



Thomas M. McDermott, Jr.
Mayor

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

CITY OF HAMMOND

RONALD L. NOVAK
Director

December 7, 2006

Certified Mail # 9057 8652

Ms. Jean Ziga
Environmental Coordinator
Hammond Group, Inc. (HGI)
1414 Field Street – P.O. Box 6408
Bldg. B
Hammond, Indiana 46325-6408

Re: **089-23378-00218**
First Minor Permit Revision to
FESOP 089-14167-00218

Dear Ms. Ziga:

Halstab Division of Hammond Group, Inc. (Halstab) was issued a FESOP Renewal on June 16, 2005 for an Industrial Inorganic and Organic Chemicals Manufacturing Plant. An application requesting changes to this permit was received on May 31, 2006. Pursuant to the provisions of 326 IAC 2-8-11.1(e) a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of a replacement of the Dryer No. 4 System, Stack S-22, with the Dryer No. 5 System in order to accommodate a new product. The required limitations and compliance conditions have also been added.

In addition, the conditions requiring control device inspections and the requirement to keep records of the inspections have been removed from each applicable D Section in the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this revision and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act – IC 4-21.5-3-5. Also enclosed is the receipt (#1863) in the amount of \$500.00 for the minor permit revision. If you have any questions on this matter, please contact Debra Malone, HDEM at (219) 853-6306.

Sincerely,

Ronald L. Novak, Director
Hammond Department of Environmental Management
Air Pollution Control Division

Enclosures

DM

cc: IDEM-OAQ, Mindy Hahn, Permits Administration



Thomas M. McDermott, Jr.
Mayor

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

CITY OF HAMMOND

RONALD L. NOVAK
Director

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) Renewal**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-**

**Halstab Division of Hammond Group, Inc.
3100 Michigan Street
Hammond, Indiana 46323**

(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 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F089-14167-00218	
Issued by: Original Signed by: Ronald L. Novak, Director Hammond Department of Environmental Management	Issuance Date: <u>June 16, 2005</u> Expiration Date: <u>June 16, 2010</u>

First Administrative Permit Amendment 089-22698, issued on 3/15/06.

First Minor Permit Revision: MPR089-23378-00218	Pages Affected: 3-11, 13-15, 40-41, 44-45, 47-48, 51-52, 55-56, 60-61, 63-64, 68-74, 76-77, 80-81, 83-84, and 86-87.
Issued by: Original Signed by: Ronald L. Novak, Director Hammond Department of Environmental Management	Amendment Issuance Date: <u>December 7, 2006</u> Expiration Date: <u>June 16, 2010</u>

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- D.10.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6.8] [326 IAC 2-8-4]
- D.10.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]
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Compliance Determination Requirements

- D.10.5 Particulate Matter less than 10 microns in diameter (PM10)
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- D.11.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC
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- D.11.3 Lead (Pb) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]
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Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.12.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1]
[326 IAC 2-8-4]
- D.12.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
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- D.12.4 Particulate Matter less than 10 microns in diameter (PM10)
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Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.12.6 Visible Emissions Notations
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- D.12.8 Broken or Failed Bag Detection

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D.13.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]

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

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[326 IAC 2-8-4]

D.14.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]

D.14.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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D.14.8 Broken or Failed Bag Detection

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SECTION D.15 FACILITY OPERATION CONDITIONS – TRIVIAL ACTIVITY

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[326 IAC 2-8-4]

D.15.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]

D.15.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.15.4 Particulate Matter less than 10 microns in diameter (PM10)
- D.15.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- D.15.7 Parametric Monitoring
- D.15.8 Broken or Failed Bag Detection

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- D.16.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
- D.16.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.16.4 Particulate Matter less than 10 microns in diameter (PM10)
- D.16.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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

- D.16.6 Visible Emissions Notations
- D.16.7 Parametric Monitoring
- D.16.8 Broken or Failed Bag Detection

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

- D.16.9 Record Keeping Requirements

SECTION D.17 FACILITY OPERATION CONDITIONS – TRIVIAL ACTIVITY

Stack ID S-20: Central Vacuum System/No. 1 Dryer Vacuum System

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

- D.17.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6.8] [326 IAC 2-8-4]
- D.17.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]
- D.17.3 Lead (Pb) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]
- D.17.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.17.5 Visible Emissions Notations

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- D.17.6 Record Keeping Requirements

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SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary Industrial Inorganic and Organic Chemicals Manufacturing Plant.

Authorized Individual:	Environmental Manager or Environmental Coordinator
Source Address:	3100 Michigan Street, Hammond, Indiana 46323
Mailing Address:	1414 Field Street, P.O. Box 6408 Hammond, Indiana 46325-6408
General Source Phone:	(219) 931-9360
SIC Code:	2819 – Industrial Inorganic Chemicals, nec 2869 – Industrial Organic Chemicals, nec
Source Location Status:	Lake County Attainment/Unclassifiable for PM10, SO ₂ , CO, NO ₂ and Lead, Nonattainment for PM2.5 and 8-hour ozone,
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source under PSD and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

Note: Bin vent filters and bag filters located at Halstab are the same as or equivalent to baghouses. All of the baghouses are the reverse jet air pulse type and contain filter bags supported by wire cages.

(a) Stack ID S-6: Mill Line No. 1

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper.

Emissions units associated with Stack ID S-6 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 209) followed by a HEPA filter.

(b) Stack ID S-7: Mill Line No. 2

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-7 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 236) followed by a HEPA filter.

(c) Stack ID S-8: Mill Line No. 3

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-8 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 247) followed by a HEPA filter.

(d) Stack ID S-12: Material Dump Station

Bags of material are dumped into a bulk / bagged material dump station.

Emissions units associated with Stack ID S-12 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 506) followed by a HEPA filter.

(e) Stack ID S-14: Blend Scale Hopper

Material is conveyed from the material handling system and product handling systems to a surge hopper, weighed through a Blend Scale Hopper, and then fed into a blender or to a Bulk/Bag Packaging System.

Emissions units associated with Stack ID S-14 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 455) followed by a HEPA filter.

(f) Stack ID S-15: Blender

Material from the Blend Scale Hopper is fed to a Blend Product Hopper, blended, and then sent to a Blended Product Storage Hopper.

Emissions units associated with Stack ID S-15 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 301) followed by a HEPA unit.

(g) Stack ID S-17: Bulk/Bag Packaging System, Mixed Metals System, and Two (2) Portable Packing Stations

Unit ID: S-17-1: Bulk/Bag Packaging System

Product is loaded into either bulk containers or consumable bags for shipment.

Emissions units associated with Stack ID S-17 were installed in November, 1981.

Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

Unit ID: S-17-2: Mixed Metals System

Products are fed into a dump station and transferred to a blender. The blender discharges to a pneumatic conveying line which transfers the blended product to a surge hopper which feeds the bulk/bag packaging stations. The surge hopper can also receive product directly from the Blended Product Handling System for packaging.

Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

Unit ID: S-17-3: Two (2) Portable Packing Stations

Products from a portable tote bin are packaged in bags for shipment.

Emissions from each station are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

(h) Stack ID S-22: Dryer No. 5

Reacted compound paste is conveyed (wet) into a drying screw. Hot air from combustion of natural gas is passed around the slurry, evaporating the water in the paste. The product is then milled and packed out in bags.

Emissions units associated with Stack ID S-22 were installed in 2006.

Emissions from this system are controlled by a bag filter followed by a HEPA unit.

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

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

(a) Stack ID S-3: Acid Dispersion System

Acid is poured into a dispersion tank where water is added.

Emissions units associated with Stack ID S-3 were installed in November, 1981.

There are no emission controls on this unit.

(b) Stack ID S-4: No. 1 Dryer

Reacted compound is conveyed to the dryer to evaporate off water.

