



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: March 31, 2006  
RE: Magnetics International, Inc / 127-22051-00039  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

**Notice of Decision: Approval – Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

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

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

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

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



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

---

*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
[www.IN.gov/idem](http://www.IN.gov/idem)

Mr. Franz Mullings  
Magnetics International, Inc.  
1111 North State Road 149  
Burns Harbor, IN 46304

March 31, 2006

Re: 127-22051-00039  
Significant Permit Modification to  
Part 70 No.: T 127-7555-00039

Dear Mr. Mullings:

Magnetics International, Inc. was issued a permit on February 15, 2005 for an iron oxide and hydrochloric acid production facility. A letter requesting changes to this permit was received on November 10, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of revising the compliance determination and monitoring requirements

All other conditions of the permit shall remain unchanged and in effect. For your convenience the entire Part 70 Operating Permit as modified will be provided at issuance.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Jenny Acker, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Jenny Acker or extension (2-8253), or dial (317) 232-8253.

Sincerely,  
Original signed by Nisha Sizemore for

Paul Dubenetzky  
Assistant Commissioner  
Office of Air Quality

JLA

cc: File – Porter County  
U.S. EPA, Region V  
Porter County Health Department  
Norwest Regional Office  
Air Compliance Section Inspector – Michael Hall  
Compliance Data Section  
Administrative and Development



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Magnetics International, Inc.  
1111 North State Road 149  
Burns Harbor, 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 provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

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

Operation Permit No.: T127-7555-00039	
Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 15, 2005  Expiration Date: February 15, 2010

Significant Permit Modification No.: 127-22051-00039	
Original signed by Nisha Sizemore for: Paul Dubenetzky Assistant Commissioner Office of Air Quality	Issuance Date: March 31, 2006  Expiration Date: February 15, 2010

## TABLE OF CONTENTS

### A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

### B GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]
- B.3 Enforceability [326 IAC 2-7-7]
- B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
- B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
- B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3)and (13)] [326 IAC 2-7-6(1)and(6)]  
[326 IAC 1-6-3]
- B.11 Emergency Provisions [326 IAC 2-7-16]
- B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
- B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]
- B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
- B.16 Permit Renewal [326 IAC 2-7-4]
- B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]
- B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
- B.20 Source Modification Requirement [326 IAC 2-7-10.5]
- B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]
- B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
- B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]
- B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

### C SOURCE OPERATION CONDITIONS

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

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than  
One Hundred (100) pounds per hour [326 IAC 6-3-2]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Stack Height [326 IAC 1-7]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

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

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

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

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

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

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

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

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

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

**Stratospheric Ozone Protection**

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

**D.1 FACILITY OPERATION CONDITIONS – Acid Regeneration Facility**

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

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

D.1.2 National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCl  
Process Facilities and Hydrochloric Acid Regeneration Plants [40 CFR 63,  
Subpart CCC][40 CFR 63.1157]

D.1.3 NESHAP Operational and Equipment Standards [40 CFR 63.1159, Subpart CCC]

D.1.4 NESHAP Maintenance Requirements [40 CFR 63.1160, Subpart CCC]

D.1.5 Particulate Matter (PM) and Hydrochloric Acid (HCl) [326 IAC 2-1.1-2]

D.1.6 Particulate Matter (PM) [326 IAC 6-3-2]

D.1.7 Visible Emission Limits

D.1.8 Compliance and Enforcement [326 IAC 2-7-6(3)][326 IAC 2-7-15]

D.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

D.1.10 Testing Requirements [40 CFR 63.1161, Subpart CCC]

D.1.11 Particulate and HCl Control [326 IAC 2-7-6(6)]

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

D.1.12 Monitoring Requirements [40 CFR 63.1162]

D.1.13 Visible Emissions Notations [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.1.14 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.1.15 Broken or Failed Bag Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.1.16 Scrubber Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.1.17 Failure Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

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

D.1.18 Record Keeping Requirements

D.1.19 Reporting Requirements [40 CFR 63.1164]

**Certification**  
**Emergency Occurrence Report**  
**Quarterly Deviation and Compliance Monitoring Report**

## 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, A.2, and A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

---

The Permittee owns and operates an iron oxide and hydrochloric acid production facility.

