



**Thomas M. McDermott, Jr.**  
Mayor

**DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**CITY OF HAMMOND**

RONALD L. NOVAK

Director

August 16, 2007

Robert Wille  
Manager, Quality and Environmental  
ASF – Keystone, Inc.  
4831 Hohman Avenue  
Hammond, IN 46327-1579

Re: 089-24361-00204  
Administrative Amendment to  
Part 70 permit T089-8273-00204

Dear Mr. Wille:

ASF – Keystone, Inc. was issued a Part 70 operating permit on July 29, 2002 for a steel spring manufacturing plant. In a letter dated February 22, 2007, ASF - Keystone requested a permit amendment for the installation of a new spring grinder and the removal of an existing grinder.

According to the calculations submitted by ASF - Keystone and verified by HDEM, the potential to emit of the new grinder is below the levels that would require a modification under 326 IAC 2-7-10.5.

Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as shown in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit. For your convenience, the entire approval has been printed with the revised pages.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact this Department at (219) 853-6306.

Sincerely,

Original signed by:

Ronald Holder, Engineer  
Hammond Department of Environmental Management  
Air Pollution Control Division

ENCLOSURE

cc: IDEM-OAQ – Mindy Hahn - Permits Administration



**Thomas M. McDermott, Jr.**  
Mayor

**DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**CITY OF HAMMOND**

RONALD L. NOVAK

Director

**PART 70 OPERATING PERMIT**

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

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**ASF-Keystone, Inc.**

**Hammond Plant**

4831 Hohman Avenue  
Hammond, Indiana 46327

(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.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 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.

<b>Operation Permit No.: T089-8273-00204</b>	
Original Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Original Issue Date: July 29, 2002
Original Issued by: Ronald L. Novak, Director Hammond Department of Environmental Management	Permit Expiration Date: July 29, 2007

Administrative Amendment 089-16102-00204  
Administrative Amendment 089-19447-00204

issued October 25, 2002.  
issued September 1, 2004

Administrative Amendment: 089-24361-00204	Pages Affected: 1, 4, 8-32, 35-37, and 58
Original signed by: Issued by: _____ Ronald L. Novak, Director Hammond Department of Environmental Management	Issue Date: August 16, 2007

## TABLE OF CONTENTS

<b>A</b>	<b>SOURCE SUMMARY</b>	<b>8</b>
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
<b>B</b>	<b>GENERAL CONDITIONS</b>	<b>12</b>
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]	
B.3	Enforceability [326 IAC 2-7-7]	
B.4	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]	
B.8	Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]	
B.9	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.10	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.11	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]	
B.12	Emergency Provisions [326 IAC 2-7-16]	
B.13	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.14	Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination	
B.17	Permit Renewal [326 IAC 2-7-4]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.19	Permit Revision Under Economic Incentives and Other Programs	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]	
B.23	Transfer of Ownership or Operation [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]	
<b>C</b>	<b>SOURCE OPERATION CONDITIONS</b>	<b>24</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
C.1	Opacity [326 IAC 5-1]	
C.2	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.3	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.4	Fugitive Dust Emissions [326 IAC 6-4]	
C.5	Fugitive Dust Emissions [326 IAC 6-1-11.1]	
C.6	Lake County Particulate Matter Contingency Measures [326 IAC 6-1-11.2]	
C.7	Operation of Equipment [326 IAC 2-7-6(6)]	
C.8	Stack Height [326 IAC 1-7]	
C.9	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-7-6(1)]</b>	
C.10	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.11	Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.13 Continuous Compliance Plan [326 IAC 6-1-10.1(l)]
- C.14 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.15 Monitoring Methods [326 IAC 3]
- C.16 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

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

- C.17 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.18 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.19 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.20 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

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

- C.21 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS – 50-Ft. Bar Furnace (Unit ID 2-5027)**

33

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

- D.1.1 Particulate Matter less than 10 microns in diameter (PM10)
- D.1.2 Sulfur Dioxide (SO<sub>2</sub>)

**Compliance Determination Requirements**

- D.1.3 Testing Requirements [326 IAC 2-7-6(1)]

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

- D.1.4 Compliance Monitoring Requirements

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

- D.1.5 Record Keeping and Reporting Requirements

**D.2 FACILITY OPERATION CONDITIONS - Medium Screw Furnace (Unit ID 2-5075)**

34

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

- D.2.1 Particulate Matter less than 10 microns in diameter (PM10)
- D.2.2 Sulfur Dioxide (SO<sub>2</sub>)

**Compliance Determination Requirements**

- D.2.3 Testing Requirements [326 IAC 2-7-6(1)]

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

- D.2.4 Compliance Monitoring Requirements

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

- D.2.5 Record Keeping and Reporting Requirements

**D.3 FACILITY OPERATION CONDITIONS - Nine (9) Spring Grinders 35**

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

- D.3.1 Particulate Matter Limitations for Lake County [326 IAC 6.8]
- D.3.2 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-4]
- D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.3.4 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]
- D.3.5 Particulate Matter (PM)

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

- D.3.6 Visible Emissions Notations
- D.3.7 Parametric Monitoring
- D.3.8 Broken or Failed Bag Detection

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

- D.3.9 Record Keeping Requirements

**D.4 FACILITY OPERATION CONDITIONS - Large Line Coil Spring Manufacturing Process 38**

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

- D.4.1 Particulate Matter less than 10 microns in diameter (PM10)
- D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.4.3 Testing Requirements [326 IAC 2-7-6(1)]
- D.4.4 Particulate Matter

