



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 6, 2007

RE: Valbruna Slater Stainless, Inc / 003-23815-00011

FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot 03/23/06



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Valbruna Slater Stainless, Inc  
2400 Taylor Street West  
Fort Wayne, Indiana 46802**

(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. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.

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.

Operation Permit No.: F003-23815-00011	
Issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY.....</b>	<b>5</b>
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
<b>B. GENERAL CONDITIONS .....</b>	<b>8</b>
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.17 Permit Renewal [326 IAC 2-8-3(h)]	
B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20 Source Modification Requirement [326 IAC 2-8-11.1]	
B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS .....</b>	<b>17</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Stack Height [326 IAC 1-7]	
C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.9 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.10 Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]  
[326 IAC 2-8-5(1)]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

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

- C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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

- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

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

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23**

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

- D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
- D.1.2 Part 70 Minor Limit [326 IAC 2-8-4]

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

- D.1.3 Record Keeping Requirements
- D.1.4 Reporting Requirements

**D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 25**

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

- D.2.1 PSD Minor Limits [326 IAC 2-2]
- D.2.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

**Compliance Determination Requirements**

- D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
- D.2.4 Particulate matter (PM)

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

- D.2.5 Visible Emissions Notations
- D.2.6 Parametric Monitoring
- D.2.7 Broken or Failed Bag Detection

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

- D.2.8 Record Keeping Requirements

**D.3. EMISSIONS UNIT OPERATION CONDITIONS..... 28**

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

- D.3.1 PSD Minor Limits [326 IAC 2-2]
- D.3.2 Part 70 Minor Limit [326 IAC 2-8-4]
- D.3.3 Particulate Emission Limitation for Manufacturing Processes [326 IAC 6-3-2]

**Compliance Determination Requirements**

- D.3.4 Particulate Matter
- D.3.5 Nitrogen Oxide (NOx)
- D.3.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
- D.3.7 Testing [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

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

- D.3.8 Broken or Failed Bag Detection
- D.3.9 Monitoring of Surface Tension of Each Passivation Bath

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

- D.3.10 Record Keeping Requirements

**D.4. EMISSIONS UNIT OPERATION CONDITIONS (Insignificant Activities) ..... 31**

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

- D.4.1 Particulate Emission Limitation for Source of Indirect Heating [326 IAC 6-3-2]
- D.4.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]
- D.4.3 General Provisions relating to New Source Performance Standard [326 IAC 12-1] [40 CFR 60, Subpart A]
- D.4.4 Standard of Performance for Small industrial-Commercial Institutional Steam Generating Units [326 IAC 12-1] [40 CFR 60 Subpart Dc]

**D.5. EMISSIONS UNIT OPERATION CONDITIONS ..... 36**

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

- D.5.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
- D.5.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

**Compliance Determination Requirements**

- D.5.3 Particulate Matter

Certification Form ..... 38  
Emergency Occurrence Form ..... 39  
Natural Gas Fired Boiler Certification ..... 41  
Quarterly Report Form (Passivation System) ..... 42  
Quarterly Report Form (Sourcewide NOx)..... 43  
Quarterly Deviation and Compliance Monitoring Report Form ..... 44

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the

Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

---

The Permittee owns and operates a stationary Stainless Steel Products Processing Plant.

Source Address:	2400 Taylor Street West, Fort Wayne, Indiana 46802
Mailing Address:	P.O. Box 630, Fort Wayne, IN 46801
General Source Phone Number:	260-434-2955
SIC Code:	3312
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rule Minor Source, Section 112 of the Clean Air Act Not 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:

#### (a) Primary Mill

- (1) One (1) ingot grinding operation (ID# B1), constructed in 1988, with a maximum capacity of 13.163 tons per hour, controlled by a voluntary dust collection house ID# E4, and exhausting through vent E4;
- (2) Eight (8) natural gas-fired preheat charge furnaces (ID#s B2a through B2h), constructed in 1968, with a maximum combined preheat capacity of 10.27 tons per hour, with a maximum heat input capacity of 31.6 million Btu per hour, each, emissions uncontrolled and exhausting inside the building; and
- (3) Four (4) natural gas-fired annealing furnaces (ID#s B4a through B4d), constructed in 1968, with a maximum combined annealing capacity of 10.27 tons per hour, with a maximum heat input capacity of 13.0 million Btu per hour, each, emission uncontrolled and exhausting inside the building.

#### (b) Continuous Bar Mill and Annealing

One (1) natural gas-fired annealing furnace (ID# D3), constructed in 1990, with a maximum heat input capacity of 13.9 million Btu per hour, emissions uncontrolled, and exhausting inside the building.

#### (c) Billet Conditioning

One (1) billet shot blasting operation (ID# C4), constructed in 1973, with a maximum processing capacity of 4.0 tons of billets per hour, controlled by a baghouse (ID# E9), and exhausting through stack E9.

(d) cold Finishing

- (1) One (1) passivation system (ID# E3), constructed in 1993, with a maximum capacity of 4.0 tons of stainless steel bars per hour, voluntarily controlled by a mist eliminator (ID# E12), and exhausting through stack E12;
- (2) One (1) old bar shot blasting operation (ID# E6), constructed in 1974, with two blasting stations, with a total maximum capacity of 1.83 tons of stainless steel bar per hour, controlled by a baghouse (ID# E15), and exhausting inside the building; and
- (3) One (1) #1 shot blasting operation (ID# E7) constructed in 1980, with a maximum capacity of 1.83 tons of stainless steel bar per hour, controlled by a baghouse (ID# E16), and exhausting inside the building.

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)][326 IAC 2-8-3(c)(3)(1)]:

(a) Billet Conditioning

- (1) One (1) dry grinding operation (ID# C3), constructed in 1989, with a maximum capacity of 1.6 tons per hour, emissions uncontrolled and exhausting through vent E6;
- (2) One (1) CMI grinder (ID# C5), constructed in 1985, with a maximum capacity of 1.60 tons per hour, controlled by a voluntary baghouse (ID# E8a), and exhausting inside the building.

(b) Continuous Bar Mill and Annealing

One (1) CBM cut-off saw (ID# D2), constructed in 1990, with a maximum processing capacity of 5.14 tons of bars per hour, controlled by a voluntary baghouse (ID# E10), and exhausting through stack E10;

- (c) One (1) natural gas-fired boiler, identified as # 2, constructed in 1979, with a maximum heat input capacity of 3.5 million Btu per hour, exhausting through stack E15 [326 IAC 6-2-3];
- (d) One (1) natural gas-fired boiler, identified as # 3, constructed in 1990, with a maximum heat input capacity of 8.0 million Btu per hour, exhausting through stack E16 [326 IAC 6-2-4];
- (e) One (1) natural gas-fired boiler, identified as CDC boiler, constructed in 1998, with a maximum heat input capacity of 10.0 million Btu per hour, exhausting through CDC boiler stacks. [326 IAC 6-2-4];
- (f) The sawing operation is attached to a baghouse (ID# CDC-BH) that has a design maximum outlet grain loading of 0.003 gr/dscf and a gas flow rate of 2,942 actual cubic feet of air per minute [326 IAC 6-3-2]; and
- (g) The oxidizing operation uses nitric acid solution to oxidize the surface of stainless steel bars. It is designed with water curtains as an integral part of the process to recover and neutralize nitric acid fumes and to prevent cross contamination with the intermediate and final alkaline cleaning operations [326 IAC 6-3-2].