Responsible Official:	Mike Sieckmann, Vice President
Source Address:	1111 North State Road 149, Burns Harbor, IN 46304
Mailing Address:	1111 North State Road 149, Burns Harbor, IN 46304
General Source Phone Number:	(219) 763-1199
SIC Code:	2819
County Location:	Porter
Source Location Status:	Nonattainment for 1-hour ozone and 8-hour ozone standards Nonattainment for PM2.5 Unclassifiable for PM10 and SO2 Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Minor Source under Emission Offset Major Source, Section 112 of the Clean Air Act

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

---

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

- (a) Two (2) Process Lines, installed in 1990 consisting of:
  - (1) Roaster A-an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-1, utilizing tangential firing and four (4) low-NO<sub>x</sub> burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; particulate emissions are controlled by one (1) venturi separator; and HCl emissions are controlled by one (1) absorber and two (2) scrubbers in series. This system exhausts through the stack identified as S-1.
  - (2) Roaster B- an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-1, utilizing tangential firing and four (4) low-NO<sub>x</sub> burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; particulate emissions are controlled by one (1) venturi separator; and HCl emissions are controlled by one (1) absorber and two (2) scrubbers in series. This system exhausts through the stack identified as S-2.
- (b) Two (2) iron oxide storage bins, identified as Bin A and Bin B, each with a storage capacity of 100 tons. Each bin is equipped with a baghouse to capture dust and exhaust through stacks 4 and 5 respectively.

- (c) One (1) tank farm identified as T-6, consisting of sixteen (16) storage tanks. Tanks No. 1-12 each have a capacity of 30,000 gallons and are used to store either ferrous chloride waste or hydrochloric acid. Tanks No. 13-16 each have a capacity of 33,000 gallons and are used to store either ferrous chloride waste or hydrochloric acid. Each of these tanks are attached to a common vent header and fume scrubber to control vapor loss and exhausts through stack, identified as S-3.
- (d) One (1) loading and unloading station with emissions controlled by fume scrubber exhausting through stack, S-3
- (e) One (1) Enrichment Facility consisting of one (1) 4 MMBtu/hr natural gas boiler exhausting through stack EP001 and one (1) processing tank with emissions controlled by an acid fume scrubber and exhausts through stack EP002.

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

---

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

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

---

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

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

## SECTION B

## GENERAL CONDITIONS

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

---

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

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

---

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

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

---

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

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

---

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

---

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

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

---

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

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

---

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

---

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

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

---

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

---

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

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northwest Regional Office Telephone Number: 219-757-0265

Northwest Regional Office Facsimile Number: 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 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) 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 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this

permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

---

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

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

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

---

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

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

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

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4.

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

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

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

---

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

---

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
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 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification, which shall be submitted, is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade 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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

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

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

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

---

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

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

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

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

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

---

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

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

---

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

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

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

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

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

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

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

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

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

before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

---

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

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

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

---

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

---

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

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

---

- (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 2-7-5] [326 IAC 2-7-6]**

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

---

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
within ninety (90) days after the date of issuance of this permit.  
  
The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

---

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

**C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

---

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

---

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

The response action documents submitted pursuant to this condition do require the

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

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

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

(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

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

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

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

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

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

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

Indiana Department of Environmental Management

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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

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

---

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

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

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (a) Two (2) Process Lines, installed in 1990 consisting of:
- (1) Roaster A-an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-1, utilizing tangential firing and four (4) low-NO<sub>x</sub> burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; particulate emissions are controlled by one (1) venturi separator; and HCl emissions are controlled by one (1) absorber and two (2) scrubbers in series. This system exhausts through the stack identified as S-1.
  - (2) Roaster B- an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-1, utilizing tangential firing and four (4) low-NO<sub>x</sub> burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; particulate emissions are controlled by one (1) venturi separator; and HCl emissions are controlled by one (1) absorber and two (2) scrubbers in series. This system exhausts through the stack identified as S-2.
- (b) Two (2) iron oxide storage bins, identified as Bin A and Bin B, each with a storage capacity of 100 tons. Each bin is equipped with a baghouse to capture dust and exhaust through stacks 4 and 5 respectively.
- (c) One (1) tank farm identified as T-6, consisting of sixteen (16) storage tanks. Tanks No. 1-12 each have a capacity of 30,000 gallons and are used to store either ferrous chloride waste or hydrochloric acid. Tanks No. 13-16 each have a capacity of 33,000 gallons and are used to store either ferrous chloride waste or hydrochloric acid. Each of these tanks are attached to a common vent header and fume scrubber to control vapor loss and exhausts through stack, identified as S-3.
- (d) One (1) loading and unloading station with emissions controlled by fume scrubber exhausting through stack, S-3
- (e) One (1) Enrichment Facility consisting of one (1) 4 MMBtu/hr natural gas boiler exhausting through stack EP001 and one (1) processing tank with emissions controlled by an acid fume scrubber and exhausts through stack EP002.

