019 lbs PM/MMBtu

Potential PM emissions for boiler # 240326 (0.0019 lbs PM/MMBtu) are less than allowable 0.5 lbs PM/MMBtu, therefore the one (1) boiler (ID No. 240326) can comply with the requirements of 326 IAC 6-2-4.

### **Pickling Line and Scale Breaker**

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

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Pursuant to FESOP 127-5229-00040, issued on December 10, 1996, all current operations at this plant were constructed before the rule applicability date of July 27, 1997. Therefore, these facilities are not subject to the requirements of 326 IAC 2-4.1-1.

#### **326 IAC 6-3-2 (Process Operations)**

Pursuant to FESOP 127-5229-00040, issued on December 10, 1996, the particulate matter (PM) from the HCl pickling line (P01) and scale breaker (P02) shall be limited by the following:

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

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

$$55.15 = 55.0 (145)^{0.11} - 40 \quad \text{where } E = 55.15 \\ P = 145$$

Based on the above equation, particulate matter emissions from each, the scale breaker and the pickling line shall be limited to 55.15 pounds per hour. The scale breaker (P02) can comply with the rule by using the fabric filter, and the pickling line can comply with the rule by using the packed tower scrubber for PM control.

The fabric filter shall be in operation at all times while the scale breaker is in operation, in order to comply with this limit. The packed tower scrubber shall be in operation at all times while the scale breaker is in operation, in order to comply with this limit.

### **Raw Acid and Spent Acid Storage Tanks**

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

The two (2) raw acid and five (5) spent acid storage tanks, each with a maximum capacity of 17,000 gallons, are not subject to the requirements of 326 IAC 8-9-1, because they do not contain volatile organic liquids. Therefore, 326 IAC 8-9-1 does not apply. No other requirements apply to these storage tanks.

### **Oil storage tanks**

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

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirements of the rule if located in Clark, Floyd, Lake or Porter Counties. Each of the fifteen (15) volatile organic liquid (VOL) tanks at the source has a storage capacity less than 39,000 gallons. Therefore, the fifteen (15) VOL storage tanks at the source are only subject to the record keeping and reporting requirements of 326 IAC 8-9-6(a) and (b) and are exempt from other provisions of this rule.

## Testing Requirements

Compliance stack tests were performed for the HCl emissions from the pickling line (P01) to demonstrate compliance with the permit conditions of F127-5229-00040, issued December 10, 1996. Tests were conducted at this source on October 28, 1999 and November 4, 2004. Both tests were determined to be acceptable to IDEM, OAQ and the emission unit was found to be in compliance. The November 4, 2004 stack test showed compliance when using an acid absorber system and packed tower scrubber to control for HCl emissions. Testing is required on the pickling line operation every five years, and the next test must be completed prior to November 4, 2009. Testing will not be required on the scale breaker (P02) as the fabric filter vents inside the building.

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

1. The scale breaker operation (P02) has applicable compliance monitoring conditions as specified below:
  - (a) Once per day visible emissions notations of the scale breaker exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. When abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.
  - (b) The Permittee shall record the pressure drop across the fabric filter controlling the scale breaker operation at least once per day during normal operation when exhausting to the atmosphere. The pressure drop across the fabric filter shall be maintained within the range of 0.1 to 4.0 inches of water, or a range established in the latest stack test. When the pressure reading is outside of the above mentioned range for any one reading, the Permittee shall take reasonable

response steps in accordance with Section C – Response to Excursions or Exceedances.

These monitoring conditions are necessary because the fabric filter for the scale breaker operation must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-8 (FESOP).

2. The pickling line operation (P01) has applicable compliance monitoring conditions as specified below:
  - (a) Once per day visible emissions notations of the pickling line stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. When abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.
  - (b) The Permittee shall record pressure and scrubbing liquid (water) flow rate readings from the packed tower scrubber controlling HCl, at least once per day when the pickling line is in operation. The pressure drop across the packed tower scrubber shall be maintained within the range of 2.0 to 6.0 inches of water and the flow rate for scrubbing liquid shall be maintained with at least a minimum 60 gallons per minute. The concentration of HCl in the water shall be monitored once per day and when it reaches a concentration of 10 grams per liter the water will be discharged and new water added. When the pressure reading across the packed tower scrubber is outside the range of 2.0 to 6.0 inches of water, or if the flow rate for scrubbing liquid is less than 60 gallons per minute, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.

These monitoring conditions are necessary because the packed tower scrubber for the pickling line operation must operate properly to ensure compliance with 326 IAC 6-3-2 and 326 IAC 2-8 (FESOP).