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) to renew a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

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

---

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

### B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

---

- (a) This permit, F003-23815-00011, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

---

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

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

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

---

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

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

---

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

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

---

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

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

---

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### B.8 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.9 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 no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

---

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

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

---

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
  - (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:
    - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
    - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
      - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
      - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

---

- (a) All terms and conditions of permits established prior to F003-23815-00011 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,

(2) revised, or

(3) deleted

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

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

---

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

---

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

---

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

---

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "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.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

---

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).
- (b) **Emission Trades [326 IAC 2-8-15(c)]**  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Source Modification Requirement [326 IAC 2-8-11.1]**

---

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][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, U.S. EPA, or an authorized representative to perform the following:

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

---

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

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

---

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

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

---

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

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

---

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

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

---

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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

---

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

---

- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

---

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

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

### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

---

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

---

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

### **C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

---

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

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

---

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

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

##### C.15 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.16 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 twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

##### C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

**C.18 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 an "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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, 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.19 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 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

(a) Primary Mill

- (1) One (1) ingot grinding operation (ID# B1), constructed in 1988, with a maximum capacity of 13.163 tons per hour, controlled by a voluntary dust collection house ID# E4, and exhausting through vent E4;
- (2) Eight (8) natural gas-fired preheat charge furnaces (ID#s B2a through B2h), constructed in 1968, with a maximum combined preheat capacity of 10.27 tons per hour, with a maximum heat input capacity of 31.6 million Btu per hour, each, emissions uncontrolled and exhausting inside the building; and
- (3) Four (4) natural gas-fired annealing furnaces (ID#s B4a through B4d), constructed in 1968, with a maximum combined annealing capacity of 10.27 tons per hour, with a maximum heat input capacity of 13.0 million Btu per hour, each, emission uncontrolled and exhausting inside the building.

(b) Continuous Bar Mill and Annealing

- (1) One (1) natural gas-fired annealing furnace (ID# D3), constructed in 1990, with a maximum heat input capacity of 13.9 million Btu per hour, emissions uncontrolled, and exhausting inside the building.

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

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

#### D.1.1 Particulate Emissions Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (e), (Particulate Emissions Limitations for Manufacturing Processes), the allowable particulate matter (PM) emissions from the Ingot grinding shall not exceed 23.05 pounds per hour emission rate established by the equation:

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

$$E = 4.10 P^{0.67}$$

Where:

P = process weight rate in tons per hour (10.27 tons/hour); and  
E = rate of emission in pounds per hour.

**D.1.2 Part 70 Minor Limits [326 IAC 2-8-4]**

---

The natural gas usage of the eight (8) preheat charge furnaces, four (4) annealing furnaces, one (1) annealing furnace and the insignificant activities shall be less than 1,500 million cubic feet of natural gas per twelve (12) consecutive month period, with compliance determined at the end of each month, and the NO<sub>x</sub> and CO emissions shall not exceed 100 and 84.0 pounds per million cubic feet of natural gas, respectively.

Compliance with the above limits and Condition D.3.2, will limit the source wide NO<sub>x</sub> and CO emissions to less than 100 tons per twelve (12) consecutive month period, each, and will render 326 IAC 2-7 (Part 70 ) not applicable to the source.

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

**D.1.3 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain a log of monthly natural gas usage.
  
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.4 Reporting Requirements**

---

A quarterly summary of the natural gas usage to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

#### (b) Billet Conditioning

- (1) One (1) billet shot blasting operation (ID# C4), constructed in 1973, with a maximum processing capacity of 4.0 tons of billets per hour, controlled by a baghouse (ID# E9), and exhausting through stack E9.

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

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

#### D.2.1 PSD Minor Limit [326 IAC 2-2]

The PM emissions from the billet shot blasting operation, shall be limited to less than 10.4 pounds per hour.

Compliance with the above limit in combination with Condition D.3.1 and the potential PM emissions from the eight (8) pre-heat charger furnaces, four (4) annealing furnaces, one (1) annealing furnace, and the insignificant activities will limit sourcewide PM emissions to less than 250 tons per twelve (12) consecutive month period, and will render 326 IAC 2-2 (PSD ) not applicable to this source.

#### D.2.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter (PM) emissions from the billet shot blasting operation, shall not exceed the emission limit shown in the table below:

Operation	Process Weight (tons/hr)	Allowable Limits (lbs/hr)
Billet Shot Blasting (C4)	4.0	10.4

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

$$E = 4.10 \times P^{0.67}$$

Where:

P = process weight in tons/hr; and  
E = rate of emission in pounds per hour.

### Compliance Determination Requirements

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

#### D.2.4 Particulate Matter (PM)

---

- (a) In order to comply with Conditions D.2.1 and D.2.2, the baghouse for PM control shall be in operation at all times when the billet shot blasting process is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.2.5 Visible Emissions Notations

---

- (a) Visible emission notations of the billet shot blasting stack exhaust (stack E9) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.2.6 Parametric Monitoring

---

The Permittee shall record the pressure drop across the billet shot blasting baghouse used in conjunction with the billet shot blasting operations at least once per day when the billet shot blasting operations are in operation. When for any one reading, the pressure drop across the baghouse are outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions and Exceedances . A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances shall be considered deviation from the permit.

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

#### D.2.7 Broken or Failed Bag Detection

---

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

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

#### **D.2.8 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain daily records of the visible emission notations of the billet shot blasting operations stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.2.6 the Permittee shall maintain the daily records of the pressure drop across the baghouse controlling the billet shot blasting operations. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

#### (d) Cold Finishing

- (1) One (1) passivation system (ID# E3), constructed in 1993, with a maximum capacity of 4.0 tons of stainless steel bars per hour, controlled by a mist eliminator (ID# E12), and exhausting through stack E12;
- (2) One (1) old bar shot blasting operation (ID# E6), constructed in 1974, with two blasting stations, with a total maximum capacity of 1.83 tons of stainless steel bar per hour, controlled by a baghouse (ID# E15), and exhausting inside the building; and
- (3) One (1) #1 shot blasting operation (ID# E7) constructed in 1980, with a maximum capacity of 1.83 tons of stainless steel bar per hour, controlled by a baghouse (ID# E16), and exhausting inside the building.

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

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

#### D.3.1 PSD Minor Limit [326 IAC 2-2]

The PM emissions from the old bar shot blasting and #1 shot blasting operations, shall be limited to less than 6.15 pounds per hour, each.

Compliance with the above limits in combination with Condition D.2.1 and the potential PM emissions from the passivation system will limit sourcewide PM emissions to less than 250 tons per twelve (12) consecutive month period, and will render 326 IAC 2-2 (PSD) not applicable to this source.

#### D.3.2 Part 70 Minor Limit [326 IAC 2-8-4]

The passivation production for the passivation system shall be less than 35,000 tons of steel per 12 consecutive month period, with compliance determined at the end of each month, and the NOx emissions from the passivation system shall not exceed 1.23 pounds per ton of metal.

Compliance with the above limits and Condition D.1.2, will limit the source wide NOx emissions to less than 100 tons per twelve (12) consecutive month period, and will render 326 IAC 2-7 (Part 70) not applicable to the source.