Emissions units associated with Stack ID S-4 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 204) followed by a HEPA filter.

(c) Stack ID S-5: Dryer No. 1 Containment System

This stack services the Dryer No. 1 containment system and rework unloading station. The containment system encloses the No. 1 Dryer and captures fugitive emissions in order to reduce employee exposure. The rework unloading station is used to feed rework material to the dryer discharge.

Emissions units associated with Stack ID S-5 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 226) followed by a HEPA filter.

(d) Stack ID S-18: Boiler No. 1

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

(e) Stack ID S-19: Boiler No. 2

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

(f) Stack ID S-21: Dryer No. 3

Reacted compound is conveyed into a drying chamber to evaporate off water. The dried product is separated from the air stream in a product recovery baghouse.

Emissions units associated with Stack ID S-21 were installed in October, 1996.

Emissions from this system are controlled by a product recovery baghouse (No. 805) and a HEPA filter.

- (g) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (h) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (i) Combustion source flame safety purging on startup.
- (j) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (k) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (l) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (m) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (n) Cleaners and solvents characterized as follows:
- (1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 °F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 °C (68 °F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (o) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (p) Closed loop heating and cooling systems.
- (q) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 % by volume.
- (r) Any operation using aqueous solutions containing less than 1 % by weight of VOCs excluding HAPs.
- (s) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (t) Replacement or repair of bags or baghouses and filters in other air filtration equipment.

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- (u) Heat exchanger cleaning and repair.
 - (v) Process vessel degassing and cleaning to prepare for internal repairs.
 - (w) Paved and unpaved roads and packing lots with public access. [326 IAC 6-4]
 - (x) Conveyors as follows:
 - 1) Underground conveyors.
 - (y) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
 - (z) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
 - (aa) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.
 - (bb) On-site fire and emergency response training approved by the department.
 - (cc) Purge double block and bleed valves.
 - (dd) Filter or coalescer media changeout.
 - (ee) A laboratory as defined in 326 IAC 2-7-1(21)(D).
 - (ff) Research and development activities as defined in 326 IAC 2-7-1(21)(E).

Trivial Activities

The source also consists of the following trivial activities, as defined in 326 IAC 2-7-1(40):

- (a) Stack ID S-1: Feedstock Handling System

Feedstock is pneumatically conveyed from bulk delivery trucks to a storage hopper, a weigh hopper and finally fed to a dispersion system.

Emissions units associated with Stack ID S-1 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 121) followed by a HEPA filter.
- (b) Stack ID S-2: Dispersion System

Feedstock is fed to a dispersion tank where it is mixed with water and acid and then fed to a reactor.

Emissions units associated with Stack ID S-2 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 115) followed by a HEPA filter.

(c) Stack ID S-9: Product Handling System No. 1

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-9 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 317) followed by a HEPA filter.

(d) Stack ID S-10: Product Handling System No. 2

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-10 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 318) followed by a HEPA filter.

(e) Stack ID S-11: Product Handling System No. 3

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-11 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 319) followed by a HEPA filter.

(f) Stack ID S-13: Material Handling System

Material is pneumatically conveyed from the dump station to one of three hoppers.

Emissions units associated with Stack ID S-13 were installed in November, 1981.

Emissions from this system are controlled by bin vent filters (No. 653, 654, & 655) and a HEPA filter.

(g) Stack ID S-16: Blended Product Handling System

Blended product is pneumatically conveyed from the blender to one of three hoppers to await packaging.

Emissions units associated with Stack ID S-16 were installed in November, 1981.

Emissions from this system are controlled by bin vent filters (No. 650, 651, & 652) and a HEPA filter.

(h) Stack ID S-20: Central Vacuum System/No. 1 Dryer Vacuum System

The Central Vacuum System is used for general housekeeping throughout the plant.

Emission units associated with Stack S-20 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 447).

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

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

A.5 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) deleted

by this permit.

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

SECTION B General Conditions

- B.1 Permit No Defense [IC 13]
Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation, or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.
- B.2 Definitions [326 IAC 2-8-1]
Terms in this permit shall have the meaning 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.3 Permit Term [326 IAC 2-8-4(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.4 Enforceability [326 IAC 2-8-6]
(a) 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, HDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by HDEM.
- B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]
The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.
- B.6 Severability [326 IAC 2-8-4(4)]
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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
This permit does not convey any property rights of any sort, or any exclusive privilege.
- B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
(a) The Permittee shall furnish to IDEM, OAQ and HDEM within a reasonable time, any information that IDEM, OAQ and HDEM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and HDEM copies of records required to be kept by this permit.
(b) For information furnished by the Permittee to IDEM, OAQ and HDEM, 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
IDEM, OAQ and HDEM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.
- B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).
- B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15th of each year to:
- Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- and
- Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320
- (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 and HDEM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;

- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ and HDEM may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and HDEM. IDEM, OAQ and HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;

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- (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 HDEM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027
(ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

and

HDEM:
Telephone No.: 219-853-6306
Facsimile No.: 219-853-6343

- (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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ and HDEM may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
 - (h) The permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or HDEM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or HDEM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or HDEM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or HDEM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and HDEM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

and to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

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

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

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

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

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and HDEM 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 and HDEM, any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

and to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

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

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. A basic filing fee of one hundred dollars (\$100) shall be submitted with any request for an administrative amendment submitted to HDEM for review. [326 IAC 2-8-10(b)(3)] [326 IAC 2-1.1-10(d)]
- (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 Operational Flexibility [326 IAC 2-8-15] [326 2-8-11.1]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the 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

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

and

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

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

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

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

- (b) **Emission Trades** [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios** [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

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

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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 twenty percent (20%) 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.

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- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.
- C.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 Fugitive Dust Emissions [326 IAC 6-1-11.1]
The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).
- C.7 Lake County Particulate Matter Contingency Measures [326 IAC 6-1-11.2]
The Permittee shall comply with the applicable provisions of 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures).
- C.8 Operation of Equipment [326 IAC 2-8-5(a)(4)]
Except as otherwise provided by statute, 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 are in operation.
- C.9 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- C.10 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

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

C.11 Performance Testing [326 IAC 3-6]

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

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

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and HDEM 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.12 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.14 Continuous Compliance Plan [326 IAC 6-1-10.1(l)]

Pursuant to 326 IAC 6-1-10.1(l) (Lake County PM10 Emission Requirements), the Permittee shall submit to IDEM, OAQ and HDEM, and maintain at the source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the inspections, monitoring, and record keeping requirements as specified in 326 IAC 6-1-10.1(p) through (r) or according to the Permittee’s CCP.

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- C.15 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.16 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]
- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

- C.17 Risk Management Plan [326 IAC 2-8-4] [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.18 Compliance Response Plan – Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]
- (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 and HDEM 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 is 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 time frame 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 CFR 60/63 requirement.

-
- (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 of 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 an administrative amendment 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 response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

The response action documents submitted pursuant to this condition do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

C.20 Emission Reporting [326 IAC 2-8-4(3)] [Hammond Ordinance No. 7102]

- (a) The Permittee shall submit an annual emission inventory containing production information, fuel usage and estimated actual emissions of criteria pollutants. The emission inventory must be received by April 15th of each year. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. This is a local requirement only. The emission inventory must be submitted to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

This inventory does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The emission inventory 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 HDEM on or before the date it is due.

C.21 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM with 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.22 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

and to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

- (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, and HDEM on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.23 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 2-8-4(10)]:

Stack ID S-6: Mill Line No. 1

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper.

Emissions units associated with Stack ID S-6 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 209) followed by a HEPA filter.

Stack ID S-7: Mill Line No. 2

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-7 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 236) followed by a HEPA filter.

Stack ID S-8: Mill Line No. 3

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-8 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 247) followed by a HEPA filter.