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

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

#### D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

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

#### D.1.2 National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants [40 CFR 63, Subpart CCC] [40 CFR 63.1157]

Pursuant to 40 CFR 63.1157(b), Subpart CCC, the hydrochloric acid regeneration plant shall comply with the following requirements:

The Permittee shall not cause or allow to be discharged into the atmosphere from the affected

hydrochloric acid regeneration plant:

- (a) Any gases that contain HCl in a concentration in excess of 25 ppmv
- (b) Any gases that contain chlorine (Cl<sub>2</sub>) in a concentration in excess of either 6 ppmv or an alternative source-specific maximum concentration. The source-specific maximum concentration standard shall be established according to 40 CFR 63.1161(c)(2).

D.1.3 NESHAP Operational and Equipment Standards [40 CFR 63.1159, Subpart CCC]

Pursuant to 40 CFR 63.1159, Subpart CCC:

- (a) Hydrochloric acid regeneration plant. The Permittee of an affected plant must operate the affected plant at all times while in production mode in a manner that minimizes the proportion of excess air fed to the process and maximizes the process offgas temperature consistent with producing usable regenerated acid or iron oxide.
- (b) Hydrochloric acid storage vessels. The Permittee of an affected vessel shall provide and operate, except during loading and unloading of acid, a closed-vent system for each vessel. Loading and unloading shall be conducted either through enclosed lines or each point where the acid is exposed to the atmosphere shall be equipped with a local fume capture system, ventilated through an air pollution control device.

D.1.4 NESHAP Maintenance Requirements [40 CFR 63.1160, Subpart CCC]

The Permittee shall comply with the operation and maintenance requirements of 40 CFR 63.6(e) (Subpart A, General Provisions). Pursuant to 40 CFR 63.1160, Subpart CCC, the Permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The Permittee shall submit an application for permit modification to incorporate the plan by reference into the Part 70 Permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

- (a) Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
- (b) Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
- (c) Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling;
- (d) Require an inspection of each scrubber at intervals of no less than 3 months with:
  - (1) Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
  - (2) Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
  - (3) Repair or replacement of droplet eliminator elements as needed;
  - (4) Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
  - (5) Adjustment of damper settings for consistency with the required air flow.

- (e) If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Administrator may be used.
- (f) The Permittee shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement.
- (g) The Permittee shall maintain a record of each inspection, including each item identified in (d) above, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

#### D.1.5 Particulate Matter (PM) and Hydrochloric Acid (HCl) [326 IAC 2-1.1-2]

---

Pursuant to construction permit PC (64) 1864, issued on July 2, 1990, the magnetic powder production facility shall be limited to the following:

- (a) each roaster shall be fired by natural gas fired burners rated at 30 MMBtu/hr heat input.
- (b) each roaster exhaust stack shall be limited to less than 3.09 lbs/hr of PM emissions.
- (c) combined processing capacity of waste pickle through both process trains shall not exceed 39,945,600 gallons per year. (This number is based on the plant design capacity of 76 gpm with a 24% iron chloride content).
- (d) each iron oxide storage bin shall be limited to 0.07 lb/hr of PM emissions

#### D.1.6 Particulate Matter (PM) [326 IAC 6-3-2]

---

Pursuant to 326 IAC 6-3-2 the particulate matter (PM) from the magnetic powder production facility shall be limited by the following:

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

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

- (a) At a process weight rate of 12 tons per hour for Roaster A Process Line, the allowable PM emission rate shall not exceed 21.7 lb/hr.
- (b) At a process weight rate of 12 tons per hour for Roaster B Process Line the allowable PM emission rate shall not exceed 21.7 lb/hr.
- (c) At a process weight rate of 1.8 tons per hour for each storage bin, the allowable PM emission rate shall not exceed 6.03 lb/hr.
- (d) At a process weight rate of 4.54 tons per hour for the Enrichment Facility, the allowable PM emission rate shall not exceed 11.3 lb/hr.

#### D.1.7 Visible Emission Limits

---

Pursuant to construction permit PC (64) 1864, issued on July 2, 1990, visible emissions from any stack, other process exhaust, building roof monitor, building opening or material handling operation due to the operation of the magnetic powder production facility shall not exceed five percent (5%) opacity, as determined by 40 CFR 60 appendix A, Method 9 and 326 IAC 5-1.

**D.1.8 Compliance and Enforcement [326 IAC 2-7-6(3)][326 IAC 2-7-15]**

---

- (a) Pursuant to 40 CFR 63.1157(b)(1), the Permittee shall not cause or allow to be discharged in the atmosphere from the affected hydrochloric acid regeneration plant, any gases that contain HCl in a concentration in excess of 25 ppmv. The IDEM has information that indicates that the Permittee is not in compliance with this applicable requirement.
- (b) Pursuant to 40 CFR 63.1157(b)(2), the Permittee shall not cause or allow to be discharged in the atmosphere from the affected hydrochloric acid regeneration plant, any gases that contain chlorine in a concentration in excess of 6 ppmv. The IDEM has information that indicates that the Permittee is not in compliance with this applicable requirement.