**D.3.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]**

---

Pursuant to 326 IAC 6-3-2(e), (Particulate Emissions Limitations for Manufacturing Processes), the allowable particulate matter (PM) emissions from the passivation system, old bar shot blasting operation and #1 shot blasting operation shall not exceed the emission limits shown in the table below:

<b>Operation</b>	<b>Process Weight (tons/hr)</b>	<b>Allowable Limits (lbs/hr)</b>
Passivation System	4.0	10.4
Old Bar Shot Blasting	1.83	6.15
#1 Shot Blasting	1.83	6.15

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

$$E = 4.10 \times P^{0.67}$$

Where:

P = process weight in tons/hr; and  
E = rate of emission in pounds per hour.

**Compliance Determination Requirements**

**D.3.4 Particulate Matter (PM)**

---

- (a) In order to comply with Conditions D.3.1 and D.3.3, the baghouses for PM control shall be in operation at all times when the old bar shot blasting and #1 shot blasting operation are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**D.3.5 Nitrogen Oxides (NOx)**

---

The chemical suppression blanket for NOx emissions and the mist eliminator shall be in operation at all times the passivation system is in operation.

**D.3.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

---

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

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

---

Within sixty (60) days after the restart of the passivation system, the Permittee shall perform NO<sub>x</sub> testing on the passivation system utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.

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

**D.3.8 Broken or Failed Bag Detection**

---

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

**D.3.9 Monitoring of Surface Tension of Each Passivation Bath**

---

The Permittee shall maintain the surface tension of the passivation bath such that the surface tension does not exceed 24 dynes per centimeter. The Permittee shall take a reasonable response step if the surface tension is greater than 24 dynes per centimeter for any one reading in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C -Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

**D.3.10 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.3.9, the Permittee shall maintain daily records of the surface tension of the passivation bath. The Permittee shall include in its daily record when the record of the surface tension of the passivation bath is not taken and the reason for the lack of surface tension records, (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

## SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Insignificant Activities

- (a) One (1) natural gas-fired boiler, identified as # 2, constructed in 1979, with a maximum heat input capacity of 3.5 million Btu per hour, exhausting through stack E15 [326 IAC 6-2-3];
- (b) One (1) natural gas-fired boiler, identified as # 3, constructed in 1990, with a maximum heat input capacity of 8.0 million Btu per hour, exhausting through stack E16 [326 IAC 6-2-4]; and
- (c) One (1) natural gas-fired boiler, identified as CDC boiler, constructed in 1998, with a maximum heat input capacity of 10.0 million Btu per hour, exhausting through CDC boiler stacks [326 IAC 6-2-4].

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

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

#### D.4.1 Particulate Matter (Particulate Emission Limitations for Sources of Indirect Heating) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e), particulate matter (PM) emissions from Boiler #2 shall not exceed 0.6 pounds of PM per million British thermal units.

#### D.4.2 Particulate Matter (Particulate Emission Limitations for Sources of Indirect Heating) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, particulate matter (PM) emissions from the Boiler #3 and the CDC Boiler shall not exceed 0.58 and 0.49 pounds of PM per million British thermal units, respectively.

The limits were calculated using the equation below:

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

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and

Q = Total source maximum operating capacity (MMBtu/hr) = 11.35 MMBtu/hr for boiler # 3 and 21.35 MMBtu/hr for CDC boiler.

#### D.4.3 General Provision Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the CDC Boiler except as otherwise specified in 40 CFR Part 60, Subpart Dc.
- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue,  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

D.4.4 Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Units  
[326 IAC 12-1] [40 CFR 60, Subpart Dc]

---

Pursuant to 40 CFR 60 Subpart Dc, the Permittee shall comply with the provisions of Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Units for the CDC Boiler as specified as follows:

**§ 60.40c Applicability and delegation of authority.**

(a) Except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

(b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

Facility covered by an EPA approved State or Federal section 111(d)/129 plan implementing subpart BBBB of this part is not covered by this subpart.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 71 FR 9884, Feb. 27, 2006]

**§ 60.41c Definitions.**

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

*Annual capacity factor* means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility during a period of 12 consecutive calendar months.

*Coal* means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society of Testing and Materials in ASTM D388-77, 90, 91, 95, or 98a, Standard Specification for Classification of Coals by Rank (IBR—see §60.17), coal refuse, and petroleum coke. Coal-derived synthetic fuels derived from coal for the purposes of creating useful heat, including but not limited to solvent refined coal, gasified coal, coal-oil mixtures, and coal-water mixtures, are also included in this definition for the purposes of this subpart.

*Coal refuse* means any by-product of coal mining or coal cleaning operations with an ash content greater than 50 percent (by weight) and a heating value less than 13,900 kilojoules per kilogram (kJ/kg) (6,000 Btu per pound (Btu/lb) on a dry basis.

*Cogeneration steam generating unit* means a steam generating unit that simultaneously produces both electrical (or mechanical) and thermal energy from the same primary energy source.

*Combined cycle system* means a system in which a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

*Combustion research* means the experimental firing of any fuel or combination of fuels in a steam generating unit for the purpose of conducting research and development of more efficient combustion or more effective prevention or control of air pollutant emissions from combustion, provided that, during these periods of research and development, the heat generated is not used for any purpose other than preheating combustion air for use by that steam generating unit (i.e., the heat generated is released to the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

*Conventional technology* means wet flue gas desulfurization technology, dry flue gas desulfurization technology, atmospheric fluidized bed combustion technology, and oil hydrodesulfurization technology.

*Distillate oil* means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, “Standard Specification for Fuel Oils” (incorporated by reference—see §60.17).

*Dry flue gas desulfurization technology* means a sulfur dioxide (SO<sub>2</sub>) control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a dry powder material. This definition includes devices where the dry powder material is subsequently converted to another form. Alkaline reagents used in dry flue gas desulfurization systems include, but are not limited to, lime and sodium compounds.

*Duct burner* means a device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

*Emerging technology* means any SO<sub>2</sub> control system that is not defined as a conventional technology under this section, and for which the owner or operator of the affected facility has received approval from the Administrator to operate as an emerging technology under §60.48c(a)(4).

*Federally enforceable* means all limitations and conditions that are enforceable by the Administrator, including the requirements of 40 CFR Parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 40 CFR 51.24.

*Fluidized bed combustion technology* means a device wherein fuel is distributed onto a bed (or series of beds) of limestone aggregate (or other sorbent materials) for combustion; and these materials are forced upward in the device by the flow of combustion air and the gaseous products of combustion. Fluidized bed combustion technology includes, but is not limited to, bubbling bed units and circulating bed units.

*Fuel pretreatment* means a process that removes a portion of the sulfur in a fuel before combustion of the fuel in a steam generating unit.

*Heat input* means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

*Heat transfer medium* means any material that is used to transfer heat from one point to another point.

*Maximum design heat input capacity* means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

*Natural gas* means (1) a naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane, or (2) liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835–86, 87, 91, or 97, "Standard Specification for Liquefied Petroleum Gases" (incorporated by reference—see §60.17).

*Noncontinental area* means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, or the Northern Mariana Islands.

*Oil* means crude oil or petroleum, or a liquid fuel derived from crude oil or petroleum, including distillate oil and residual oil.