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

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

- D.1.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-14] [326 IAC 2-8-4] Pursuant to 326 IAC 6.8-2-14 (formerly 326 IAC 6-1-10.1(d)) (Lake County PM10 emission requirements), the PM10 emissions from Stack IDs S-6, S-7, & S-8 shall be limited to 0.022 gr/dscf and 0.570 lbs/hr, per stack, which is equivalent to 2.497 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

- D.1.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack IDs S-6, S-7, & S-8, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.05 lbs/hr, per stack, which is equivalent to 0.22 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

- D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]
During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.1.2, the Permittee shall perform Pb testing on Stack ID S-7 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.
- D.1.5 Particulate Matter less than 10 microns in diameter (PM10)
In order to comply with Condition D.1.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.1.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]
In order to comply with Condition D.1.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

- D.1.7 Visible Emissions Notations
- (a) Visible emission notations of the Stack IDs S-6, S-7, & S-8 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack IDs S-6, S-7, & S-8, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-6)

Bag Filter No. 209: 0.1 – 10 inches of water

HEPA: 0.1 – 10 inches of water

(Stack ID S-7)

Bag Filter No. 236: 0.1 – 5 inches of water

HEPA: 0.1 – 10 inches of water

(Stack ID S-8)

Bag Filter No. 247: 0.1 – 10 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 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.

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- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the Stack IDs S-6, S-7, & S-8 stack exhaust once per day.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Stack ID S-12: Material Dump Station

Bags of material are dumped into a bulk / bagged material dump station.

Emissions units associated with Stack ID S-12 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 506) followed by a HEPA filter.

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

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

- D.2.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-14] [326 IAC 2-8-4] Pursuant to 326 IAC 6.8-2-14 (formerly 326 IAC 6-1-10.1(d)) (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-12 shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.2.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4] Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-12, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)] A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

- D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11] During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.2.2, the Permittee shall perform Pb testing on Stack ID S-12 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.
- D.2.5 Particulate Matter less than 10 microns in diameter (PM10) In order to comply with Condition D.2.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.2.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

In order to comply with Condition D.2.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.2.7 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-12 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.2.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-12, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-12)
Bag Filter No. 506: 0.1 – 5 inches of water
HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-12 stack exhaust once per day.
- (b) To document compliance with Condition D.2.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Stack ID S-14: Blend Scale Hopper

Material is conveyed from the material handling system and product handling systems to a surge hopper, weighed through a Blend Scale Hopper, and then fed into a blender or to a Bulk/Bag Packaging System.

Emissions units associated with Stack ID S-14 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 455) followed by a HEPA filter.

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

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

- D.3.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-14] [326 IAC 2-8-4] Pursuant to 326 IAC 6.8-2-14 (formerly 326 IAC 6-1-10.1(d)) (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-14 shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.3.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4] Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-14, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)] A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

- D.3.4 Particulate Matter less than 10 microns in diameter (PM10)
In order to comply with Condition D.3.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.3.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]
In order to comply with Condition D.3.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.3.6 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-14 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-14, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-14)

Bag Filter No. 455: 0.1 – 5 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.3.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding

response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-14 stack exhaust once per day.
- (b) To document compliance with Condition D.3.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.3.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

Stack ID S-15: Blender

Material from the Blend Scale Hopper is fed to a Blend Product Hopper, blended, and then sent to a Blended Product Storage Hopper.

Emissions units associated with Stack ID S-15 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 301) followed by a HEPA unit.

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

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

- D.4.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-14] [326 IAC 2-8-4] Pursuant to 326 IAC 6.8-2-14 (formerly 326 IAC 6-1-10.1(d)) (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-15 shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.4.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4] Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-15, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.4.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)] A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

- D.4.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11] During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.4.2, the Permittee shall perform Pb testing on Stack ID S-15 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.
- D.4.5 Particulate Matter less than 10 microns in diameter (PM10) In order to comply with Condition D.4.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.4.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

In order to comply with Condition D.4.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.4.7 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-15 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.4.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-15, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-15)
Bag Filter No. 301: 0.1 – 5 inches of water
HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.4.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.4.10 Record Keeping Requirements

- (a) To document compliance with Condition D.4.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-15 stack exhaust once per day.
- (b) To document compliance with Condition D.4.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.4.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

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

Stack ID S-17: Bulk/Bag Packaging System, Mixed Metals System, and Two (2) Portable Packing Stations

Unit ID: S-17-1: Bulk/Bag Packaging System

Product is loaded into either bulk containers or consumable bags for shipment.

Emissions units associated with Stack ID S-17 were installed in November, 1981.

Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

Unit ID: S-17-2: Mixed Metals System

Products are fed into a dump station and transferred to a blender. The blender discharges to a pneumatic conveying line which transfers the blended product to a surge hopper which feeds the bulk/bag packaging stations. The surge hopper can also receive product directly from the Blended Product Handling System for packaging.

Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

Unit ID: S-17-3: Two (2) Portable Packing Stations

Products from a portable tote bin are packaged in bags for shipment.

Emissions from each station are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

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

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

- D.5.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-14] [326 IAC 2-8-4] Pursuant to 326 IAC 6.8-2-14 (formerly 326 IAC 6-1-10.1(d)) (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-17 shall be limited to 0.022 gr/dscf and 1.990 lbs/hr which is equivalent to 8.716 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.5.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4] Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-17, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.07 lbs/hr which is equivalent to 0.31 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.5.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.5.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.5.2, the Permittee shall perform Pb testing on Stack S-17 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.5.5 Particulate Matter less than 10 microns in diameter (PM10)

In order to comply with Condition D.5.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.5.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

In order to comply with Condition D.5.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.5.7 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-17 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.5.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-17, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-17)

Exhaust Bag Filter No. 430: 0.1 - 5

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.5.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.5.10 Record Keeping Requirements

- (a) To document compliance with Condition D.5.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-17 stack exhaust once per day.
- (b) To document compliance with Condition D.5.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.5.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.6 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

Stack ID S-3: Acid Dispersion System

Dry acid is poured into a dispersion tank where water is added.

Emissions units associated with Stack ID S-3 were installed in November, 1981.

There are no emission controls on this unit.

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

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

D.6.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6.8] [326 IAC 2-8-4]

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Stack ID S-3 shall be limited to 1.000 lb/hr which is equivalent to 4.380 tons/yr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.6.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM10 emissions from Stack ID S-3 shall be limited to 1.000 lb/hr which is equivalent to 4.380 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.6.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.6.4 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-3 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

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- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.6.5 Record Keeping Requirements

- (a) To document compliance with Condition D.6.4, the Permittee shall maintain records of visible emission notations of the Stack ID S-3 exhaust once per day.
- (b) To document compliance with Condition D.6.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.7 FACILITY OPERATION CONDITIONS – INSIGNIFICANT ACTIVITY

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

Stack ID S-4: No. 1 Dryer

Reacted compound is conveyed to the dryer to evaporate off water.

Emissions units associated with Stack ID S-4 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 204) followed by a HEPA filter.

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

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

- D.7.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-14] [326 IAC 2-8-4] Pursuant to 326 IAC 6.8-2-14 (formerly 326 IAC 6-1-10.1(d)) (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-4 shall be limited to 0.022 gr/dscf and 1.460 lbs/hr which is equivalent to 6.395 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.7.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4] Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-4, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.07 lbs/hr which is equivalent to 0.31 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.7.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)] A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

- D.7.4 Particulate Matter less than 10 microns in diameter (PM10)
In order to comply with Condition D.7.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.7.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]
In order to comply with Condition D.7.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.7.6 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-4 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.7.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-4, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-4)

Bag Filter No. 204: 0.1 – 5 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.7.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding

response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.7.9 Record Keeping Requirements

- (a) To document compliance with Condition D.7.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-4 stack exhaust once per day.
- (b) To document compliance with Condition D.7.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.7.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.8 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

Stack ID S-5: Dryer No. 1 Containment System

This stack services the Dryer No. 1 containment system and rework unloading station. The containment system encloses the No. 1 Dryer and captures fugitive emissions in order to reduce employee exposure. The rework unloading station is used to feed rework material to the dryer discharge.