The IDEM OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 40 CFR 63.1157(b)(1) and 40 CFR 63.1157(b)(2) and a schedule for achieving compliance with such requirements.

**D.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

---

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

**Compliance Determination Requirements**

**D.1.10 Testing Requirements [40 CFR 63.1161, Subpart CCC]**

---

- (a) Within twelve (12) months of the latest performance test, the Permittee shall conduct a performance test for each affected process or control device to determine and demonstrate compliance with the applicable emission limitation according to the requirements of 40 CFR Part 63.7 (Subpart A, General Provisions). Pursuant to 40 CFR Part 63.1161, Subpart CCC, this performance test shall meet the following minimum requirements:
  - (1) Following approval of the site-specific test plan, the Permittee shall conduct a performance test to measure the concentration of HCl and Cl<sub>2</sub> for hydrochloric acid regeneration plants in gases exiting the process or the emission control device to determine compliance with the applicable emission concentration standards.
  - (2) Compliance with the applicable concentration standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.
  - (3) Compliance is achieved if the average measured concentration of HCl and Cl<sub>2</sub> exiting the process or the emission control device is less than or equal to the applicable emission concentration standard.
- (b) Establishment of hydrochloric acid regeneration plant operating parameters.
  - (1) During the performance test for hydrochloric acid regeneration plants, the owner or operator shall establish site-specific operating parameter values for the minimum process offgas temperature and the maximum proportion of excess air fed to the process as described in 40 CFR 63.1162(b)(1). During the emission test, each operating parameter must be monitored and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes for parameters that are monitored continuously. Amount of iron in the spent pickle liquor shall be determined for

each run by sampling the liquor every 15 minutes and analyzing a composite of the samples. The owner or operator shall determine the compliant monitoring values as the averages of the values recorded during any of the runs for which results are used to establish the emission concentration 40 CFR 63.1161(a)(2). An owner or operator may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, an owner or operator may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

- (2) During this performance test, the owner or operator of an existing affected plant may establish an alternative concentration standard if the owner or operator can demonstrate to the Administrator's satisfaction that the plant cannot meet a concentration limitation for Cl<sub>2</sub> of 6 ppmv when operated within its design parameters. The alternative concentration standard shall be established through performance testing while the plant is operated at maximum design temperature and with the minimum proportion of excess air that allows production of iron oxide of acceptable quality while measuring the Cl<sub>2</sub> concentration in the process exhaust gas. The measured concentration shall be the concentration standard for that plant.
- (c) Performance tests shall be conducted annually or according to an alternative schedule approved by IDEM, OAQ. If any performance test shows that the HCl emission limitation is being exceeded, the Permittee is in violation of the emission limit.
- (d) Pursuant to 40 CFR 63.1163(d), the Permittee of an affected source shall notify IDEM, OAQ in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow IDEM, OAQ to review and approve the site-specific test plan required under 40 CFR 63.7(c), and, if requested by IDEM, OAQ, to have an observer present during the test.
- (e) The following test methods from Appendix A of 40 CFR 60 shall be used to determine compliance under 40 CFR 63.1157(b);
  - (1) Method 1, to determine the number and location of sampling points, with the exception that no sampling traverse point shall be within one inch of the stack or duct wall;
  - (2) Method 2, to determine gas velocity and volumetric flow rate;
  - (3) Method 3, to determine the molecular weight of the stack gas;
  - (4) Method 4, to determine the moisture content of the stack gas; and
  - (5) Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources B Isokinetic Method," to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (dscm) [30 dry standard cubic feet (dscf)]. The concentration of HCl shall be calculated for each run as follows:  $C_{HCl(ppmv)} = 0.659 C_{HCl(mg/dscm)}$ , where  $C_{(ppmv)}$  is concentration in ppmv and  $C_{(mg/dscm)}$  is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.
  - (6) The Permittee may use equivalent alternative measurement methods approved by U.S. EPA.

**D.1.11 Particulate and HCl Control [326 IAC 2-7-6(6)]**

---

- (a) In order to comply with D.1.2, D.1.3, D.1.5 and D.1.6, the scrubbers and baghouses shall be in operation at all times the iron oxide and hydrochloric acid regeneration and recovery plant is in operation.
- (b) Pursuant to Amendment 127-4871 issued on October 6, 1995, the vents from pickle liquor and HCl tanks and vents on tank trucks loaded at the facility shall be directed through a scrubber at all times when the facility is operating.
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