*Potential sulfur dioxide emission rate* means the theoretical SO<sub>2</sub> emissions (nanograms per joule [ng/J], or pounds per million Btu [lb/million Btu] heat input) that would result from combusting fuel in an uncleaned state and without using emission control systems.

*Process heater* means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.

*Residual oil* means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, "Standard Specification for Fuel Oils" (incorporated by reference—see §60.17).

*Steam generating unit* means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

*Steam generating unit operating day* means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

*Wet flue gas desulfurization technology* means an SO<sub>2</sub> control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a liquid material. This definition includes devices where the

liquid material is subsequently converted to another form. Alkaline reagents used in wet flue gas desulfurization systems include, but are not limited to, lime, limestone, and sodium compounds.

*Wet scrubber system* means any emission control device that mixes an aqueous stream or slurry with the exhaust gases from a steam generating unit to control emissions of particulate matter (PM) or SO<sub>2</sub>.

*Wood* means wood, wood residue, bark, or any derivative fuel or residue thereof, in any form, including but not limited to sawdust, sanderdust, wood chips, scraps, slabs, millings, shavings, and processed pellets made from wood or other forest residues.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 65 FR 61752, Oct. 17, 2000; 71 FR 9884, Feb. 27, 2006]

**§ 60.48c Reporting and recordkeeping requirements.**

(a) The Permittee of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(g) The permittee of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The Permittee of an affected facility that only burns very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month.

(i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

(j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

[55 FR 37683, Sept. 12, 1990, as amended at 64 FR 7465, Feb. 12, 1999; 65 FR 61753, Oct. 17, 2000; 71 FR 9886, Feb. 27, 2006]

## SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Insignificant Activities

- (a) Billet Conditioning
  - (1) One (1) dry grinding operation (ID# C3), constructed in 1989, with a maximum capacity of 1.6 tons per hour, emissions uncontrolled and exhausting through vent E6; and
  - (2) One (1) CMI grinder (ID# C5), constructed in 1985, with a maximum capacity of 1.60 tons per hour, controlled by a voluntary baghouse (ID# E8a), and exhausting inside the building.
- (b) Continuous Bar Mill and Annealing

One (1) CBM cut-off saw (ID# D2), constructed in 1990, with a maximum processing capacity of 5.14 tons of bars per hour, controlled by a voluntary baghouse (ID# E10), and exhausting through stack E10;
- (c) The sawing operation is attached to a baghouse (ID# CDC-BH) that has a design maximum outlet grain loading of 0.003 gr/dscf and a gas flow rate of 2,942 actual cubic feet of air per minute [326 IAC 6-3-2]; and
- (d) The oxidizing operation uses nitric acid solution to oxidize the surface of stainless steel bars. It is designed with water curtains as an integral part of the process to recover and neutralize nitric acid fumes and to prevent cross contamination with the intermediate and final alkaline cleaning operations [326 IAC 6-3-2].

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

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

#### D.5.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the sawing operation, and oxidizing operation shall not exceed the pounds per hour emission rate established by the equation:

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

$$E = 4.10 \times P^{0.67}$$

Where:

P = process weight in tons/hr and  
E = rate of emission in pounds per hour.

#### D.5.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), (Particulate Emissions Limitations for Manufacturing Processes), the allowable particulate matter (PM) emissions from the dry grinding operation, CMI grinder and CBM cut-off saw shall not exceed the emission limits shown in the table below:

Operation	P (tons/hr)	Allowable Limits (lbs/hr)
Dry grinding	1.6	5.6
CMI grinder	1.6	5.6
CBM cut-off saw	5.14	12.3

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

$$E = 4.10 \times P^{0.67}$$

Where:

P = process weight in tons/hr; and

E = rate of emission in pounds per hour.

### Compliance Determination Requirements

#### D.5.3 Particulate Matter (PM)

---

The baghouse for PM control shall be in operation and control emissions from the CMI grinder, CBM cut-off saw and sawing operation at all times that the CMI grinder, CBM cut-off saw sawing operation are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

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

Source Name: Valbruna Slater Stainless, Inc  
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
Mailing Address: P.O. Box 630, Fort Wayne, IN 46801  
FESOP Permit No.: F003-23815-00011

**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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

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

Source Name: Valbruna Slater Stainless, Inc  
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
Mailing Address: P.O. Box 630, Fort Wayne, IN 46801  
FESOP Permit No.: F003-23815-00011

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

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

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

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_

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

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

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

A certification is not required for this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
SEMI- ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Valbruna Slater Stainless, Inc  
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
Mailing Address: P.O. Box 630, Fort Wayne, IN 46801  
FESOP Permit No.: F003-23815-00011

<input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____
--

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: _____

Attach a signed certification to complete this report.

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

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

**FESOP Quarterly Report**

Source Name: Valbruna Slater Stainless, Inc  
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
Mailing Address: P.O. Box 630, Fort Wayne, IN 46801  
FESOP Permit No.: F003-23815-00011  
Facility: Cold Finishing  
Parameter: Passivation System  
Limit: Less than 35,000 tons of steel per twelve consecutive month period.

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

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

**FESOP Quarterly Report**

Source Name: Valbruna Slater Stainless, Inc  
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
Mailing Address: P.O. Box 630, Fort Wayne, IN 46801  
FESOP Permit No.: F003-23815-00011  
Facility: Sourcewide  
Parameter: Annual Natural Gas Usage  
Limit: Less than 1500 million cubic feet (MMcf) per twelve consecutive month period.

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Valbruna Slater Stainless, Inc  
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
Mailing Address: P.O. Box 630, Fort Wayne, IN 46801  
FESOP Permit No.: F003-23815-00011

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

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked <input type="radio"/> No deviations occurred this reporting period <input type="radio"/>.</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

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

Form Completed by: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

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

**Addendum to the Technical Support Document  
for Federally Enforceable State Operating Permit (FESOP) Renewal**

**Source Background and Description**

Source Name:	Valbruna Slater Stainless, Inc
Source Location:	2400 Taylor Street, Fort Wayne, IN 46802
County:	Allen
SIC Code:	3312
Permit Renewal No.:	F003-23815-00011
Permit Reviewer:	Josiah Balogun

On July 31, 2007, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Valbruna Slater Stainless, Inc had applied for a Federally Enforceable State Operating Permit (FESOP) renewal to continue to operate a Stainless Steel Product processing Plant. The notice also stated that OAQ proposed to issue a FESOP renewal for this operation and provided information on how the public could review the proposed FESOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP renewal should be issued as proposed.

**Comment 1 Page 3 of Appendix A of the Technical Support Document.**

The source requested IDEM, OAQ to change Ingot Grinding emission factors from 0.01 lb/ton for PM and 0.0045 lb/ton for PM<sub>10</sub> to 0.99 lb/ton for PM and PM<sub>10</sub>.

**Response 1:** The emission factors were based on emission factors from the Source Classification Codes (SCC # 3-04-003-60)

The emission factors have been changed accordingly.