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

- D.4.5 Visible Emissions Notations
- D.4.6 Parametric Monitoring

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

- D.4.7 Record Keeping Requirements

**D.5 FACILITY OPERATION CONDITIONS - Medium Line Spring Manufacturing Process 40**

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

- D.5.1 Particulate Matter less than 10 microns in diameter (PM10)
- D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.5.3 Testing Requirements [326 IAC 2-7-6(1)]
- D.5.4 Particulate Matter

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

- D.5.5 Visible Emissions Notations
- D.5.6 Parametric Monitoring

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

- D.5.7 Record Keeping Requirements

---

<b>D.6</b>	<b>FACILITY OPERATION CONDITIONS - Small Line Coil Spring Manufacturing Process</b>	<b>42</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
D.6.1	Particulate Matter less than 10 microns in diameter (PM10)	
D.6.2	Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
	<b>Compliance Determination Requirements</b>	
D.6.3	Testing Requirements [326 IAC 2-7-6(1)]	
D.6.4	Particulate Matter	
	<b>Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]</b>	
D.6.5	Visible Emissions Notations	
D.6.6	Parametric Monitoring	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
D.7.6	Record Keeping Requirements	
<b>D.7</b>	<b>FACILITY OPERATION CONDITIONS - Sellers Boiler No. 4-5509</b>	<b>44</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
D.7.1	Particulate Matter less than 10 microns in diameter (PM10)	
D.7.2	Sulfur Dioxide (SO <sub>2</sub> )	
	<b>Compliance Determination Requirements</b>	
D.7.3	Testing Requirements [326 IAC 2-7-6(1)]	
	<b>Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]</b>	
D.7.4	Compliance Monitoring Requirements	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
D.7.5	Record Keeping and Reporting Requirements	
<b>D.8</b>	<b>FACILITY OPERATION CONDITIONS - Spray Painting Operation</b>	<b>45</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
D.8.1	Volatile Organic Compound (VOC) [326 IAC 8-2-9]	
D.8.2	Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
	<b>Compliance Determination Requirements</b>	
D.8.3	Volatile Organic Compounds	
D.8.4	Particulate Matter	
	<b>Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]</b>	
D.8.5	Monitoring	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
D.8.6	Record Keeping Requirements	

---

<b>D.9</b>	<b>FACILITY OPERATION CONDITIONS - Eleven (11) Spring Coating Dip Tanks</b>	<b>47</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
D.9.1	Volatile Organic Compound (VOC) [326 IAC 8-2-9]	
	<b>Compliance Determination Requirements</b>	
D.9.2	Volatile Organic Compounds	
	<b>Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]</b>	
D.9.3	Compliance Monitoring Requirements	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
D.9.4	Record Keeping Requirements	
<b>D.10</b>	<b>FACILITY OPERATION CONDITIONS - Insignificant Activity – Small Screw Furnace</b>	<b>49</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
D.10.1	Particulate Matter less than 10 microns in diameter (PM10)	
D.10.2	Sulfur Dioxide (SO <sub>2</sub> )	
	<b>Compliance Determination Requirements</b>	
D.10.3	Testing Requirements [326 IAC 2-7-6(1)]	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
D.10.4	Record Keeping and Reporting Requirements	
<b>D.11</b>	<b>FACILITY OPERATION CONDITIONS - Insignificant Activity – Large Slot Furnace</b>	<b>50</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
D.11.1	Particulate Matter less than 10 microns in diameter (PM10)	
D.11.2	Sulfur Dioxide (SO <sub>2</sub> )	
	<b>Compliance Determination Requirements</b>	
D.11.3	Testing Requirements [326 IAC 2-7-6(1)]	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
D.11.4	Record Keeping and Reporting Requirements	
<b>D.12</b>	<b>FACILITY OPERATION CONDITIONS - Insignificant Activity – Slot Furnaces (Medium Line)</b>	<b>51</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
D.12.1	Particulate Matter less than 10 microns in diameter (PM10)	
D.12.2	Sulfur Dioxide (SO <sub>2</sub> )	
	<b>Compliance Determination Requirements</b>	
D.12.3	Testing Requirements [326 IAC 2-7-6(1)]	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
D.12.4	Record Keeping and Reporting Requirements	

---

<b>D.13</b>	<b>FACILITY OPERATION CONDITIONS - Insignificant Activity – Small Slot Furnace</b>	<b>52</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
D.13.1	Particulate Matter less than 10 microns in diameter (PM10)	
D.13.2	Sulfur Dioxide (SO <sub>2</sub> )	
	<b>Compliance Determination Requirements</b>	
D.13.3	Testing Requirements [326 IAC 2-7-6(1)]	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
D.13.4	Record Keeping and Reporting Requirements	
<b>D.14</b>	<b>FACILITY OPERATION CONDITIONS - Insignificant Activity – Pangborn Shot Peener</b>	<b>53</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
D.14.1	Particulate Matter less than 10 microns in diameter (PM10)	
	<b>Compliance Determination Requirements</b>	
D.14.2	Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
D.14.3	Particulate Matter (PM)	
	<b>Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]</b>	
D.14.4	Visible Emissions Notations	
D.14.5	Parametric Monitoring	
D.14.6	Broken or Failed Bag Detection	
	<b>Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
D.14.7	Record Keeping Requirements	
<b>D.15</b>	<b>FACILITY OPERATION CONDITIONS - Insignificant Activity – Three (3) Wheelabrator Shot Peeners</b>	<b>55</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
D. 15.1	Particulate Matter less than 10 microns in diameter (PM10)	
	<b>Compliance Determination Requirements</b>	
D.15.2	Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
D.15.3	Particulate Matter (PM)	
	<b>Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]</b>	
D.15.4	Visible Emissions Notations	
D.15.5	Parametric Monitoring	
D.15.6	Broken or Failed Bag Detection	
	<b>Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
D.15.7	Record Keeping Requirements	
	<b>Certification</b>	<b>57</b>
	<b>Emergency Occurrence Report</b>	<b>58</b>
	<b>Quarterly Deviation and Compliance Monitoring Report</b>	<b>60</b>
	<b>Natural Gas Fired Boiler Certification</b>	<b>62</b>