**D.1.12 Monitoring Requirements [40 CFR 63.1162]**

---

- (a) The Permittee of a new, reconstructed, or existing acid regeneration plant shall:
  - (1) Install, operate and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if required, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in 40 CFR 63.1160(b)(2).
  - (2) Failure to record each of the operating parameters in 40 CFR 63.1162(a)(2) is a violation of the monitoring requirements of 40 CFR 63, Subpart CCC.
  - (3) Each monitoring device shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.
  - (4) The Permittee may develop and implement alternative monitoring requirements subject to approval by the U.S. EPA.
- (b) The Permittee shall install, operate, and maintain systems for the measurement and recording of the:
  - (1) Process offgas temperature, which shall be monitored continuously and recorded at least once every shift while the facility is operating in production mode; and
  - (2) Parameters from which proportion of excess air is determined. Proportion of excess air shall be determined by a combination of total air flow rate, fuel flow rate, spent pickle liquor addition rate, and amount of iron in the spent pickle liquor, or by any other combination of parameters approved by the Administrator in accordance with 40 CFR 63.8(f) of subpart A of this part. Proportion of excess air shall be determined and recorded at least once every shift while the plant is operating in production mode.
  - (3) Each monitoring device must be certified by the manufacturer to be accurate to within 5 percent and must be calibrated in accordance with the manufacturer's

instructions but not less frequently than once per year.

- (4) Operation of the plant with the process offgas temperature lower than the value established during performance testing or with the proportion of excess air greater than the value established during performance testing is a violation of the operational standard specified in 40 CFR 63.1159(a) of this subpart.
- (c) Pursuant to 40 CFR 63.1162, the Permittee shall inspect each hydrochloric acid storage vessel semiannually to determine that the closed-vent system and either the air pollution control device or the enclosed loading and unloading line, whichever is applicable, are installed and operating when required.

D.1.13 Visible Emissions Notations [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

- (a) Visible emission notations of the exhausts from the iron oxide storage bins baghouses (4 and 5) and loading and unloading station shall be performed once per day during normal daylight operations. 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 emission are observed, the Permittee shall take reasonable steps in accordance with Section C - Response to Excursions or Exceedances. Observations of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit.

D.1.14 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

The Permittee shall record the pressure drop across the baghouses used in conjunction with the iron oxide storage bins, at least once per day when the iron oxide storage bins are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 to 10.0 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.

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

D.1.15 Broken or Failed Bag Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

- (a) For a single compartment cartridge collector or baghouse 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 cartridge collector or baghouse 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).

Baghouse or cartridge collector failure can be indicated by a significant drop in the baghouse's or cartridge collector'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.

D.1.16 Scrubber Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

The Permittee shall record the pressure drop of the scrubber used in conjunction with the Tank Farm, at least once per day when the storage tanks are in operation. When for any one reading, the pressure drop across the scrubber is outside the normal range of 15 to 30 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 drop 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.

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

D.1.17 Failure Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

In the event that a 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 C - Emergency Provisions).

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

D.1.18 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain the records pursuant to 40 CFR 63.1165:
- (1) The Permittee, as required by 40 CFR 63.10(b)(2) (Subpart A, General Provisions), shall maintain general records for 5 years from the date of each record of:
    - (A) The occurrence and duration of each startup, shutdown, or malfunction of operation;
    - (B) The occurrence and duration of each malfunction of the air pollution control equipment;
    - (C) All maintenance performed on the air pollution control equipment;
    - (D) Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
    - (E) All information necessary to demonstrate conformance with the startup shutdown, and malfunction plan when all actions taken during periods of

startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see 40 CFR 63.10(b)(2)(v))

- (F) All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests.
  - (G) All results of initial or subsequent performance tests;
  - (H) If the Permittee has been granted a waiver from record keeping or reporting requirements under 40 CFR 63.10(f), any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements;
  - (I) If the Permittee has been granted a waiver from the initial performance test under 40 CFR 63.7(h), a copy of the full request and approval;
  - (J) All documentation supporting initial notifications and notifications of compliance status required by 40 CFR 63.9; and
  - (K) Records of any applicability determination, including supporting analyses.
- (2) In addition to the general records required by 40 CFR 63.1165(a), the Permittee shall maintain records for 5 years from the date of each record of:
- (A) Scrubber makeup water flow rate and recirculation water flow rate if a wet scrubber is used;
  - (B) Calibration and manufacturer certification that monitoring devices are accurate to within 5 percent;
  - (C) Each maintenance inspection and repair, replacement, or other corrective action; and
  - (D) The Permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the U.S. EPA or IDEM, OAQ for the life of the affected source or until the source is no longer subject to these provisions. In addition, if the operation and maintenance plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the U.S. EPA or IDEM, OAQ for a period of 5 years after each revision to the plan.
- (b) General records and 40 CFR 63, Subpart CCC records, for the most recent 2 years of operation must be maintained on site for 2 years. Records for the 3 previous years may be maintained off site.
  - (c) To document compliance with Condition D.1.13, the Permittee shall maintain records of visible emission notations of the iron oxide storage bins baghouses stack exhaust and the unloading and loading station once per day.
  - (d) To document compliance with Condition D.1.14, the Permittee shall maintain records once

per day of the pressure drop across the iron oxide storage bins baghouses during normal operation when venting to the atmosphere.