Process	Rate (tons ingot/hr)	Pollutant	Ef (lb/ton produced)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
Ingot Grinding	13.163	PM	<del>0.01</del> 0.99	<del>0.58</del> 57.08	<del>0.14</del> 14.27	Dust	75.00%
		PM-10	<del>0.0045</del> 0.99	<del>0.06</del> 57.08	<del>0.014</del> 14.27	Collection	
		SO2	0.00	0.00	0.00	House	
		NOx	0.00	0.00	0.00		
		VOC	0.00	0.00	0.00		
		CO	0.00	0.00	0.00		
		chromium	0.09	5.07	1.27		
		manganese	0.05	2.83	0.71		
		nickel	0.01	0.49	0.49		
		arsenic	0.00	0.00	0.00		
cadmium	0.00	0.00	0.00				
selenium	0.00	0.00	0.00				
Lead	0.00	0.00	0.13	0.13			

The PM and PM<sub>10</sub> emissions in the Unrestricted Potential Emissions table of TSD have been corrected.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflects the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Unrestricted Potential Emissions

Pollutant	tons/year
PM	<del>591.3</del> <b>647.8</b>
PM <sub>10</sub>	<del>86.1</del> <b>142.9</b>
SO <sub>2</sub>	0.8
VOC	8.2
CO	125.1
NO <sub>x</sub>	188.1
Lead	0.41

The Total PM and PM<sub>10</sub> and the Ingot grinding PM and PM<sub>10</sub> emissions in the Potential To Emit table of TSD have been corrected.

.....

Emission unit	Potential To Emit							
	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	VOC (tons/yr)	NOx (tons/yr)	CO (tons/yr)	Pb (tons/yr)	HAPs (tons/yr)
Ingot Grinding	<del>0.58</del> <b>14.27</b>	<del>0.26</del> <b>14.27</b>	0	0	0	0	0.13	2.13
Total PTE after Issuance	<del>420.3</del> <b>134.0</b>	<del>86.4</del> <b>100.1</b>	0.8	8.2	< 96.5	< 63.1	0.41	Single HAP <10 Combined HAPs < 25

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

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

**Source Background and Description**

<b>Source Name:</b>	Valbruna Slater Stainless, Inc
<b>Source Location:</b>	2400 Taylor Street West, Fort Wayne, IN 46802
<b>County:</b>	Allen
<b>SIC Code:</b>	3312
<b>Permit Renewal No.:</b>	F003-23815-00011
<b>Permit Reviewer:</b>	Josiah Balogun

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Valbruna Slater Stainless, Inc relating to the operation of a Stainless Steel Products Processing Plant.

**History**

On October 26, 2006, Valbruna Slater Stainless, Inc. submitted applications to the OAQ requesting to renew its operating permit. Valbruna Slater Stainless, Inc. was issued a Federally Enforceable State Operating Permit on July 26, 2002.

**Permitted Emission Units and Pollution Control Equipment**

- (a) Primary Mill
  - (1) One (1) ingot grinding operation (ID# B1), constructed in 1988 with a maximum capacity of 13.163 tons per hour, controlled by a voluntary dust collection house (dry filter), ID# E4, and exhausting through vent E4;
  - (2) Eight (8) natural gas-fired preheat charge furnaces (ID#s B2a through B2h), constructed in 1968, with a maximum combined preheat capacity of 10.27 tons per hour, with a maximum heat input capacity of 31.6 million Btu per hour, each and exhausting inside the building; and
  - (3) Four (4) natural gas-fired annealing furnaces (ID#s B4a through B4d), constructed in 1968, with a maximum combined annealing capacity of 10.27 tons per hour with a maximum heat input capacity of 13.0 million Btu per hour, each and exhausting inside the building.
- (b) Continuous Bar Mill and Annealing

One (1) natural gas-fired annealing furnace (ID# D3), constructed in 1990, with a maximum heat input capacity of 13.9 million Btu per hour, emissions uncontrolled and exhausting inside the building.
- (c) Billet Conditioning

One (1) billet shot blasting operation (ID# C4), constructed in 1973, with a maximum processing capacity of 4.0 tons of billets per hour, controlled by a baghouse (ID# E9), and exhausting through stack E9.

- (d) Cold Finishing
  - (1) One (1) passivation system (ID# E3), constructed in 1993, with a maximum capacity of 4.0 tons of stainless steel bars per hour, voluntarily controlled by a mist eliminator (ID# E12), and exhausting through stack E12;
  - (2) One (1) old bar shot blasting operation (ID# E6), constructed in 1974, with two blasting stations, with a total maximum capacity of 1.83 tons of stainless steel bar per hour, controlled by a baghouse (ID# E15), and exhausting inside the building; and
  - (3) One (1) #1 shot blasting operation (ID# E7), constructed in 1980, with a maximum capacity of 1.83 tons of stainless steel bar per hour, controlled by a baghouse (ID# E16), and exhausting inside the building.

#### **Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit**

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

#### **Emission Units and Pollution Control Equipment Removed From the Source**

No emission units and control was removed from the source.

#### **Insignificant Activities**

Insignificant Activities [326 IAC2-7-1(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) Billet Conditioning
  - (1) One (1) dry grinding operation (ID# C3), constructed in 1989, with a maximum capacity of 1.6 tons per hour, emissions uncontrolled and exhausting through vent E6; and
  - (2) One (1) CMI grinder (ID# C5), constructed in 1985, with a maximum capacity of 1.60 tons per hour, voluntarily controlled by a voluntary baghouse (ID# E8a), and exhausting inside the building.

#### **Continuous Bar Mill and Annealing**

- (b) One (1) CBM cut-off saw (ID# D2), constructed in 1990, with a maximum processing capacity of 5.14 tons of bars per hour, controlled by a voluntary baghouse (ID# E10), and exhausting through stack E10;
- (c) One (1) natural gas-fired boiler, identified as # 2, constructed in 1979, with a maximum heat input capacity of 3.5 million Btu per hour, exhausting through stack E15 [326 IAC 6-2-3];

- (d) One (1) natural gas-fired boiler, identified as # 3, constructed in 1990, with a maximum heat input capacity of 8.0 million Btu per hour, exhausting through stack E16 [326 IAC 6-2-4];
- (e) One (1) natural gas-fired boiler, identified as CDC boiler, constructed in 1998, with a maximum heat input capacity of 10.0 million Btu per hour, exhausting through CDC boiler stacks [326 IAC 6-2-4];
- (f) One (1) natural gas-fired heat treat furnace with heat input capacities less than or equal to 10 million Btu per hour;
- (g) combustion source flame safety purging start up;
- (h) One (1) gasoline transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (i) One (1) petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (j) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (k) refractory storage not requiring air pollution control equipment;
- (l) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (m) machining where an aqueous cutting coolant continuously floods the machining interface;
- (n) cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kilopascals; 15 mm Hg; or 0.3 psi measured at 38 C (100 F); or
  - (2) having a vapor pressure equal to or less than 0.7 kilopascal; 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) closed loop heating and cooling systems;
- (p) forced and induced draft noncontact cooling tower system not regulated under a NESHAP;
- (q) quenching operations used with heat treating processes;
- (r) replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (s) heat exchanger cleaning and repair;
- (t) process vessel degassing and cleaning to prepare for internal repairs;