## SECTION A

## SOURCE SUMMARY

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

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

The Permittee owns and operates a Steel Spring Coils Manufacturing plant.

Mailing Address: 1700 Walnut Street  
Granite City, Illinois 62040-3100

Source Address: 4831 Hohman Avenue  
Hammond, Indiana 46327

SIC Code: 3493 – Steel Springs, except wire

County Location: Lake  
County Status: Nonattainment for PM2.5  
Nonattainment for ozone under the 8-hour standard  
Attainment for all other criteria pollutants

Source Status: Part 70 Permit Program  
Major Source under Emission Offset Rules  
Not 1 of 28 source categories listed under 326 IAC 2-2

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

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

(1) 50-Ft. Bar Furnace (Unit ID 2-5027)

Screw furnaces are used to heat the entire bar prior to coiling. This unit has a maximum design capacity of 20.5 MMBtu/hr heat input and is natural gas-fired only.

(2) Medium Screw Furnace (Unit ID 2-5075)

Screw furnaces are used to heat the entire bar prior to coiling. This unit has a maximum design capacity of 13.0 MMBtu/hr heat input and is natural gas-fired only.

(3) Nine (9) Spring Grinders

This system includes the following grinders:

Unit ID	Unit Description	Maximum Design Rate (Tons of springs per hour)
3-0386	#2 Besly Ferris Wheel Grinder	1.66 for units 3-0386 and 3-0389 combined.
3-0389	Gardner Tub Grinder	- - -
3-0385	#1 Besly Ferris Wheel Grinder	1.47 for units 3-0385 and 3-0394 combined.
3-0394	Besly Swing Grinder	- - -
3-0249	Gardner Paddle Wheel Grinder	0.15
3-0247	Torrington Ferris Wheel Grinder	0.91
3-0244	#1 Mattison (Large) Grinder	4.31 for units 3-0244 and 3-0393 combined.
3-0393	#2 Mattison (Small) Grinder	- - -
3-0396	Vertical Opposing Disc Grinder	1.11

All nine units share an ETA 2000 Pulse-jet baghouse (Unit No. 3-3037).

(4) Large Line Coil spring Manufacturing Process

This process includes a draw furnace (No. 2-5164), which is used to stress-relieve the newly coiled springs and an oil quench tank (No. 3-2845). The maximum design rate of coil springs manufactured is 10,000 lbs/hr. The Draw Furnace is natural gas-fired only and has a maximum design capacity of 9.8 MMBtu/hr heat input. Particulate emissions (oil mists) generated during the quenching operation are controlled using an Electrostatic Precipitator (No. 3-3036).

(5) Medium Line Coil Spring Manufacturing Process

This process includes a draw furnace (No. 2-5097), which is used to stress-relieve the newly coiled springs and an oil quench tank (No. 3-2838). The maximum design rate of coil springs manufactured per hour is 6,000 lbs. The Draw Furnace is natural gas-fired only and has a maximum design capacity of 5.1 MMBtu/hr heat input. Particulate emissions (oil mists) generated during the quenching operation are controlled using an Electrostatic Precipitator (No. 3-3027).

(6) Small Line Coil Spring Manufacturing Process

This process includes a draw furnace (No. 2-5163), which is used to stress-relieve the newly coiled springs and an oil quench tank (No. 3-2821). The maximum design rate of coil springs manufactured per hour is 3,000 lbs. The Draw Furnace is natural gas-fired only and has a maximum design capacity of 5.1 MMBtu/hr heat input. Particulate emissions (oil mists) generated during the quenching operation are controlled using an Electrostatic Precipitator (No. 3-3024).

(7) Sellers Boiler No. 4-5509

This unit is used for spaceheating and to keep the quench oil fluid during colder weather. It has a maximum design capacity of 10.5 MMBtu/hr heat input and is natural gas-fired only.

(8) Spray Painting Operation (Booths 3-2714 and 3-2715)

Booth 3-2715 is used to spray paint on track recoiler assemblies only. Booth 3-2714 is used to coat springs. Particulate emissions are controlled by dry filters.