- (e) To document compliance with Condition D.1.16, the Permittee shall maintain records once per day of the pressure drop of the tank farm scrubber during normal operation when venting to the atmosphere.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.19 Reporting Requirements [40 CFR 63.1164]

- (a) As required by 40 CFR 63.10(d)(2), the Permittee of an affected source shall report the results of any performance test as part of the notification of compliance status required in 40 CFR 63.1163.
- (b) The Permittee of an affected source who is required to submit progress reports under 40 CFR 63.6(i), shall submit such reports to the IDEM, OAQ by the dates specified in the written extension of compliance. The notifications 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) Pursuant to 40 CFR 63.6(e), the Permittee of an affected source shall operate and maintain each affected emission source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all time, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan.
  - (1) Pursuant to 40 CFR 63.6(e)(3), the Permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.
  - (2) Pursuant to 40 CFR 63.10(d)(5)(I) if actions taken by a Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the Permittee shall state such information in a semiannual report. The report, to be certified by the Permittee or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30<sup>th</sup> day following the end of each calendar half; and
  - (3) Any time an action taken by a Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the Permittee shall comply with all requirements of 40 CFR 63.10(d)(5)(ii).
- (d) Reports shall be submitted in accordance with Section C - General Reporting Requirements of this permit. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Magnetics International, Inc.  
Source Address: 1111 North State Road 149, Burns Harbor, Indiana 46304  
Mailing Address: 1111 North State Road 149, Burns Harbor, Indiana 46304  
Part 70 Permit No.: T127-7555-00039

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Magnetics International, Inc.  
Source Address: 1111 North State Road 149, Burns Harbor, Indiana 46304  
Mailing Address: 1111 North State Road 149, Burns Harbor, Indiana 46304  
Part 70 Permit No.: T127-7555-00039

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

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

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

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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <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**

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

Source Name: Magnetics International, Inc.  
Source Address: 1111 North State Road 149, Burns Harbor, Indiana 46304  
Mailing Address: 1111 North State Road 149, Burns Harbor, Indiana 46304  
Part 70 Permit No.: T127-7555-00039

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

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

#### Source Background and Description

Source Name:	Magnetics International, Inc.
Source Location:	1111 North State Road 149, Burns Harbor, Indiana 46304
County:	Porter
SIC Code:	2819
Operation Permit No.:	T127-7555-00039
Significant Permit Modification No.:	127-22051-00039
Permit Reviewer:	Jenny Acker

On February 2, 2006, the Office of Air Quality (OAQ) had a notice published in The Vidette Messenger in Valparaiso, Indiana, stating that Magnetics International, Inc. applied for a Significant Permit Modification to a Part 70 Operating Permit relating to revising the compliance determination and monitoring requirements. The notice also stated that OAQ proposed to issue a modified Part 70 Operating permit and provided information on how the public could review the proposed permit modification 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.

Upon further review, IDEM has decided to make the following changes to the permit (where language deleted is shown with ~~strikeout~~ and that added is shown in **bold**):

Condition D.1.13(a) inadvertently contained visible emission notations for the roasters. Daily visible emission notations are not required for the scrubber controlling the roaster as the scrubber is for control of hazardous air pollutants (HAPs) and for control of particulate emission. Conditions D.1.18(c) and D.1.13(a) have been modified as follows:

#### D.1.13 Visible Emissions Notations [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

- (a) Visible emission notations of the exhausts from the ~~Roaster A (1), Roaster B (2),~~ iron oxide storage bins baghouses (4 and 5) and loading and unloading station shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

#### D.1.18 Record Keeping Requirements

- (a) and (b) remain the same
- (c) To document compliance with Condition D.1.13, the Permittee shall maintain records of visible emission notations of the iron oxide storage bins baghouses stack exhaust **and the loading and unloading station** once per day.

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Significant Permit Modification.

#### Source Description and Location

Source Name:	Magnetics International, Inc.
Source Location:	1111 North State Road 149, Burns Harbor, Indiana 46304
County:	Porter
SIC Code:	2819
Operation Permit No.:	T127-7555-00039
Significant Permit Modification No.:	127-22051-00039
Permit Reviewer:	Jenny Acker

#### Existing Approvals

The source was issued a Part 70 Operating Permit (127-7555-00039) on February 15, 2005.