- (u) paved roads and parking lots with public access;
- (v) equipment used to collect any material that might be released during a malfunction, process upset, or spill clean up, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (w) blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
- (x) furnaces used for melting metal other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume;
- (y) a laboratory as defined in 326 IAC 2-7-1(21)(D);
- (z) safety clean parts washers for maintenance work;
- (aa) electro slag remelt operation;
- (bb) noncontact cooling towers used with chiller systems (no chromates);
- (cc) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations [326 IAC 6-3-2];
- (dd) any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (ee) the Continuous Draw Cell (CDC) Line, which includes a precoat operation, a draw bench operation, an initial alkaline cleaning operation, a straightening operation, a sawing operation, chamfering operation, an intermediate alkaline cleaning operation, an oxidizing operation, and a final alkaline cleaning operation;
  - (1) The precoat operation utilizes a calcium hydroxide (lime) aqueous solution, which does not contain any VOC or HAP, to protect the steel bars during the drawing operation;
  - (2) The draw bench operation uses small amount of oil, a nonvolatile material, to protect the drawing dies from scratching;
  - (3) The three (3) alkaline operations utilize HAP-free aqueous solutions containing 1% by weight of VOC;
  - (4) The sawing operation is attached to a baghouse (ID# CDC-BH) that has a design maximum outlet grain loading of 0.003 gr/dscf and a gas flow rate of 2,942 actual cubic feet of air per minute [326 IAC 6-3-2]; and
  - (5) The oxidizing operation uses nitric acid solution to oxidize the surface of stainless steel bars. It is designed with water curtains as an integral part of the process to recover and neutralize nitric acid fumes and to prevent cross contamination with the intermediate and final alkaline cleaning operations [326 IAC 6-3-2].

### Existing Approvals

Since the issuance of the FESOP 003-14978-000111 on July 26, 2002, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 003-21110-00011 issued on May 3, 2005.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
E-4	V	5	6	100,000	150
E-6	V	12	5	20,000	150
E-9	S	22	2 x 1	3,500	120
E-10	S	12	1 x 1	4,500	250
E-12	S	50	4.5	33,139	120

### Emission Calculations

See Appendix A of this document for detailed emission calculations. (1 through 23)

### County Attainment Status

The source is located in Allen County

Pollutant	Status
PM <sub>10</sub>	attainment
PM <sub>2.5</sub>	attainment
SO <sub>2</sub>	attainment
NOx	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Allen County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air

Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Allen County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, 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.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

**Unrestricted Potential Emissions**

<b>Pollutant</b>	<b>tons/year</b>
PM	591.3
PM <sub>10</sub>	86.1
SO <sub>2</sub>	0.8
VOC	8.2
CO	125.1
NO <sub>x</sub>	188.1
Lead	0.41

<b>HAPs</b>	<b>tons/year</b>
Benzene	0.003
Dichlorobnzene	0.002
Formaldehyde	0.12
Hexane	2.7
Toluene	0.005
Lead	0.41
Cadmium	0.002
Chromium	6.7
Manganese	2.6
Nickel	2.1
Total	15

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of NO<sub>x</sub> and CO are equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their NO<sub>x</sub> and CO emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of lead is less than 5 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

(e) Fugitive Emissions

The source is involved in the process of heating and shaping of stainless steel bars and billets. Therefore, it is not one of the secondary metal processing facilities. Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward the determination of PSD applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1996

<b>Pollutant</b>	<b>Actual Emissions (tons/year)</b>
<b>PM</b>	0
<b>PM<sub>10</sub></b>	41
<b>SO<sub>2</sub></b>	21
<b>VOC</b>	15
<b>CO</b>	> 100
<b>NO<sub>x</sub></b>	45
<b>PB</b>	1.09

**Potential to Emit After Issuance**

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

Emission unit	Potential To Emit							
	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	VOC (tons/yr)	NOx (tons/yr)	CO (tons/yr)	Pb (tons/yr)	HAPs (tons/yr)
Passivation System (E3)	7.88	7.88	0	0	less than 21.49	less than 63.1	0	0.01
Eight (8) Charge Furnaces (B2a-B2h)	2.1	8.4	0.7	6.1	less than 75		0.0006	2.08
Four (4) Annealing Furnaces (B4a-B4d)	0.4	1.7	0.1	1.3			0.0001	0.43
One (1) Annealing Furnace. (ID # D3)	0.1	0.5	0	0.3			0	0.11
Natural Gas-Fired Bolier (#2)	0	0.1	0	0.1			0	0.03
Natural Gas-Fired Bolier (#3)	0.1	0.3	0	0.2			0	0.07
Natural Gas-Fired Bolier (CDC Boiler)	0.1	0.3	0	0.2			0	0.08
Ingot Grinding	0.58	0.26	0	0	0	0	0.13	2.13
Dry Grinding C3	0.07	0.03	0	0	0	0	0	0.85
CMI Grinder C5	0.07	0.03	0	0	0	0	0	0.01
Billet Shot Blasting C4	45.6	29.8	0	0	0	0	0	0.02
CBM Cut-off Saw D2	4.73	4.73	0	0	0	0	0.28	0.29
Old Bar Shot Blast E6	26.9	13.63	0	0	0	0	0	0.01
#1 Bar Shot Blast (E7)	26.9	13.63	0	0	0	0	0	0
Insignificant Activies	4.8	4.8	0	0	0	0	0	0
Total PTE after Issuance	120.3	86.1	0.8	8.2	< 96.5	< 63.1	0.41	Single HAP <10 Combined HAPs < 25

- (a) This existing stationary source is not major for PSD because the emissions of each attainment pollutants and PM are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

### **Federal Rule Applicability**

- (a) 326 IAC 12 and 40 CFR 60, Subpart Dc-Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Unit.

The CDC Boiler is subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc, Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Unit, because the boiler was constructed in 1998, which is after June 9, 1989, which is the applicability date for this rule and the boiler has a heat input capacity of less than 100 million Btu/hour but equal to 10 million Btu/hour. The specific facility subject to this rule includes the following.

- (1) a natural gas-fired boiler, identified as CDC boiler, constructed in 1998, with maximum heat input capacity of 10.0 million Btu per hour, exhausting through CDC boiler stacks [326 IAC 6-2-4].

Nonapplicable portion of the NSPS will not be included in the permit. The boiler is subject to the following portions of Subpart Dc

- (1) 40 CFR 60.40c (a)(b);  
(2) 40 CFR 60.41c; and  
(3) 40 CFR 60.48c (a)(1), (g)(i)(j).

- (b) The requirements of the New Source Performance Standard for 326 IAC 12 and 40 CFR 60, Subpart Dc (Standard of Performance for Small Industrial-Commercial Institutional Steam Unit), are not included in the permit for boiler #2 because construction of this unit commenced prior to June 9, 1989.
- (c) The requirements of the New Source Performance Standard for 326 IAC 12 and 40 CFR 60, Subpart Dc (Standard of Performance for Small Industrial-Commercial Institutional Steam Unit), are not included in the permit for boiler #3 because the heat input capacity is less than 10 MMBtu/hr.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) included in this permit renewal.

### State Rule Applicability - Entire Source

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

The source was constructed in 1968 and is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 (Prevention of Significant Deterioration). Although the source has an uncontrolled potential to emit in excess of 250 tons per year of PM, the source has agreed to limit the PTE of PM to less than 250 tons per year.