(9) Eleven (11) Spring Coating Dip Tanks

This operation includes the following units:

- (a) Dip Coating Stations 3-2865 and 3-2813 (Location: By Final Inspection Area). These dip coating stations are used to apply a clear coat on finished springs. This coating is thinned with a mixture of water and glycol ether.
- (b) Dip Coating Station 2865A (Location: By old tumbler/shotpeener – Medium Spring Line Area). This station is used to apply a clear coat on finished springs. This coating is thinned with a mixture of water and glycol ether.
- (c) Dip Coating Stations 3-2867, 3-2868, and 3-2869 (Location: By Medium Magnaflux Area by the Torrington Grinder). 3-2867 is used to apply a clear coat thinned with a mixture of water and glycol ether. 3-2869 is used to apply a rust protectant on finished springs. 3-2868 is used to coat the springs with quench oil.
- (d) Dip Coating Stations 3-2870, 3-2871, and 3-2872 (Location: Large Magnaflux Area Northeast corner of the plant). 3-2870 is used to apply a clear coat thinned with a mixture of water and glycol ether on finished springs. 3-2871 holds rust preventative coating. 3-2872 holds quench oil.
- (e) Dip Coating Stations 3-2873 and 3-2874 (Location: Fabrication Department). 3-2873 is used to apply a rust protectant on finished springs. 3-2874 holds quench oil.

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

This stationary source also consists of insignificant activities with potential uncontrolled emissions below the exemption levels specified in 326 IAC 2-1.1-3(d)(1), including those defined in 326 IAC 2-7-1(21):

(1) Small Screw Furnace (Unit ID 2-5085)

Screw furnaces are used to heat the entire bar prior to coiling. This unit has a maximum design capacity of 8.0 MMBtu/hr heat input and is natural gas-fired only.

(2) Large Slot Furnace (Unit ID 2-5036)

The slot furnace is used to heat bar ends prior to tapering. This unit has a maximum design capacity of 2.5 MMBtu/hr heat input and is natural gas-fired only.

(3) Slot Furnaces (Medium Line) (Unit Ids 2-5014 and 2-5015)

The slot furnaces are used to heat bar ends prior to tapering. These units have a combined maximum design capacity of 2.6 MMBtu/hr heat input and are natural gas-fired only.

(4) Slot Furnace (Small Line) (Unit ID 2-5006)

The slot furnace is used to heat bar ends prior to tapering. This unit has a maximum design capacity of 1.5 MMBtu/hr heat input and is natural gas-fired only.

(5) Pangborn Shot Peener (Unit No. 3-1804)

This unit is used to clean scale and rust from coil springs using steel shots. Particulate emissions are controlled by a baghouse (No. 3-3017).

(6) Three (3) Wheelabrator Shot Peeners

Wheelabrator Shot Peeners (No. 3-1811, 3-1821, and 3-1823) are used to clean scale and rust from coil springs using steel shots. Each unit is controlled by a baghouse (No. 3-1811, 3-3022, and 3-1823, respectively).

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

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

- (1) It is a major source, as defined in 326 IAC 2-7-1(22);

**SECTION B**

**GENERAL CONDITIONS**

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

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

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

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

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

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

Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by HDEM.

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

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

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

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

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

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

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information 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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

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

- (b) The Permittee shall furnish to IDEM-OAQ and HDEM within a reasonable time, any information that IDEM-OAQ and HDEM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM-OAQ and HDEM copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) 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.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

and

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

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

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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

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

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

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

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

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM-OAQ and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM-OAQ and HDEM. IDEM-OAQ and HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

#### B.12 Emergency Provisions [326 IAC 2-7-16]

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

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM – OAQ and HDEM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

(IDEM – OAQ)

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

(HDEM)

Telephone Number: 219-853-6306

Facsimile Number: 219-853-6343

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

Indiana Department of Environmental Management

Compliance Branch, Office of Air Quality

100 North Senate Avenue

MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management

5925 Calumet Avenue

Hammond, Indiana 46320

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM-OAQ and HDEM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

- (f) Failure to notify IDEM-OAQ and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM – OAQ or HDEM has issued the modification. [326 IAC 2-7- 12(b)(7)]

B.14 Prior Permit Superseded [326 IAC 2-1.1-9.5]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

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

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
  - (1) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a

notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM-OAQ or HDEM determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM-OAQ or HDEM to reopen and revise this permit shall follow the same procedures that apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM-OAQ or HDEM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM-OAQ or HDEM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM-OAQ and HDEM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(40) and 326 IAC 2-7-1(21). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is

submitted by any other means, it shall be considered timely if received by IDEM-OAQ and HDEM on or before the date it is due.

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

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

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

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

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

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

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

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

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

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

modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

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

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

and

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

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

- (5) The Permittee maintains records on site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and

- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM-OAQ or U.S. EPA is required.

- B.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

- B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

- B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM – OAQ and HDEM within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM – OAQ or HDEM the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233- 0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.4 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-1-11.1]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The PM10 emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan.

C.6 Lake County Particulate Matter Contingency Measures [326 IAC 6-1-11.2]

The Permittee shall comply with the applicable provisions of 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures).