#### County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM10	unclassifiable
PM2.5	nonattainment
SO <sub>2</sub>	unclassifiable
NO <sub>2</sub>	attainment
1-hour Ozone	nonattainment
8-hour Ozone	nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
- (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 NOx 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.
  - (2) VOC and NOx 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 NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

- (b) U.S. EPA, in the 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 nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (c) Porter County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

#### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM <sub>10</sub>	2
SO <sub>2</sub>	0
VOC	1
CO	11
NO <sub>x</sub>	13
HAP (lead)	0

#### Background and Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Magnetics International, Inc., on November 10, 2005, requesting IDEM, OAQ, to re-evaluate the compliance determination and monitoring requirements.

#### Enforcement Issues

There are no pending enforcement actions related to this modification.

#### Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant,

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

There is not an increase in the potential to emit associated with this modification.

This modification to the Part 70 Operating Permit will be through a significant permit modification issued pursuant to 326 IAC 2-7-12 (d), because the modification requires significant changes in existing monitoring Part 70 permit terms and conditions, and requires relaxing recordkeeping permit terms and conditions.

#### **Federal Rule Applicability Determination**

There are no new federal rules applicable to the source due to this modification.

#### **State Rule Applicability Determination**

There are no new state rules applicable to the source due to this modification.

#### **Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance determination requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no new compliance determination and monitoring requirements applicable to the source due to this modification. Changes to the compliance determination and monitoring requirements are detailed in the Proposed Changes section of this document.

#### **Proposed Changes**

The changes listed below have been made to Part 70 Operating Permit No. 127-7555-00039. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

##### **Change No. 1:**

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of

proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows:

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

---

(a) remains the same

~~(b) The Permittee shall implement the PMPs, including any required record keeping, necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~

(e 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 does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

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

---

(a), (b), (b)(1) to (b)(4) remain the same

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015 **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 2-7-5(3)(C)(ii) and must contain the following:

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

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) and (d) remain the same

(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 2-7-4(c)(9) be revised in response to an emergency.

(f) through (h) remain the same

**Change No. 2:**

IDEM has clarified the Section B - Operational Flexibility condition as follows:

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana ~~46206-6015~~ **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, ~~on a rolling five (5) year basis~~, all such changes and emissions trading **trades** that are subject to 326 IAC 2-7-20(b), (c), or (e). ~~and makes~~ **The Permittee shall make** such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) remains the same

- (c) **Emission Trades [326 IAC 2-7-20(c)]**  
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ **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 2-7-20(c).

(d) remains the same

### Change No. 3:

IDEM realizes that these specifications can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.

#### C.4312 ~~Pressure Gauge and Other Instrument Specifications~~ [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

---

- (a) ~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed~~ **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 normal maximum reading for the normal range shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.**
- (b) ~~Whenever a condition in this permit requires the measurement of a (temperature or flow rate), the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.~~
- (c) ~~The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.~~
- (d b) The Permittee may request **that** the IDEM, OAQ approve the use of a pressure gauge or ~~other~~ **an** instrument that does not meet the above specifications provided the Permittee can demonstrate **that** an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of ~~pressure drop or other~~ the parameters.

### Change No. 4:

IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

#### C.1615 ~~Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** [326 IAC 2-7-5] [326 IAC 2-7-6]

---

- (a) ~~The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring~~

~~conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on-site, and comprised of:~~

- ~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~
- ~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.~~

~~\_\_\_\_\_ The OMM Plan (or Parametric Monitoring and SSM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirements.~~

~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

- ~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan); or~~
- ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
- ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~

~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~

- ~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
- ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such~~

~~request has not been denied.~~

~~(3) An automatic measurement was taken when the process was not operating.~~

~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~

~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~

~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

**(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.

**Change No. 5:**

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections pursuant to 326 IAC 2-7-5 and 6 have been removed from the permit. In addition, the requirement to keep records of the inspections have been removed. The following conditions have been removed from the permit:

---

~~D.1.15 Baghouse Inspections [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]~~

~~An inspection shall be performed each calendar quarter of all bags controlling the iron oxide storage bins, when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

---

~~D.1.19 18 Scrubber Inspections [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]~~

~~An inspection shall be performed each calendar quarter of the Tank Farm scrubber. Inspections required by this condition shall not be performed in consecutive months.~~

---

~~D.1.20 19 Record Keeping Requirements~~

~~(f) To document compliance with Condition D.1.15 and D.1.1918, the Permittee shall maintain records of the results of the inspections required under Condition D.1.15 and D.1.1918.~~

**Change No. 6:**

Upon further review, IDEM has determined that once per day monitoring of the visible emission notations is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6. Therefore, the conditions in the D sections requiring once per shift monitoring and recordkeeping of visible emission notation pursuant to 326 IAC 2-7-5 and 6 have been changed to once per day monitoring and recordkeeping of visible emission notations as follows:

---

D.1.13 Visible Emissions Notations [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

- (a) Visible emission notations of the exhausts from the Roaster A (1), Roaster B (2), iron oxide storage bins baghouses (4 and 5) and loading and unloading station shall be performed once per **shift day** during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) through (d) remain the same
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emission is are observed, the Permittee shall take reasonable steps in accordance with Section C - Response to Excursions or Exceedances.** ~~Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit. **Observations of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this**

**permit.**

**D.1.20 19** Record Keeping Requirements

---

- (c) To document compliance with Condition D.1.13, the Permittee shall maintain records of visible emission notations of the iron oxide storage bins baghouses stack exhaust once per ~~shift~~ **day**.