## **Conclusion**

The operation of this steel pickling and slitting operation shall be subject to the conditions of the attached proposed renewal FESOP No. F127-22017-00040.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler**

**Company Name: Worthington Steel Company  
 Address City IN Zip: 100 Worthington Drive, Porter, Indiana 46304  
 Permit Number: 127-22017-00040  
 Plt ID: 127-00040  
 Reviewer: Janet Mobley  
 Date: 6/14/2006**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

19.9

174.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx 100.0 **see below	VOC	CO
Potential Emission in tons/yr	0.2	0.7	0.1	8.7	0.5	7.3

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**HAPs Emissions**

**Company Name: Worthington Steel Company**

**Address City IN Zip: 100 Worthington Drive, Porter, Indiana 46304**

**Permit Number: 127-22017-00040**

**Plt ID: 127-00040**

**Reviewer: Janet Mobley**

**Date: 6/14/2006**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.830E-04	1.046E-04	6.537E-03	1.569E-01	2.964E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.358E-05	9.588E-05	1.220E-04	3.312E-05	1.830E-04

Methodology is the same as page 1.

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



**Appendix A: Emissions Calculations****Natural Gas Combustion Only****MM BTU/HR <100****Insignificant natural gas fired heaters****HAPs Emissions****Company Name: Worthington Steel Company****Address City IN Zip: 100 Worthington Drive, Porter, Indiana 46304****CP: 127-22017-00040****Pit ID: 127-00040****Reviewer: Janet Mobley****Date: 14-Jun-06****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.311E-04	1.892E-04	1.183E-02	2.838E-01	5.361E-04

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.884E-05	1.734E-04	2.208E-04	5.992E-05	3.311E-04

Methodology is the same as page 1.

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

## Appendix A: Emission Calculations Summary

**Company Name:** Worthington Steel Company  
**Address City IN Zip:** 100 Worthington Drive, Porter, Indiana 46304  
**FESOP:** 127-22017-00040  
**Pit ID:** 127-00040  
**Reviewer:** Janet Mobley  
**Da 14-Jun-06**

Uncontrolled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Natural Gas boiler	Insignificant Natural Gas Combustion	Scale Breaker and Pickling Line <sup>(1)</sup>	Fugitive Emissions	Storage Tanks	TOTAL
PM	0.20	0.30	171.44	0.00	0.00	171.94
PM10	0.70	1.20	171.44	0.00	0.00	173.34
SO2	0.10	0.10	0.00	0.00	0.00	0.20
NOx	8.70	15.80	0.00	0.00	0.00	24.50
VOC	0.50	0.90	0.00	11.29	0.00	12.69
CO	7.30	13.20	0.00	0.00	0.00	20.50
total HAPs	0.16	0.30	357.50	1.24	0.45	359.20
worst case single HAP	(Hexane) 0.157	(Hexane) 0.28	(HCl) 357.5 <sup>(2)</sup>	(HCl) 1.24	(HCl) 0.45	(HCl) 357.5 <sup>(2)</sup>

Total emissions based on rated capacity at 8,760 hours/year, before controls.

Controlled Potential Emissions <sup>(3)</sup> (tons/year)						
Emissions Generating Activity						
Pollutant	Natural Gas boiler	Insignificant Natural Gas Combustion	Scale Breaker and Pickling Line <sup>(1)</sup>	Fugitive Emissions	Storage Tanks	TOTAL
PM	0.20	0.30	24.00	0.00	0.00	24.50
PM10	0.70	1.20	24.00	0.00	0.00	25.90
SO2	0.10	0.10	0.00	0.00	0.00	0.20
NOx	8.70	15.80	0.00	0.00	0.00	24.50
VOC	0.50	0.90	0.00	11.29	0.00	12.69
CO	7.30	13.20	0.00	0.00	0.00	20.50
total HAPs	0.16	0.30	7.12	1.24	0.45	9.27
worst case single HAP	(Hexane) 0.157	(Hexane) 0.28	(HCl) 7.12 <sup>(2)</sup>	(HCl) 1.24	(HCl) 0.45	(HCl) 7.12 <sup>(2)</sup>

Total emissions based on rated capacity at 8,760 hours/year, after control.

Notes:

- (1) Emissions from the Scale breaker and pickling line are obtained from the original FESOP permit (127-5229-00040)
- (2) HCl emissions are from pickling line only
- (3) Controlled emissions from the scale breaker and pickling line are based on the limits that source is willing to take in order to comply with 326 IAC 2-8-4 (FESOP)