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

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

C.8 Stack Height [326 IAC 1-7]

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

C.9 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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, 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) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

#### **C.10 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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM-OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM-OAQ and HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM-OAQ and HDEM if the source 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.11 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. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

##### **C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

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

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

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

C.13 Continuous Compliance Plan [326 IAC 6-1-10.1(l)]

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

C.14 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.15 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.16 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.17 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February 11, 1991.
- (b) If the ERP is disapproved by IDEM–OAQ and HDEM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) Upon direct notification by IDEM–OAQ and HDEM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.18 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.19 Compliance Response Plan – Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM-OAQ and HDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit, and an expected timeframe for taking reasonable steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shutdown, the IDEM-OAQ and HDEM shall be promptly notified of the expected date of the shutdown, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B – Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the equipment is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.20 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.21 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

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

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

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

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

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

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information 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 kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM 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.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue  
Hammond, Indiana 46320

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM-OAQ and HDEM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

#### **Stratospheric Ozone Protection**

##### **C.24 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:** 50-Ft. Bar Furnace (Unit ID 2-5027) used to heat the entire bar prior to coiling, with a maximum design capacity of 20.5 MMBtu/hr heat input and natural gas fired only.

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

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

#### D.1.1 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (h), emissions of particulate matter less than ten microns in diameter (PM10) from this unit shall be limited to 0.003 lbs/MMBtu and 0.062 lbs/hr. In addition, this unit shall fire natural gas only.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>)

Pursuant to 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations), subsection (b), this unit is limited to sulfur dioxide emissions of 0.3 lbs/MMBtu. However, 326 IAC 6-1-10.1(h) requires natural gas combustion only. Thus, the more stringent limitation for SO<sub>2</sub> emissions inherent with natural gas combustion is the allowable.

### Compliance Determination Requirements

#### D.1.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, if testing is required, compliance with the (PM10) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Compliance Monitoring Requirements

#### D.1.4 There are no compliance monitoring requirements applicable to this facility.

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

#### D.1.5 Record Keeping and Reporting Requirements

There are no record keeping and reporting requirements for this facility.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:** Medium Screw Furnace (Unit ID 2-5075) used to heat the entire bar prior to coiling, with a maximum design capacity of 13.0 MMBtu/hr heat input and natural gas fired only.

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

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

#### D.2.1 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (h), emissions of particulate matter less than ten microns in diameter (PM10) from this unit shall be limited to 0.003 lbs/MMBtu and 0.039 lbs/hr. In addition, this unit shall fire natural gas only.

#### D.2.2 Sulfur Dioxide (SO<sub>2</sub>)

Pursuant to 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations), subsection (b), this unit is limited to sulfur dioxide emissions of 0.3 lbs/MMBtu. However, 326 IAC 6-1-10.1(h) requires natural gas combustion only. Thus, the more stringent limitation for SO<sub>2</sub> emissions inherent with natural gas combustion is the allowable.

### Compliance Determination Requirements

#### D.2.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, if testing is required, compliance with the (PM10) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Compliance Monitoring Requirements

#### D.2.4 There are no compliance monitoring requirements applicable to this facility.

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

#### D.2.5 Record Keeping and Reporting Requirements

There are no record keeping and reporting requirements for this facility.

**SECTION D.3 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:** Nine (9) Spring Grinders with the following Unit IDs, Descriptions, and Maximum Design Rates, controlled by one (1) ETA 2000 Pulse-jet baghouse (3-3037) and exhausting to Stack 3.

Unit ID	Unit Description	Maximum Design Rate (Tons of springs per hour)
3-0386	#2 Besly Ferris Wheel Grinder	1.66 for units 3-0386 and 3-0389 combined.
3-0389	Gardner Tub Grinder	- - -
3-0385	#1 Besly Ferris Wheel Grinder	1.47 for units 3-0385 and 3-0394 combined.
3-0394	Besly Swing Grinder	- - -
3-0249	Gardner Paddle Wheel Grinder	0.15
3-0247	Torrington Ferris Wheel Grinder	0.91
3-0244	#1 Mattison (Large) Grinder	4.31 for units 3-0244 and 3-0393 combined.
3-0393	#2 Mattison (Small) Grinder	- - -
3-0396	Vertical Opposing Disc Grinder	1.11

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

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

D.3.1 Particulate Matter Limitations for Lake County [326 IAC 6.8]

Pursuant to 326 IAC 6.8-1-2, particulate matter emissions from the stack of the baghouse controlling emissions from the Vertical Opposing Disc Grinder 3-0396 shall not exceed 0.03 grain per dry standard cubic foot (dscf).

D.3.2 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-4]

Pursuant to 326 IAC 6.8-2-4 (Lake County PM10 Emission Requirements), emissions of particulate matter less than ten microns in diameter (PM10) from the following Spring Grinders shall be limited to the following:

Unit ID	PM10 Emission Limit (lbs/ton)	PM10 Emission Limit (lbs/hr)
3-0386	1.083	0.045
3-0389	(Combined limit for Units 3-0386 & 3-0389)	
3-0385	0.019	0.05
3-0249	3.792	1.82
3-0247	0.019	0.03
3-0244	0.021	0.040

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.3.4 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Condition D.3.1 and D.3.2, the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. A demonstration of compliance with the PM-10 limits in D.3.2 may be used to demonstrate compliance with the PM limit in D.3.1, provided the required methods and test protocols are pre-approved for that purpose by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

#### D.3.5 Particulate Matter (PM)

Pursuant to 326 IAC 2-7-6 and in order to comply with D.3.1 and D.3.2, the Baghouse (3-3037) for PM control shall be in operation and control emissions at all times when any of the grinders are in operation.