Emissions units associated with Stack ID S-5 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 226) followed by a HEPA filter.

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

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

- D.8.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-14] [326 IAC 2-8-4] Pursuant to 326 IAC 6.8-2-14 (formerly 326 IAC 6-1-10.1(d)) (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-5 shall be limited to 0.022 gr/dscf and 1.030 lbs/hr which is equivalent to 4.511 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.8.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4] Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-5, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.07 lbs/hr which is equivalent to 0.31 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.8.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)] A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

- D.8.4 Particulate Matter less than 10 microns in diameter (PM10) In order to comply with Condition D.8.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.8.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)] In order to comply with Condition D.8.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.8.6 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-5 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.8.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-5, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-5)

Bag Filter No. 226: 0.1 – 10 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.8.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding

response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.8.9 Record Keeping Requirements

- (a) To document compliance with Condition D.8.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-5 stack exhaust once per day.
- (b) To document compliance with Condition D.8.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.8.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.9 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

Stack ID S-18: Boiler No. 1

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

Stack ID S-19: Boiler No. 2

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

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

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

D.9.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-6-9][326 IAC 2-8-4] Pursuant to 326 IAC 6.8-6-9 (formerly 326 IAC 6-1-10.1(h)(12)) (Lake County PM10 emission requirements), the PM10 emissions for Stack IDs S-18 and S-19 shall be limited to 0.003 lbs/MMBtu and 0.008 lb/hr, per stack, as specifically listed in 326 IAC 6.8-6-9 and shall fire natural gas only.

D.9.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

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

D.9.3 Record Keeping Requirements

- (a) To document compliance with Condition D.9.1, the Permittee shall maintain monthly records of the fuel usage for each boiler. These records shall be made available upon request by HDEM or IDEM, OAQ.
- (b) To document compliance with Condition D.9.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.10 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

Stack ID S-21: Dryer No. 3

Reacted compound is conveyed into a drying chamber to evaporate off water. The dried product is separated from the air stream in a product recovery baghouse.

Emissions units associated with Stack ID S-21 were installed in October, 1996.

Emissions from this system are controlled by a product recovery baghouse (No. 805) and a HEPA filter.

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

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

D.10.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6.8] [326 IAC 2-8-4]

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Stack ID S-21 shall be limited to 2.497 lbs/hr which is equivalent to 10.935 tons/yr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.10.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM10 emissions from Stack ID S-21 shall be limited to 2.497 lbs/hr which is equivalent to 10.935 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.10.3 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-21, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.07 lbs/hr which is equivalent to 0.31 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.10.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.10.5 Particulate Matter less than 10 microns in diameter (PM10)

In order to comply with Condition D.10.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.10.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

In order to comply with Condition D.10.3, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.10.7 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-21 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.10.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-21, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-21)

Baghouse: 0.1 – 10 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.10.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.10.10 Record Keeping Requirements

- (a) To document compliance with Condition D.10.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-21 stack exhaust once per day.
- (b) To document compliance with Condition D.10.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.10.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.11 FACILITY OPERATION CONDITIONS

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

Stack ID S-22: Dryer No. 5

Reacted compound paste is conveyed (wet) into a drying screw. Hot air from combustion of natural gas is passed around the slurry, evaporating the water in the paste. The product is then milled and packed out in bags.

Emissions units associated with Stack ID S-22 were installed in 2006.

Emissions from this system are controlled by a bag filter followed by a HEPA unit.

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

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

- D.11.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6.8] [326 IAC 2-8-4]
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Stack ID S-22 shall be limited to 0.002 lb/hr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.11.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM10 emissions from Stack ID S-22 shall be limited to 0.002 lbs/hr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.11.3 Lead (Pb) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the Pb emissions from Stack S-22 shall be limited to 0.0001 lbs/hr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.11.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

- D.11.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]
Within 180 days after issuance of minor permit revision 089-23378-00218, in order to demonstrate compliance with Conditions D.11.1, D.11.2, and D.11.3, the Permittee shall perform Pb testing on Stack S-22 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.11.6 Particulate Matter less than 10 microns in diameter (PM10)

In order to comply with Condition D.11.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.11.7 Lead (Pb)

In order to comply with Condition D.11.3, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.11.8 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-22 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.11.9 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-22, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-22)
Baghouse: 1 – 8 inches of water
HEPA: 1 – 8 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C –

Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.11.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.11.11 Record Keeping Requirements

- (a) To document compliance with Condition D.11.8, the Permittee shall maintain records of visible emission notations of the Stack ID S-22 stack exhaust once per day.
- (b) To document compliance with Condition D.11.9, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.11.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.12 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

Stack ID S-1: Feedstock Handling System

Feedstock is pneumatically conveyed from bulk delivery trucks to a storage hopper, a weigh hopper and finally fed to a dispersion system.

Emissions units associated with Stack ID S-1 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 121) followed by a HEPA filter.

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

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

D.12.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-14] [326 IAC 2-8-4]
Pursuant to 326 IAC 6.8-2-14 (formerly 326 IAC 6-1-10.1(d)) (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-1 shall be limited to 0.022 gr/dscf and 0.220 lbs/hr which is equivalent to 0.964 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.12.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-1, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.12.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.12.4 Particulate Matter less than 10 microns in diameter (PM10)
In order to comply with Condition D.12.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.12.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]
In order to comply with Condition D.12.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.12.6 Visible Emissions Notations

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

D.12.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-1, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-1)

Bin Vent Filter No. 121: 0.1 – 10 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.12.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding

response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.12.9 Record Keeping Requirements

- (a) To document compliance with Condition D.12.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-1 stack exhaust once per day.
- (b) To document compliance with Condition D.12.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.12.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.13 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

Stack ID S-2: Dispersion System

Feedstock is fed to a dispersion tank where it is mixed with water and acid and then fed to a reactor.

Emissions units associated with Stack ID S-2 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 115) followed by a HEPA filter.

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

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

- D.13.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-14] [326 IAC 2-8-4]
Pursuant to 326 IAC 6.8-2-14 (formerly 326 IAC 6-1-10.1(d)) (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-2 shall be limited to 0.022 gr/dscf and 0.080 lbs/hr which is equivalent to 0.350 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.13.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-2, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.03 lbs/hr which is equivalent to 0.13 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.13.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

- D.13.4 Particulate Matter less than 10 microns in diameter (PM10)
In order to comply with Condition D.13.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.13.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]
In order to comply with Condition D.13.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.13.6 Visible Emissions Notations

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

D.13.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-2, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of the following:

(Stack ID S-2)

Bag Filter No. 115: 0.1 – 10 inches of water

HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.13.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding

response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.13.9 Record Keeping Requirements

- (a) To document compliance with Condition D.13.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-2 stack exhaust once per day.
- (b) To document compliance with Condition D.13.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.13.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.14 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

Stack ID S-9: Product Handling System No. 1

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-9 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 317) followed by a HEPA filter.

Stack ID S-10: Product Handling System No. 2

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-10 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 318) followed by a HEPA filter.

Stack ID S-11: Product Handling System No. 3

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-11 were installed in November, 1981.

Emissions from this system are controlled by a bin vent filter (No. 319) followed by a HEPA filter.