**Change No.7:**

Upon further review, IDEM has determined that once per day monitoring of the control device is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6. Therefore the conditions in the D sections requiring once per shift monitoring and recordkeeping the control device pursuant to 326 IAC 2-7-5 and 6 have been changed to once per day monitoring and recordkeeping the control device as follows:

**D.1.14** Baghouse Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

---

The Permittee shall record the ~~total static~~ pressure drop across the baghouses used in conjunction with the iron oxide storage bins, at least once per ~~shift~~ **day** when the iron oxide storage bins are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 to 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **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 - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.

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

**D. D.1.47 16** Scrubber Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

---

The Permittee shall record the ~~total static~~ pressure drop of the scrubber used in conjunction with the Tank Farm, at least once per ~~shift~~ **day** when the storage tanks is in operation. When for any one reading, the pressure drop across the scrubber is outside the normal range of 15 to 30 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**. A pressure drop reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** shall be considered a ~~violation of~~ **deviation from** this permit.

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

**D.1.20 19** Record Keeping Requirements

---

- (d) To document compliance with Condition D.1.14, the Permittee shall maintain records once per ~~shift~~ **day** of the ~~total static~~ pressure drop across the iron oxide storage bins baghouses during normal operation when venting to the atmosphere.
- (e) To document compliance with Condition D.1.~~47~~**16**, the Permittee shall maintain records

once per ~~shift~~ **day** of the ~~total static~~ pressure drop of tank farm scrubber during normal operation when venting to the atmosphere.

**Change No. 8:**

Paragraph (a) of the Broken or Failed Baghouse and Cartridge Collector conditions has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to the Conditions listed as Particulate Control in the Compliance Determination Section requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

A new Paragraph has been added to the Broken or Failed Baghouse or Cartridge Collector condition for those processes that operate in batch mode. IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable

D.1.11 Particulate and HCl Control [326 IAC 2-7-6(6)]

(a) and (b) remain the same

- (c) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

D.1.16 15 Broken or Failed Bag Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

~~In the event that cartridge collector or baghouse failure has been observed:~~

- ~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after the bag failure is observed and it will be 10 days or more after the failure is observed before the failed units can be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

- (b a) For a single compartment cartridge collectors or baghouses **controlling emissions from a process operated continuously**, if failure is indicated by a significant drop in the cartridge collector's or baghouses pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if cartridge or baghouse failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks,

~~dust traces or triboflows, then~~ a failed units and the associated process ~~will~~ **shall** be shut down immediately until the failed units ~~have~~ **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 cartridge collector or baghouse 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).**

**Baghouse or cartridge collector failure can be indicated by a significant drop in the baghouse's or cartridge collector'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.**

**Change No. 9:**

The modified conditions D.1.8(a) , D.2.11(a), D.3.10(a), and D.4.11(a) are the same as Condition C.6 Operation of Equipment. Therefore, Condition C.6 - Operation of Equipment has been deleted.

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

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

**Change No. 10:**

The mailing address of IDEM, Office of Air Quality (OAQ) has changed. All references in the permit to "100 North Senate Ave, Post Office Box 6015, Indianapolis, Indiana 46206-6015" have been changed to "100 North Senate Ave, Indianapolis, Indiana 46204-2251".

**Change No. 11:**

U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Porter County as nonattainment for PM2.5. The Source Location Status in Condition A.1 has been revised as follows:

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

The Permittee owns and operates an iron oxide and hydrochloric acid production facility.

Responsible Official:	Mike Sieckmann, Vice President
Source Address:	1111 North State Road 149, Burns Harbor, IN 46304
Mailing Address:	1111 North State Road 149, Burns Harbor, IN 46304
General Source Phone Number:	(219) 763-1199
SIC Code:	2819
County Location:	Porter
Source Location Status:	Nonattainment for 1-hour ozone and 8-hour ozone standards <b>Nonattainment for PM2.5</b>



<b>Conclusion and Recommendation</b>
--------------------------------------

The staff recommends to the Commissioner that this Part 70 Significant Permit Modification (127-22051-00039) be approved.