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

#### D.3.6 Visible Emissions Notations

- (a) Visible emission notations of the Baghouse (Unit ID 3-3037) stack exhaust shall be performed at least once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

#### D.3.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Nine Spring Grinders at least once per shift when any one of the nine grinders is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside of the above mentioned range for any one reading is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

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

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

In the event that bag failure has been observed:

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

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

#### D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations of the Baghouse (Unit ID 3-3037) stack exhaust.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:
  - (1) Records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle operation.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.4 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:** Large Line Coil Spring Manufacturing Process including a draw furnace (No. 2-5164) used to stress-relieve the newly coiled springs and an oil quench tank (No. 3-2845). The maximum design rate of coil springs manufactured is 10,000 lbs/hr. The Draw Furnace is natural gas-fired only and has a maximum design capacity of 9.8 MMBtu/hr heat input. Particulate emissions (oil mists) generated during the quenching operation are controlled by an Electrostatic Precipitator (No. 3-3036).

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

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

#### D.4.1 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (d), emissions of particulate matter less than ten microns in diameter (PM10) from this unit shall be limited to 0.700 lbs/ton and 3.50 lbs/hr.

#### D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.4.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, if testing is required, compliance with the (PM10) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.4.4 Particulate Matter (PM)

Pursuant to 326 IAC 2-7-6 and in order to comply with D.4.1, the Electrostatic Precipitator (Unit ID 3-3036) for PM control shall be in operation and control emissions from the quench portion of this facility at all times when the Large Line Coil Spring Manufacturing unit is in operation.

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

#### D.4.5 Visible Emissions Notations

- (a) Visible emission notations of the Electrostatic Precipitator (No. 3-3036) stack exhaust shall be performed at least once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

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

#### D.4.6 Parametric Monitoring

In order to comply with D.4.1, the Permittee shall monitor the hours of operation of this facility and clean the Electrostatic Precipitator (Unit ID 3-3036) and cartridges after 400 hours or less of operation.

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

#### D.4.7 Record Keeping Requirements

- (a) To document compliance with Condition D.4.5, the Permittee shall maintain records of visible emission notations of the Electrostatic Precipitator (No. 3-3036) stack exhaust.
- (b) To document compliance with Condition D.4.6, the Permittee shall maintain records of the hours of operation of the electrostatic precipitator and the dates that the cartridges are cleaned.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.5 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:** Medium Line Coil Spring Manufacturing Process including a draw furnace (No. 2-5097) used to stress-relieve the newly coiled springs and an oil quench tank (No. 3-2838). The maximum design rate of coil springs manufactured is 6,000 lbs/hr. The Draw Furnace is natural gas-fired only and has a maximum design capacity of 5.1 MMBtu/hr heat input. Particulate emissions (oil mists) generated during the quenching operation are controlled by an Electrostatic Precipitator (No. 3-3027).

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

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

#### D.5.1 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (d), emissions of particulate matter less than ten microns in diameter (PM10) from this unit shall be limited to 0.700 lbs/ton and 2.10 lbs/hr.

#### D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.5.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, if testing is required, compliance with the (PM10) limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.5.4 Particulate Matter (PM)

Pursuant to 326 IAC 2-7-6 and in order to comply with D.5.1, the Electrostatic Precipitator (Unit ID 3-3027) for PM control shall be in operation and control emissions from the quench portion of this facility at all times when the Medium Line Coil Spring Manufacturing unit is in operation.

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

#### D.5.5 Visible Emissions Notations

- (a) Visible emission notations of the Electrostatic Precipitator (No. 3-3027) stack exhaust shall be performed at least once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

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

#### D.5.6 Parametric Monitoring

In order to comply with D.5.1, the Permittee shall monitor the number of hours of operation of this facility and clean the Electrostatic Precipitator (Unit ID 3-3027) and cartridges after 400 hours or less of operation.

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

#### D.5.7 Record Keeping Requirements

- (a) To document compliance with Condition D.5.5, the Permittee shall maintain records of visible emission notations of the Electrostatic Precipitator (No. 3-3027) stack exhaust.
- (b) To document compliance with Condition D.5.6, the Permittee shall maintain records of the hours of operation of the electrostatic precipitator and the dates that the cartridges are cleaned.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.6 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:** Small Line Coil Spring Manufacturing Process including a draw furnace (No. 2-5163) used to stress-relieve the newly coiled springs and an oil quench tank (No. 3-2821). The maximum design rate of coil springs manufactured is 3,000 lbs/hr. The Draw Furnace is natural gas-fired only and has a maximum design capacity of 5.1 MMBtu/hr heat input. Particulate emissions (oil mists) generated during the quenching operation are controlled by an Electrostatic Precipitator (No. 3-3024).

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

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

#### D.6.1 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (d), emissions of particulate matter less than ten microns in diameter (PM10) from this unit shall be limited to 0.014 lbs/ton and 0.02 lbs/hr.

#### D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.6.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, if testing is required, compliance with the (PM10) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.6.4 Particulate Matter (PM)

Pursuant to 326 IAC 2-7-6 and in order to comply with D.6.1, the Electrostatic Precipitator (Unit ID 3-3024) for PM control shall be in operation and control emissions from the quench portion of this facility at all times when the Small Line Coil Spring Manufacturing unit is in operation.

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

#### D.6.5 Visible Emissions Notations

- (a) Visible emission notations of the Electrostatic Precipitator (No. 3-3024) stack exhaust shall be performed at least once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

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

#### D.6.6 Parametric Monitoring

In order to comply with D.6.1, the Permittee shall monitor the hours of operation of this facility and clean the Electrostatic Precipitator (Unit ID 3-3024) and cartridges after 400 hours or less of operation.