The PM emissions shall be limited as follows:

Operation	PM Emission Limits (lbs/hr)
Billet Shot Blasting (C4)	10.4
Old Bar Shot blasting Operation (E6)	6.15
#1 Shot Blasting Operation(E7)	6.15

Compliance with the above limits in combination with potential PM emissions from the eight (8) pre-heat charger furnaces, four (4) annealing furnaces, one (1) annealing furnace, passivation system, and the insignificant activities will limit the sourcewide PM emissions to less than 250 tons per twelve (12) consecutive month period, and will render 326 IAC 2-2 (PSD) not applicable to this source.

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

Revision to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. The Permittee is no longer required to submit an emission statement, therefore, the emission statement requirement is removed from the Permit.

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

Pursuant to this rule, the amount of NOx and CO shall be limited to less than one hundred (100) tons per year.

- (a) The uncontrolled NOx emissions are more than 100 tons per year for this source. Therefore a federally enforceable limit for NOx emissions shall be established for this source. The natural gas usage of the eight (8) preheat charge furnaces, four (4) annealing furnaces, one (1) annealing furnace and the insignificant activities shall be less than 1,500 million cubic feet per twelve (12) consecutive month period, with compliance determined at the end of each month, and the NOx emissions shall not exceed 100 pounds per million cubic feet of natural gas.
- (b) The passivation production for the passivation system shall be less than 35,000 tons of steel per twelve (12) consecutive month period, with compliance determined at the end of each month, and the NOx emissions from the passivation system shall not exceed 1.23 pounds per ton of metal.
- (c) The natural gas usage limit established for NOx, and CO emission rate of 84.0 pounds per million cubic feet of natural gas usage will also limit source wide CO emissions to less than 100 tons per year.

Compliance with the above limits, will limit the source wide NOx and CO emissions to less than 100 tons per twelve (12) consecutive month period, each, and will render 326 IAC 2-7 (Part 70) not applicable to this source.

326 IAC 5-1 (Opacity Limitations)

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

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

**State Rule Applicability - Individual Facilities**

326 IAC 6-2-3 (Particulate Emissions Limitations for Indirect Heating Facilities)

This rule requires that particulate matter (PM) emissions from natural gas boilers # 2, which were built prior to September 21, 1983, to not exceed 6.4 pounds per million Btu. The following calculation determines compliance with 326 IAC 6-2-3 for indirect heating facilities (i.e. boilers) built prior to September 21, 1983.

$$\text{Limit} = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = 6.4 \text{ lb/MMBtu}$$

Where:

- C = 50 micrograms/cu. Meter, maximum ground level concentration
- Q = 3.35 MMBtu/hr, heat input rate
- N = 1 number of stacks
- a = 0.67 dimensionless, plume rise factor
- h = 36 ft, average stack height

Pursuant to 326 IAC 6-2-3(e), since the boiler was constructed after June 8, 1972, the particulate emissions shall not exceed 0.6 lbs/MMBtu.

326 IAC 6-2-4 (Particulate Emissions Limitations for Indirect Heating Facilities)

The natural gas-fired boiler #3 and CDC boiler are subject to 326 IAC 6-2-4 (Particulate Emissions for Sources of indirect Heating) because they were constructed in 1990 and 1998, respectively.

Pursuant to this rule, the particulate matter emissions from boiler #3 and CDC boiler shall be limited as follows:

Year	Unit	Q (MMBtu/hr)	Pt (lb/MMBtu)	Emission Limit (lb/MMBtu)
1990	#3	3.35+8 =11.35	0.58	0.58
1998	CDC	3.35+8+10 =21.35	0.49	0.49

The above values were determined from the following equation:

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

Where:

- Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and  
Q = Total source maximum operating capacity (MMBtu/hr).

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

Pursuant to 326 IAC 6-3-2(e), (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the sawing operation, and oxidizing operation shall not exceed the pounds per hour emission rate established by the equation:

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

$$E = 4.10 \times P^{0.67}$$

Where:

- P = process weight in tons/hr and  
E = rate of emission in pounds per hour.

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

Pursuant to 326 IAC 6-3-2 (e), the allowable particulate matter (PM) emissions, from the following emission units shall not exceed the PM limits as specified in the table below:

Operation	Process weight (tons/hr)	Allowable Limits (lbs/hr)
Ingot Grinding (B1)	13.163	23.05
Dry Grinding (C3)	1.6	5.6
CMI Grinder (C5)	1.6	5.6
Billet Shot Blasting (C4)	4.0	10.4
CMB Cut-off saw (D2)	5.14	12.3
Passivation System (E3)	4.0	10.4
Old Bar Shot blasting Operation (E6)	1.83	6.15
#1 Shot Blasting Operation(E7)	1.83	6.15

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

$$E = 4.10 P^{0.67}$$

Where:

- E = rate of emission in pounds per hour; an  
P = process weight rate in tons per hour.

The control equipment shall be in operation at all times the associated facility is in operation.

**Testing Requirements**

The Permittee shall perform NOx testing on the passivation system utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

**Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action. If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Billet shot blasting (baghouse, stack E9).	Water Pressure Drop	Daily	1 to 4 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
	Visible Emissions		Normal-Abnormal	
Passivation system (Mist eliminator, stack E12)	Visual observation	Daily	Normal-Abnormal	Response Steps
	Surface tension		Optimum baseline range	

Note: N/A (Not applicable)

Compliance monitoring for ingot grinding and CBM cut-off saw are not required as they can comply without control device. Preventive maintenance plan are not required for these units.

**Recommendation**

The staff recommends to the Commissioner that the FESOP Renewal 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 October 26, 2006.

**Conclusion**

The operation of this Valbruna Slater Stainless, Inc shall be subject to the conditions of the attached FESOP Renewal No. 003-23815-00011

**Appendix A: Emission Calculations  
Ingot Grinding**

**Company Name:** Valbruna Slater Stainless, Inc  
**Plant Location:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**Permit Number:** F003-23815-00011  
**Permit Reviewer:** Josiah Balogun  
**Date:** 23-Apr-07

Process	Rate (tons ingot/hr)	Pollutant	Ef (lb/ton produced)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
Ingot Grinding	13.163	PM	0.99	57.08	14.27	Dust	75.00%
		PM-10	0.99	57.08	14.27	Collection	
		SO2	0.00	0.00	0.00	House	
		NOx	0.00	0.00	0.00		
		VOC	0.00	0.00	0.00		
		CO	0.00	0.00	0.00		
		chromium	0.09	5.07	1.27		
		manganese	0.05	2.83	0.71		
		nickel	0.01	0.49	0.49		
		arsenic	0.00	0.00	0.00		
		cadmium	0.00	0.00	0.00		
		selenium	0.00	0.00	0.00		
		Lead	0.00	0.13	0.13		

Methodology

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

EPA SCC# 3-0300912 AP -42: This steel emission factor is zero, but a conservative estimate of 0.99 is taken as it was accepted by the source.