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

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

- D.14.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-14] [326 IAC 2-8-4]
Pursuant to 326 IAC 6.8-2-14 (formerly 326 IAC 6-1-10.1(d)) (Lake County PM10 emission requirements), the PM10 emissions from Stack IDs S-9, S-10, & S-11 shall be limited to 0.022 gr/dscf and 0.200 lbs/hr, per stack, which is equivalent to 0.876 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.14.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack IDs S-9, S-10, & S-11, as specifically listed in 326 IAC 15-1-2(a)(7) shall be limited to 0.04 lbs/hr, per stack, which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.14.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.14.4 Particulate Matter less than 10 microns in diameter (PM10)

In order to comply with Condition D.14.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.14.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

In order to comply with Condition 14.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.14.6 Visible Emissions Notations

- (a) Visible emission notations of the Stack IDs S-9, S-10, & S-11 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.14.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack IDs S-9, S-10, & S-11, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-9)

Bin Vent Filter No. 317: 0.1 – 5 inches of water
HEPA: 0.1 – 10 inches of water

(Stack ID S-10)

Bin Vent Filter No. 318: 0.1 – 5 inches of water
HEPA: 0.1 – 10 inches of water

(Stack ID S-11)

Bin Vent Filter No. 319: 0.1 – 10 inches of water
HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.14.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.14.9 Record Keeping Requirements

- (a) To document compliance with Condition D.14.6, the Permittee shall maintain records of visible emission notations of the Stack IDs S-9, S-10, & S-11 stack exhaust once per day.
- (b) To document compliance with Condition D.14.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.14.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.15 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

Stack ID S-13: Material Handling System

Material is pneumatically conveyed from the dump station to one of three hoppers.

Emissions units associated with Stack ID S-13 were installed in November, 1981.

Emissions from this system are controlled by bin vent filters (No. 653, 654, & 655) and a HEPA filter.

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

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

- D.15.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-14] [326 IAC 2-8-4]
Pursuant to 326 IAC 6.8-2-14 (formerly 326 IAC 6-1-10.1(d)) (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-13 shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.15.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-13, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.15.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

- D.15.4 Particulate Matter less than 10 microns in diameter (PM10)
In order to comply with Condition D.15.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.15.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]
In order to comply with Condition D.15.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.15.6 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-13 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.15.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-13, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-13)

Bin Vent Filter No. 653: 0.1 – 5 inches of water
Bin Vent Filter No. 654: 0.1 – 5 inches of water
Bin Vent Filter No. 655: 0.1 – 10 inches of water
HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.15.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of

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

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.15.9 Record Keeping Requirements

- (a) To document compliance with Condition D.15.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-13 stack exhaust once per day.
- (b) To document compliance with Condition D.15.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.15.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.16 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

Stack ID S-16: Blended Product Handling System

Blended product is pneumatically conveyed from the blender to one of three hoppers to await packaging.

Emissions units associated with Stack ID S-16 were installed in November, 1981.

Emissions from this system are controlled by bin vent filters (No. 650, 651, & 652) and a HEPA filter.

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

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

- D.16.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-14] [326 IAC 2-8-4]
Pursuant to 326 IAC 6.8-2-14 (formerly 326 IAC 6-1-10.1(d)) (Lake County PM10 emission requirements), the PM10 emissions from Stack ID S-16 shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.16.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-16, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.
- D.16.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

- D.16.4 Particulate Matter less than 10 microns in diameter (PM10)
In order to comply with Condition D.16.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- D.16.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]
In order to comply with Condition D.16.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.16.6 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-16 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.16.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-16, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-16)

Bin Vent Filter No. 650: 0.1 – 10 inches of water
Bin Vent Filter No. 651: 0.1 – 10 inches of water
Bin Vent Filter No. 652: 0.1 – 10 inches of water
HEPA: 0.1 – 10 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.16.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of

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

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.16.9 Record Keeping Requirements

- (a) To document compliance with Condition D.16.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-16 stack exhaust once per day.
- (b) To document compliance with Condition D.16.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.16.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.17 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

Stack ID S-20: Central Vacuum System/No. 1 Dryer Vacuum System

The Central Vacuum System is used for general housekeeping throughout the plant.

Emissions units associated with Stack ID S-20 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 447).

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

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

D.17.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6.8] [326 IAC 2-8-4]

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Stack ID S-20 shall be limited to 0.029 lb/hr which is equivalent to 0.127 tons/yr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.17.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM10 emissions from Stack ID S-20 shall be limited to 0.029 lb/hr which is equivalent to 0.127 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.17.3 Lead (Pb) [Hammond AQC Ordinance No. 3522 (as amended)]

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the Pb emissions from Stack S-20 shall be limited to 0.024 lbs/hr which is equivalent to 0.105 tons/yr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.17.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.17.5 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-20 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

-
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.17.6 Record Keeping Requirements

- (a) To document compliance with Condition D.17.5, the Permittee shall maintain records of visible emission notations of the Stack ID S-20 exhaust once per day.
- (b) To document compliance with Condition D.17.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: **Halstab Division of Hammond Group, Inc.**
Source Address: 3100 Michigan Street, Hammond, Indiana 46323
Mailing Address: 1414 Field Street, P.O. Box 6408, Hammond, Indiana 46325-6408
FESOP No.: **F089-14167-00218**

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AIR POLLUTION CONTROL DIVISION
5925 CALUMET AVENUE
HAMMOND, INDIANA 46320**

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

Source Name: **Halstab Division of Hammond Group, Inc.**
Source Address: 3100 Michigan Street, Hammond, Indiana 46323
Mailing Address: 1414 Field Street, P.O. Box 6408, Hammond, Indiana 46325-6408
FESOP No.: **F089-14167-00218**

This form consists of 2 pages

Page 1 of 2

<p>— This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM), within four (4) business hours (1- 800-451-6027 or 317-233-5674, ask for IDEM Compliance Section) and (219-853-6306, for HDEM); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967, IDEM and 219-853-6343, HDEM), and follow the other requirements of 326 IAC 2-7-16.
--

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AIR POLLUTION CONTROL DIVISION**

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

Source Name: **Halstab Division of Hammond Group, Inc.**
Source Address: 3100 Michigan Street, Hammond, Indiana 46323
Mailing Address: 1414 Field Street, P.O. Box 6408, Hammond, Indiana 46325-6408
FESOP No.: **F089-14167-00218**

Months: _____ to _____ Year: _____

Page 1 of 2

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".

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
Hammond Department of Environmental Management
Air Pollution Control Division**

Technical Support Document (TSD) for a Minor Permit Revision to a
Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Halstab Division of Hammond Group, Inc. (Halstab)
Source Location:	3100 Michigan Street, Hammond, Indiana 46323
County:	Lake
SIC Code:	2819 – Industrial Inorganic Chemicals, nec 2869 – Industrial Organic Chemicals, nec
Operation Permit No.:	FESOP 089-14167-00218
Operation Permit Issuance Date:	June 16, 2005
Permit Revision No.:	089-23378-00218
Permit Reviewer:	Debra Malone, HDEM

The Hammond Department of Environmental Management (HDEM) has reviewed an application from Halstab Division of Hammond Group, Inc. (Halstab) relating to the modification of an Industrial Inorganic and Organic Chemicals Manufacturing Plant.

History

On May 31, 2006, Halstab submitted an application to the HDEM requesting to replace Dryer No. 4 System, Stack ID S-22 with Dryer No. 5 System in order to accommodate a new product. This dryer will no longer be used due to dust exposure problems.

Existing Approvals

The source was issued a Federally Enforceable State Operating Permit Renewal (F089-14167-00218) on June 16, 2005. The source has since received the following approvals:

- (a) First Administrative Amendment No.: 089-22698, issued on March 15, 2006.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-22	Dryer No. 5 System	66	0.67	1608	250

Recommendation

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

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

An application for the purposes of this review was received on May 31, 2006, additional information was received on July 11 & 27, 2006 and September 25 & 27, 2006.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. A summary of the calculations is provided in Appendix A of this document (1 page).