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

#### D.6.7 Record Keeping Requirements

- (a) To document compliance with Condition D.6.5, the Permittee shall maintain records of visible emission notations of the Electrostatic Precipitator (No. 3-3024) stack exhaust.
- (b) To document compliance with Condition D.6.6, the Permittee shall maintain records of the hours of operation of the electrostatic precipitator and the dates that the cartridges are cleaned.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**SECTION D.7 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:** Sellers Boiler No. 4-5509 used for spaceheating and to keep the quench oil fluid during colder weather. The unit has a maximum design capacity of 10.5 MMBtu/hr heat input and is natural gas-fired only.

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

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

D.7.1 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (h), emissions of particulate matter less than ten microns in diameter (PM10) from this unit shall be limited to 0.003 lbs/MMBtu and 0.03 lbs/hr. In addition, this unit shall fire natural gas only.

D.7.2 Sulfur Dioxide (SO<sub>2</sub>)

Pursuant to 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations), subsection (b), this unit is limited to sulfur dioxide emissions of 0.3 lbs/MMBtu. However, 326 IAC 6-1-10.1(h) requires natural gas combustion only. Thus, the more stringent limitation for SO<sub>2</sub> emissions inherent with natural gas combustion is the allowable.

**Compliance Determination Requirements**

D.7.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, if testing is required, compliance with the (PM10) limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**Compliance Monitoring Requirements**

D.7.4 There are no compliance monitoring requirements applicable to this facility.

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

D.7.5 Record Keeping and Reporting Requirements

A semi-annual summary of the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six-month period being reported.

## SECTION D.8 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:** Spray Painting Operation (Booths 3-2714 and 3-2715). Booth 3-2715 is used to spray paint on track recoiler assemblies only. Booth 3-2714 is used to coat springs. Particulate emissions are controlled using dry filters.

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

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

#### D.8.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied shall be limited to 3.5 pounds of VOC per gallon of coating less water, as delivered to the applicator for any calendar day, for air-dried/extreme performance coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### D.8.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.8.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.8.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

#### D.8.4 Particulate Matter (PM)

Pursuant to 326 IAC 2-7-6, the dry filters for PM control shall be in operation at all times when Spray Paint Booths (3-2714 and 3-2715) are in operation.

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

#### D.8.5 Monitoring

- (a) Daily inspections and manometer readings shall be performed to verify the placement, integrity and particle loading of the double dry filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

- (b) Redundant secondary particulate filter system shall be installed behind every primary particulate filter and, at each booth, a manometer reading of the secondary redundant filter system shall be recorded during each primary filter change to ensure that there is no overspray on the rooftops. Inspections of the plenum behind the secondary particulate filters shall be performed each time the secondary particulate filters are replaced. Inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground no less than once per quarter. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### **D.8.6 Record Keeping Requirements**

- (a) To document compliance with Condition D.8.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.8.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of operation;
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each day; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.8.5, the Permittee shall maintain records of daily inspections of the primary particulate filters and manometer readings across the primary filters, the manometer readings for the secondary particulate filters each time the primary filters are replaced, plenum filter inspections when the secondary particulate filters are replaced, quarterly rooftop inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

## SECTION D.9 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:** Spring Dip Coating Operation including the following dip tanks:

- (a) Dip Coating Stations 3-2865 and 3-2813 (Location: By Final Inspection Area). These dip coating stations are used to apply a clear coat on finished springs. This coating is thinned with a mixture of water and glycol ether.
- (b) Dip Coating Station 3-2865A (Location: By old tumbler/shotpeener – Medium Spring Line Area). This station is used to apply a clear coat on finished springs. This coating is thinned with a mixture of water and glycol ether.
- (c) Dip Coating Stations 3-2867, 3-2868, and 3-2869 (Location: By Medium Magnaflux Area by the Torrington Grinder). 3-2867 is used to apply a clear coat thinned with a mixture of water and glycol ether. 3-2869 is used to apply a rust protectant on finished springs. 3-2868 is used to coat the springs with quench oil.
- (d) Dip Coating Stations 3-2870, 3-2871, and 3-2872 (Location: Large Magnaflux Area Northeast corner of the plant). 3-2870 is used to apply a clear coat thinned with a mixture of water and glycol ether on finished springs. 3-2871 holds rust preventative coating. 3-2872 holds quench oil.
- (e) Dip Coating Stations 3-2873 and 3-2874 (Location: Fabrication Department). 3-2873 is used to apply a rust protectant on finished springs. 3-2874 holds quench oil.

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

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

#### D.9.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied shall be limited to 4.3 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day.

### Compliance Determination Requirements

#### D.9.2 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Condition D.9.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

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

D.9.3 There are no compliance monitoring requirements applicable to this facility.

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

#### D.9.4 Record Keeping Requirements

- (a) To document compliance with Condition D.9.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.9.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type

and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each day;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.10 FACILITY OPERATION CONDITIONS – Insignificant Activity

**Facility Description [326 IAC 2-7-5(15)]:** Small Screw Furnace (Unit ID 2-5085) used to heat the entire bar prior to coiling. This unit has a maximum design capacity of 8.0 MMBtu/hr heat input and is natural gas-fired only.