**Appendix A: Emission Calculations**

**Dry Grinding**

**Company Name:** Valbruna Slater Stainless, Inc

**Plant Location:** 2400 Taylor Street West, Fort Wayne, IN 46802

**Permit Number:** F003-23815-00011

**Permit Reviewer:** Josiah Balogun

**Date:** 23-Apr-07

Process	Rate (tons billets/hr)	Pollutant	Ef (lb/ton produced)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
Dry Grinding	1.6	PM	0.01	0.07	0.07	none	none
		PM-10	0.0045	0.03	0.03	none	none
		SO2	0	0.00	0.00		
		NOx	0	0.00	0.00		
		VOC	0	0.00	0.00		
		CO	0	0.00	0.00		
		chromium	0.073	0.51	0.51	none	none
		manganese	0.007	0.05	0.05	none	none
		nickel	0.041	0.29	0.29	none	none
		arsenic	0.00	0.00	0.00		
		cadmium	0.00	0.00	0.00		
		selenium	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		
		phenol	0.00	0.00	0.00		
		benzene	0.00	0.00	0.00		
		formaldehyde	0.00	0.00	0.00		
		xylene	0.00	0.00	0.00		
		toluene	0.00	0.00	0.00		

Methodology

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Emission Factor based on FIRE 6.01 SCC# 3-04-003-60

**Appendix A: Emission Calculations**

**CMI Grinder**

**Company Name:** Valbruna Slater Stainless, Inc

**Plant Location:** 2400 Taylor Street West, Fort Wayne, IN 46802

**Permit Number:** F003-23815-00011

**Permit Reviewer:** Josiah Balogun

**Date:** 23-Apr-07

Process	Rate (tons billets/hr)	Pollutant	Ef (lb/ton produced)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
CMI Grinder	1.6	PM	0.01	0.07	0.0007	baghouse	99.00%
		PM-10	0.0045	0.03	0.0003	baghouse	99.00%
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.00	0.00	0.00		
		CO	0.00	0.00	0.00		
		chromium	0.07	0.51	0.01	baghouse	99.00%
		manganese	0.01	0.05	0.00	baghouse	99.00%
		nickel	0.04	0.29	0.00	baghouse	99.00%
		arsenic	0.00	0.00	0.00		
		cadmium	0.00	0.00	0.00		
		selenium	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Methodology

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Emission Factor based on FIRE 6.01 SCC# 3-04-003-60

**Appendix A: Emission Calculations**

**Billet Shot Blasting**

**Company Name:** Valbruna Slater Stainless, Inc

**Plant Location:** 2400 Taylor Street West, Fort Wayne, IN 46802

**Permit Number:** F003-23815-00011

**Permit Reviewer:** Josiah Balogun

**Date:** 23-Apr-07

Process	Rate (tons billets/hr)	Pollutant	Ef (lb/ton produced)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
Billet Shot Blasting	4.0	PM	17	297.84	2.98	baghouse	99.00%
		PM-10	1.7	29.78	0.30	baghouse	99.00%
		SO2	0	0.00	0.00		
		NOx	0	0.00	0.00		
		VOC	0	0.00	0.00		
		CO	0	0.00	0.00		
		Chrome	0.05	0.88	0.01	baghouse	99.00%
		Nickel	0.03	0.53	0.01	baghouse	99.00%
		manganese	0.01	0.18	0.00	baghouse	99.00%

Methodology

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

EPA SCC# 3-04-007-11

**Appendix A: Emission Calculations**

**CBM cut-off saw**

**Company Name:** Valbruna Slater Stainless, Inc

**Plant Location:** 2400 Taylor Street West, Fort Wayne, IN 46802

**Permit Number:** F003-23815-00011

**Permit Reviewer:** Josiah Balogun

**Date:** 23-Apr-07

Process	Rate (tons billets/hr)	Pollutant	Ef (lb/ton produced)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
CBM cut-off saw	5.1	PM	0.21	4.73	0.05	Baghouse	99.00%
		PM-10	0.21	4.73	0.05		99.00%
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.00	0.00	0.00		
		CO	0.00	0.00	0.00		
		chromium	0.02	0.43	0.00	Baghouse	99.00%
		manganese	0.002	0.05	0.00	Baghouse	99.00%
		nickel	0.01	0.23	0.00	Baghouse	99.00%
		arsenic	0.0004	0.01	0.01		
		cadmium	0.00	0.00	0.00		
		selenium	0.00	0.00	0.00		
		Lead	0.01	0.28	0.28		

Methodology

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Emission factor from stack testing in November 1995, observed and approved by IDEM

**Appendix A: Emission Calculations**

**Passivation System**

**Company Name:** Valbruna Slater Stainless, Inc

**Plant Location:** 2400 Taylor Street West, Fort Wayne, IN 46802

**Permit Number:** F003-23815-00011

**Permit Reviewer:** Josiah Balogun

**Date:** 23-Apr-07

Process	Rate (tons bars/hr)	Pollutant	Ef (lb/ton produced)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
Passivation System	4.0	PM	0.45	7.88	7.88		
		PM-10	0.45	7.88	7.88		
		SO2	0.00	0.00	0.00		
		NOx	2.23	39.07	21.49	foam	45.00%
		VOC	0.00	0.00	0.00		
		CO	0.00	0.00	0.00		
		Hydroflouric Acid	0.19	3.33	3.33		
		cobalt	0.00	0.00	0.00		
		nickel	0.00	0.00	0.00		
		manganese	0.00	0.01	0.01		
		cadmium	0.00	0.00	0.00		
		selenium	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Methodology

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Emission factor from stack testing in November 1995, observed and approved by IDEM

**Appendix A: Emission Calculations**

**Old Bar Shot Blast**

**Company Name:** Valbruna Slater Stainless, Inc

**Plant Location:** 2400 Taylor Street West, Fort Wayne, IN 46802

**Permit Number:** F003-23815-00011

**Permit Reviewer:** Josiah Balogun

**Date:** 23-Apr-07

Process	Rate (tons iron/hr)	Pollutant	Ef (lb/ton produced)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
Old Bar Shot Blast	1.83	PM	17	136.26	2.73	baghouse	98.00%
		PM-10	1.7	13.63	0.27	baghouse	98.00%
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.00	0.00	0.00		
		CO	0.00	0.00	0.00		
		Chrome	0.05	0.40	0.01	baghouse	98.00%
		Nickel	0.03	0.24	0.00	baghouse	98.00%
		manganese	0.01	0.08	0.00	baghouse	98.00%

Methodology

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

EPA SCC# 3-04-007-11

**Appendix A: Emission Calculations**

**# 1 Bar Shot Blast**

**Company Name:** Valbruna Slater Stainless, Inc

**Plant Location:** 2400 Taylor Street West, Fort Wayne, IN 46802

**Permit Number:** F003-23815-00011

**Permit Reviewer:** Josiah Balogun

**Date:** 23-Apr-07

Process	Rate (tons iron/hr)	Pollutant	Ef (lb/ton produced)	Ebc (tons/yr)	Eac (tons/yr)	Type of Control	Control Efficiency (%)
# 1 Bar Shot Blast	1.83	PM	17	136.26	2.73	baghouse	98.00%
		PM-10	1.7	13.63	0.27	baghouse	98.00%
		SO2	0	0.00	0.00		
		NOx	0	0.00	0.00		
		VOC	0	0.00	0.00		
		CO	0	0.00	0.00		
		Chrome	0.05	0.40	0.01	baghouse	98.00%
		Nickel	0.03	0.24	0.00	baghouse	98.00%
		manganese	0.01	0.08	0.00	baghouse	98.00%

Methodology

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

EPA SCC# 3-04-007-11