Potential To Emit

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

Pollutant	Potential To Emit (tons/year)
PM	123.025
PM-10	123.025
SO ₂	0.039
VOC	0.348
CO	1.315
NO _x	6.572

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Inorganic Lead Compounds as Lead (Pb)	96.250
TOTAL	96.250

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of Particulate Matter less than 10 microns (PM10) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The permittee has taken limits to be a FESOP source.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The permittee has taken limits to be a FESOP source.
- (c) **Fugitive Emissions**
This type of operation is considered a chemical process plant, one of the twenty-eight (28) listed source categories under 326 IAC 2-2; therefore, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD and Emission Offset applicability. However, there are no fugitive PM or VOC emissions to be added.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2005 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.291
PM-10	0.291
SO ₂	0.004
VOC	0.032
CO	0.122
NO _x	0.609
Pb	0.001

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the emission unit.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs/ Pb
Stack ID S-1 Feedstock Handling System	-	0.964	-	-	-	-	0.18
Stack ID S-2 Dispersion System	-	0.350	-	-	-	-	0.13
Stack ID S-3 Acid Dispersion System	4.380	4.380	-	-	-	-	-
Stack ID S-4 No. 1 Dryer	-	6.395	0.015	0.130	0.491	2.453	0.31
Stack ID S-5 Dryer No. 1 Containment System	-	4.511	-	-	-	-	0.31
Stack ID S-6 Mill Line No. 1	-	2.497	-	-	-	-	0.22
Stack ID S-7 Mill Line No. 2	-	2.497	-	-	-	-	0.22
Stack ID S-8 Mill Line No. 3	-	2.497	-	-	-	-	0.22
Stack ID S-9 Product Handling System No. 1	-	0.876	-	-	-	-	0.18
Stack ID S-10 Product Handling System No. 2	-	0.876	-	-	-	-	0.18
Stack ID S-11 Product Handling System No. 3	-	0.876	-	-	-	-	0.18
Stack ID S-12 Material Dump Station	-	0.876	-	-	-	-	0.18
Stack ID S-13 Material Handling System	-	0.876	-	-	-	-	0.18
Stack ID S-14 Blend Scale Hopper	-	0.876	-	-	-	-	0.18
Stack ID S-15 Blender	-	0.876	-	-	-	-	0.18
Stack ID S-16 Blended Product Handling System	-	0.876	-	-	-	-	0.18
Stack ID S-17 Bulk/Bag Packaging System, Mixed Metals System, & Two (2) Portable Packing Stations	-	8.716	-	-	-	-	0.31
Stack ID S-18 Boiler No. 1	0.084	0.035	0.007	0.061	0.924	1.10	-
Stack ID S-19 Boiler No. 2	0.084	0.035	0.007	0.061	0.924	1.10	-
Stack ID S-20 Central Vacuum System/No. 1 Dryer Vacuum System	0.127	0.127	-	-	-	-	0.105
Stack ID S-21 Dryer No. 3	10.935	10.935	0.010	0.090	0.340	1.701	0.31
Stack ID S-22 Dryer No. 5	0.007	0.007	0.001	0.012	0.044	0.219	0.0004
Total PTE After Issuance	15.617	50.954	Negligible	Negligible	2.723	6.573	3.755

For Stack IDs S-1, S-2, S-4, S-5, S-6, S-7, S-8, S-9, S-10, S-11, S-12, S-13, S-14, S-15, S-16, S-17, S-18, and S-19:

PM10 emissions are limited in accordance with 326 IAC 6.8-2-14 or 326 IAC 6.8-6-9.

For Stack IDs S-3, S-20, S-21, and S-22:

PM10 emissions are limited in accordance with the Hammond Air Quality Control Ordinance No. 3522 (as amended).

Lead and HAPs emissions are limited in accordance with 326 IAC 15-1-2(a)(7).

For Stack IDs S-20 and S-22:

Lead and HAPs emissions are limited in accordance with the Hammond Air Quality Control Ordinance No. 3522 (as amended).

Justification for Revision

Halstab was issued a Federally Enforceable State Operating Permit (FESOP) renewal on June 16, 2005 for a stationary Industrial Inorganic and Organic Chemicals Manufacturing Plant. An application requesting changes to this permit was received on May 31, 2006. The FESOP is being modified through a Minor Permit Revision pursuant to 326 IAC 2-8-11.1(e) because it involves minor changes to the permit that include the replacement of a dryer with another dryer due to current dust exposure problems. The new dryer system will produce half of what the current dryer system produces. The new dryer system is controlled by a bag filter followed by a HEPA unit resulting in fewer emissions. The maximum design rate of Dryer No. 4 system was 1 ton/hr and it was limited to 0.359 lb/hr or 1.572 tons per year of PM and PM10 which was its potential to emit after controls per the Hammond Air Quality Control Ordinance No. 3522 (as amended). The maximum design rate of Dryer No. 5 system is 0.5 ton/hr and it is limited to 0.002 lb/hr or 0.007 tons per year of PM and PM10 which is its potential to emit after controls per the Hammond Air Quality Control Ordinance No. 3522 (as amended). The potential to emit of lead is less than five (5) tons per year but greater than two-tenths (0.2) ton per year.

This modification qualifies as a minor permit revision under 326 IAC 2-8-11.1(d)(4)(G) and 326 IAC 2-8-11.1(d)(5)(C)(i). 326 IAC 2-8-11.1(d)(4)(G) states that a modification that would have a potential to emit less than five (5) tons per year and equal to or greater than two-tenths (0.2) ton per year of lead (Pb) requires a minor permit revision. 326 IAC 2-8-11.1(d)(5)(C)(i) states that a modification for which the potential to emit is limited to less than twenty-five tons per year of any regulated pollutant other than hazardous air pollutants by using a particulate air pollution control device to achieve and maintain ninety-nine percent (99%) efficiency requires a minor permit revision.

County Attainment Status

On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana. Therefore, the above-mentioned changes will be made to the permit.

The source is located in Lake County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO ₂	Attainment
NO ₂	Unclassifiable/Attainment
8-hour Ozone	Moderate Nonattainment
CO	Unclassifiable/Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as moderate nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Lake County has been classified as attainment or unclassifiable in Indiana for PM10, SO₂, NO₂, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a lawsuit 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 violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
This type of operation is considered a chemical process plant, one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and 2-3; therefore, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD and Emission Offset applicability. However, there are no fugitive PM or VOC emissions to be added.

Federal Rule Applicability

There are no changes to federal rules included in this Minor Permit Revision to a FESOP.

State Rule Applicability

Changes to state rules included in this Minor Permit Revision to a FESOP are as follows:

One change is replacing the rule cite for 326 IAC 6-1 with 326 IAC 6.8. 326 IAC 6-1 has been repealed. All Lake County PM limitations have been put into 326 IAC 6.8. This change has also been made throughout the entire permit.

The rule cite 326 IAC 6-1 has been modified to 326 IAC 6.8 in the authority line of Condition D.11.1 Particulate Matter (PM). The rule cite 326 IAC 2-8-4 has also been added to the authority lines of Conditions D.11.1 Particulate Matter (PM) and D.11.3 Lead (Pb). This change has also been made throughout the entire permit.

Per 326 IAC 2-8-4, emission limitations ensuring that the source total PM, PM10, and Pb emissions stay below 100, 100, and 10 tons/yr, respectively are as stated below.

Local Rule Applicability

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from the following emission units shall not exceed the pounds per hour emission rates listed below:

Stack ID	PM Emission Limit (lbs/hr)	PM Emission Limit (tons/year)
S-22	0.002	0.007

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM10 emissions from the following emission units shall not exceed the pounds per hour emission rates listed below:

Stack ID	PM ₁₀ Emission Limit (lbs/hr)	PM ₁₀ Emission Limit (tons/year)
S-22	0.002	0.007

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the Pb emissions from the following emission units shall not exceed the pounds per hour emission rates listed below:

Stack ID	Pb Emission Limit (lbs/hr)	Pb Emission Limit (tons/year)
S-22	0.0001	0.0004

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The source has applicable compliance monitoring conditions as specified below:
 - (a) Once per day visible emissions notations of Stack ID S-22 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the control equipment controlling S-22 at least once per day when the associated process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the control equipment shall be maintained within the ranges specified for each stack ID listed in the permit. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above-mentioned range for any one reading.
 - (c) In the event that bag failure has been observed:

For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

These monitoring conditions are necessary because the control equipment must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).

Changes to the FESOP

The following changes were requested in the application for this Minor Permit Revision. Bolded language has been added, and the language with a line through it has been deleted. The Table of Contents has been modified and conditions have been renumbered to reflect these changes.

1. On page 13 of 94, under Emission Units and Pollution Control Equipment Summary, (h) Stack ID S-22: Dryer No. 5 has been added.

(h) Stack ID S-22: Dryer No. 5

Reacted compound paste is conveyed (wet) into a drying screw. Hot air from combustion of natural gas is passed around the slurry, evaporating the water in the paste. The product is then milled and packed out in bags.

Emissions units associated with Stack ID S-22 were installed in 2006.

Emissions from this system are controlled by a bag filter followed by a HEPA unit.

Information on pages 13 and 14 has been shifted due to this change.

2. On pages 14 and 15 of 94, under A.3 Insignificant Activities, (g) Stack ID S-22: Dryer No. 4 has been deleted and all insignificant activities that follow were re-lettered.

- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

~~(g) Stack ID S-22: Dryer No. 4~~

~~Reacted compound is conveyed into a drying chamber. The dried product is separated from the air stream in a product recovery baghouse and packed out in bags.~~

~~Emission units associated with Stack ID S-22 were installed in June, 2002.~~

~~There are no emission controls on this unit.~~

- (g) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (h) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (i) Combustion source flame safety purging on startup.

3. On pages 70 through 72 of 94, Section D.11 has been deleted and replaced with the following:

~~SECTION D.11 FACILITY OPERATION CONDITIONS – INSIGNIFICANT ACTIVITY~~

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

~~Stack ID S-22: Dryer No. 4~~

~~Reacted compound is conveyed into a drying chamber. The dried product is separated from the air stream in a product recovery baghouse and packed out in bags.~~

~~Emissions units associated with Stack ID S-22 were installed in June, 2002.~~

~~There are no emission controls on this unit.~~

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

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

~~D.11.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6-1]
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Stack ID S-22 shall be limited to 0.359 lbs/hr which is equivalent to 1.572 tons/yr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 6-1 do not apply.~~

~~D.11.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM10 emissions from Stack ID S-22 shall be limited to 0.359 lbs/hr which is equivalent to 1.572 tons/yr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.~~

~~D.11.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

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

~~D.11.4 Visible Emissions Notations~~

- ~~(a) Visible emission notations of the Stack ID S-22 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

- (d) ~~A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

Record Keeping Requirements ~~[326 IAC 2-8-4(3)] [326 IAC 2-8-16]~~

~~D.11.5 Record Keeping Requirements~~

- (a) ~~To document compliance with Condition D.11.4, the Permittee shall maintain records of visible emission notations of the Stack ID S-22 stack exhaust once per day.~~
- (b) ~~To document compliance with Condition D.11.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- (c) ~~All records shall be maintained in accordance with Section C—General Record Keeping Requirements, of this permit.~~

SECTION D.11 FACILITY OPERATION CONDITIONS

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

Stack ID S-22: Dryer No. 5

Reacted compound paste is conveyed (wet) into a drying screw. Hot air from combustion of natural gas is passed around the slurry, evaporating the water in the paste. The product is then milled and packed out in bags.

Emissions units associated with Stack ID S-22 were installed in 2006.

Emissions from this system are controlled by a bag filter followed by a HEPA unit.

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

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

D.11.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 6.8] [326 IAC 2-8-4]

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Stack ID S-22 shall be limited to 0.002 lb/hr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.11.2 Particulate Matter less than 10 microns in diameter (PM10) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM10 emissions from Stack ID S-22 shall be limited to 0.002 lbs/hr. This requirement will ensure that the source total PM10 emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.11.3 Lead (Pb) [Hammond AQC Ordinance No. 3522 (as amended)] [326 IAC 2-8-4]

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the Pb emissions from Stack S-22 shall be limited to 0.0001 lbs/hr. This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.11.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.11.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Within 180 days after issuance of minor permit revision 089-23378-00218, in order to demonstrate compliance with Conditions D.11.1, D.11.2, and D.11.3, the Permittee shall perform Pb testing on Stack S-22 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.

D.11.6 Particulate Matter less than 10 microns in diameter (PM10)

In order to comply with Condition D.11.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

D.11.7 Lead (Pb)

In order to comply with Condition D.11.3, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

D.11.8 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-22 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.11.9 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-22, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-22)

Baghouse: 1 – 8 inches of water

HEPA: 1 – 8 inches of water

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.11.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.11.11 Record Keeping Requirements

- (a) To document compliance with Condition D.11.8, the Permittee shall maintain records of visible emission notations of the Stack ID S-22 stack exhaust once per day.
- (b) To document compliance with Condition D.11.9, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.11.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

4. On page 11 of 94, Condition A.1 has been revised to reflect changes in the attainment status of Lake County as follows:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary Industrial Inorganic and Organic Chemicals Manufacturing Plant.

Authorized Individual:	Environmental Manager or Environmental Coordinator
Source Address:	3100 Michigan Street, Hammond, Indiana 46323
Mailing Address:	1414 Field Street, P.O. Box 6408 Hammond, Indiana 46325-6408
General Source Phone:	(219) 931-9360
SIC Code:	2819 – Industrial Inorganic Chemicals, nec 2869 – Industrial Organic Chemicals, nec
Source Location Status:	Lake County Attainment/Unclassifiable for PM10, SO ₂ , CO, NO ₂ and Lead; Primary Nonattainment for SO₂ and PM2.5 and 8-hour ozone, Nonattainment for ozone under the 8-hour standard, and Nonattainment for ozone under the 1-hour standard
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source under PSD Rules; and Minor Source under Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

5. Upon further review, IDEM and HDEM have 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 have been removed from each applicable D Section in the permit. In addition, the requirement to keep records of the inspections has been removed from each applicable D Section in the permit.

On pages 40 and 41 of 94, in Section D.1:

~~D.1.9 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack IDs S-6, S-7, & S-8 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

~~D.1.409 Broken or Failed Bag Detection~~

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

~~D.1.140 Record Keeping Requirements~~

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the Stack IDs S-6, S-7, & S-8 stack exhaust once per day.

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- ~~(e) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9 and the dates the vents are redirected.~~
- ~~(dc)~~ To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

On pages 44 and 45 of 94, in Section D.2:

~~D.2.9 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-12 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

D.2.409 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.2.140 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-12 stack exhaust once per day.
- (b) To document compliance with Condition D.2.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- ~~(c) To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9 and the dates the vents are redirected.~~
- (dc) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

On pages 47 and 48 of 94, in Section D.3:

~~D.3.8 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-14 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

D.3.98 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been

repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.3.409 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-14 stack exhaust once per day.
- (b) To document compliance with Condition D.3.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- ~~(c) To document compliance with Condition D.3.8, the Permittee shall maintain records of the results of the inspections required under Condition D.3.8 and the dates the vents are redirected.~~
- (dc) To document compliance with Condition D.3.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

On pages 51 and 52 of 94, in Section D.4:

~~D.4.9 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-15 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

D.4.409 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.4.140 Record Keeping Requirements

- (a) To document compliance with Condition D.4.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-15 stack exhaust once per day.
- (b) To document compliance with Condition D.4.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- ~~(c) To document compliance with Condition D.4.9, the Permittee shall maintain records of the results of the inspections required under Condition D.4.9 and the dates the vents are redirected.~~
- (dc) To document compliance with Condition D.4.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

On pages 55 and 56 of 94, in Section D.5:

~~D.5.9 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-17 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

D.5.409 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM,

OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.5.140 Record Keeping Requirements

- (a) To document compliance with Condition D.5.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-17 stack exhaust once per day.
- (b) To document compliance with Condition D.5.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- ~~(c) To document compliance with Condition D.5.9, the Permittee shall maintain records of the results of the inspections required under Condition D.5.9 and the dates the vents are redirected.~~
- (dc) To document compliance with Condition D.5.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

On pages 60 and 61 of 94, in Section D.7:

~~D.7.8 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-4 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

D.7.98 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall

include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.7.409 Record Keeping Requirements

- (a) To document compliance with Condition D.7.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-4 stack exhaust once per day.
- (b) To document compliance with Condition D.7.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- ~~(c) To document compliance with Condition D.7.8, the Permittee shall maintain records of the results of the inspections required under Condition D.7.8 and the dates the vents are redirected.~~
- (dc) To document compliance with Condition D.7.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

On pages 63 and 64 of 94, in Section D.8:

~~D.8.8 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-5 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

D.8.98 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately

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

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.8.409 Record Keeping Requirements

- (a) To document compliance with Condition D.8.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-5 stack exhaust once per day.
- (b) To document compliance with Condition D.8.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- ~~(c) To document compliance with Condition D.8.8, the Permittee shall maintain records of the results of the inspections required under Condition D.8.8 and the dates the vents are redirected.~~
- (dc) To document compliance with Condition D.8.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

On pages 68 and 69 of 94, in Section D.10:

~~D.10.9 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-21 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

D.10.409 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.10.140 Record Keeping Requirements

- (a) To document compliance with Condition D.10.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-21 stack exhaust once per day.
- (b) To document compliance with Condition D.10.8, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- ~~(c) To document compliance with Condition D.10.9, the Permittee shall maintain records of the results of the inspections required under Condition D.10.9 and the dates the vents are redirected.~~
- (dc) To document compliance with Condition D.10.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

On pages 73 and 74 of 94, in Section D.12:

~~D.12.8 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter~~

~~controlling the process associated with Stack ID S-1 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

D.12.98 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.12.409 Record Keeping Requirements

- (a) To document compliance with Condition D.12.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-1 stack exhaust once per day.
- (b) To document compliance with Condition D.12.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- ~~(c) To document compliance with Condition D.12.8, the Permittee shall maintain records of the results of the inspections required under Condition D.12.8 and the dates the vents are redirected.~~
- (dc) To document compliance with Condition D.12.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

On pages 76 and 77 of 94, in Section D.13:

~~D.13.8 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-2 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

~~D.13.98 Broken or Failed Bag Detection~~

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

~~D.13.409 Record Keeping Requirements~~

- (a) To document compliance with Condition D.13.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-2 stack exhaust once per day.
- (b) To document compliance with Condition D.13.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- ~~(c) To document compliance with Condition D.13.8, the Permittee shall maintain records of the results of the inspections required under Condition D.13.8 and the dates the vents are redirected.~~
- (dc) To document compliance with Condition D.13.3, the Permittee shall maintain records of

any additional inspections prescribed by the Preventive Maintenance Plan.

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

On pages 80 and 81 of 94, in Section D.14:

~~D.14.8 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack IDs S-9, S-10, & S-11 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

~~D.14.98 Broken or Failed Bag Detection~~

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

~~D.14.109~~ Record Keeping Requirements

- (a) To document compliance with Condition D.14.6, the Permittee shall maintain records of visible emission notations of the Stack IDs S-9, S-10, & S-11 stack exhaust once per day.
- (b) To document compliance with Condition D.14.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.

- ~~(c)~~ To document compliance with Condition D.14.8, the Permittee shall maintain records of the results of the inspections required under Condition D.14.8 and the dates the vents are redirected.
- (dc) To document compliance with Condition D.14.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

On pages 83 and 84 of 94, in Section D.15:

~~D.15.8 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-13 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

D.15.98 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.15.409 Record Keeping Requirements

- (a) To document compliance with Condition D.15.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-13 stack exhaust once per day.

- (b) To document compliance with Condition D.15.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- ~~(c) To document compliance with Condition D.15.8, the Permittee shall maintain records of the results of the inspections required under Condition D.15.8 and the dates the vents are redirected.~~
- ~~(d)~~ (dc) To document compliance with Condition D.15.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

On pages 86 and 87 of 94, in Section D.16:

~~D.16.8 Baghouse and HEPA Filter Inspections~~

~~An inspection shall be performed on an as needed basis of all bags and the HEPA filter controlling the process associated with Stack ID S-16 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

~~D.16.98 Broken or Failed Bag Detection~~

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired and replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

D.16.409 Record Keeping Requirements

- (a) To document compliance with Condition D.16.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-16 stack exhaust once per day.
- (b) To document compliance with Condition D.16.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- ~~(c) To document compliance with Condition D.16.8, the Permittee shall maintain records of the results of the inspections required under Condition D.16.8 and the dates the vents are redirected.~~
- (dc) To document compliance with Condition D.16.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

Conclusion

The operation of this Dryer No. 5, Stack ID S-22 shall be subject to the conditions of this FESOP Minor Permit Revision No. 089-23378-00218.

Appendix A: Emission Calculations

Plant ID: 00218

Company Name: Halstab Division of Hammond Group, Inc. (HGI)

Address: 3100 Michigan Street, Hammond, Indiana 46323

Calculations By: Debra Malone

NO. OF POINTS: 1
 NO. OF SEGMENTS: 4

Total: Dryer No. 5 System

POLLUTANT	POTENTIAL TO EMIT (PTE)						PERMIT LIMIT		2006 ACTUAL	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE CONTROLS	AFTER CONTROLS
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	1.1415	27.3968	4.9999	0.0016	0.0071	0.0002	0.002	0.007	0.0000	0.0000
PM10	1.1417	27.4011	5.0007	0.0016	0.0071	0.0002	0.002	0.007	0.0000	0.0000
SOx	0.0003	0.0072	0.0013	0.0003	0.0013	N/A	N/A	N/A	0.0000	0.0000
NOx	0.0500	1.2000	0.2190	0.0500	0.2190	N/A	N/A	N/A	0.0000	0.0000
VOC	0.0027	0.0636	0.0116	0.0027	0.0116	N/A	N/A	N/A	0.0000	0.0000
CO	0.0100	0.2400	0.0438	0.0100	0.0438	N/A	N/A	N/A	0.0000	0.0000
LEAD	0.9444	22.6653	4.1364	0.0001	0.0004	N/A	0.0001	0.0004	0.0000	0.0000

* Under Natural Gas Combustion.

Hammond Air Quality Control Ordinance No. 3522

Lead emission factors were derived from compliance tests performed on similar units.
 PM emission factors were based on the lead emission factors divided by the lead content.
 PM10 emission factors were set equal to the PM emission factors.

Dryer No. 5 EFs were derived from Compliance Test for Stack ID S-4: No. 1 Dryer performed on 6/3/98.
 Screen Mill EFs were derived from similar kind of mill, HLP Screen Mill (52-13) based on compliance test performed on 11/17/99.
 Packing EF were derived from Compliance Test for Stack ID S-17: Bulk/Bag Packing performed on 10/6/98.