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

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

#### D.10.1 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (h), emissions of particulate matter less than ten microns in diameter (PM10) from this unit shall be limited to 0.003 lbs/MMBtu and 0.024 lbs/hr. In addition, this unit shall fire natural gas only.

#### D.10.2 Sulfur Dioxide (SO<sub>2</sub>)

Pursuant to 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations), subsection (b), this unit is limited to sulfur dioxide emissions of 0.3 lbs/MMBtu. However, 326 IAC 6-1-10.1(h) requires natural gas combustion only. Thus, the more stringent limitation for SO<sub>2</sub> emissions inherent with natural gas combustion is the allowable.

### Compliance Determination Requirements

#### D.10.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, if testing is required, compliance with the (PM10) limit specified in Condition D.10.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

#### D.10.4 Record Keeping and Reporting Requirements

There are no record keeping and reporting requirements for this facility.

## SECTION D.11 FACILITY OPERATION CONDITIONS – Insignificant Activity

**Facility Description [326 IAC 2-7-5(15)]:** Large Slot Furnace (Unit ID 2-5036) used to heat bar ends prior to tapering. This unit has a maximum design capacity of 2.5 MMBtu/hr heat input and is natural gas-fired only.

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

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

#### D.11.1 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (h), emissions of particulate matter less than ten microns in diameter (PM10) from this unit shall be limited to 0.003 lbs/MMBtu and 0.0075 lbs/hr. In addition, this unit shall fire natural gas only.

#### D.11.2 Sulfur Dioxide (SO<sub>2</sub>)

Pursuant to 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations), subsection (b), this unit is limited to sulfur dioxide emissions of 0.3 lbs/MMBtu. However, 326 IAC 6-1-10.1(h) requires natural gas combustion only. Thus, the more stringent limitation for SO<sub>2</sub> emissions inherent with natural gas combustion is the allowable.

### Compliance Determination Requirements

#### D.11.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, if testing is required, compliance with the (PM10) limit specified in Condition D.11.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

#### D.11.4 Record Keeping and Reporting Requirements

There are no record keeping and reporting requirements for this facility.

**SECTION D.12 FACILITY OPERATION CONDITIONS – Insignificant Activity**

**Facility Description [326 IAC 2-7-5(15)]:** Slot Furnaces (Medium Line) (Unit IDs 2-5014 and 2-5015) used to heat bar ends prior to tapering. These units have a combined maximum design capacity of 2.6 MMBtu/hr heat input and are natural gas-fired only.

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

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

D.12.1 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (h), emissions of particulate matter less than ten microns in diameter (PM10) from these units combined shall be limited to 0.003 lbs/MMBtu and 0.008 lbs/hr. In addition, this unit shall fire natural gas only.

D.12.2 Sulfur Dioxide (SO<sub>2</sub>)

Pursuant to 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations), subsection (b), this unit is limited to sulfur dioxide emissions of 0.3 lbs/MMBtu. However, 326 IAC 6-1-10.1(h) requires natural gas combustion only. Thus, the more stringent limitation for SO<sub>2</sub> emissions inherent with natural gas combustion is the allowable.

**Compliance Determination Requirements**

D.12.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, if testing is required, compliance with the (PM10) limit specified in Condition D.12.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.12.4 Record Keeping and Reporting Requirements

There are no record keeping and reporting requirements for this facility.

**SECTION D.13 FACILITY OPERATION CONDITIONS – Insignificant Activity**

**Facility Description [326 IAC 2-7-5(15)]:** Small Slot Furnace (Unit ID 2-5006) used to heat bar ends prior to tapering. This unit has a maximum design capacity of 1.5 MMBtu/hr heat input and is natural gas-fired only.

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

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

D.13.1 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (h), emissions of particulate matter less than ten microns in diameter (PM10) from this unit shall be limited to 0.003 lbs/MMBtu and 0.0045 lbs/hr. In addition, this unit shall fire natural gas only.

D.13.2 Sulfur Dioxide (SO<sub>2</sub>)

Pursuant to 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations), subsection (b), this unit is limited to sulfur dioxide emissions of 0.3 lbs/MMBtu. However, 326 IAC 6-1-10.1(h) requires natural gas combustion only. Thus, the more stringent limitation for SO<sub>2</sub> emissions inherent with natural gas combustion is the allowable.

**Compliance Determination Requirements**

D.13.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, if testing is required, compliance with the (PM10) limit specified in Condition D.13.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.13.4 Record Keeping and Reporting Requirements

There are no record keeping and reporting requirements for this facility.

**SECTION D.14 FACILITY OPERATION CONDITIONS – Insignificant Activity**

**Facility Description [326 IAC 2-7-5(15)]:** Pangborn Shot Peener (Unit No. 3-1804) used to clean scale and rust from coil springs using steel shots. Particulate emissions are controlled by a baghouse (No. 3-3017).

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

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

D.14.1 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (d), emissions of particulate matter less than ten microns in diameter (PM10) from this unit shall be limited to 0.011 lbs/ton and 0.06 lbs/hr.

D.14.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

**Compliance Determination Requirements**

D.14.3 Particulate Matter (PM)

Pursuant to 326 IAC 2-7-6 and in order to comply with D.14.1, the Baghouse (Unit ID 3-3017) for PM control shall be in operation and control emissions from this facility at all times when the Pangborn Shot Peener is in operation.

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

D.14.4 Visible Emissions Notations

- (a) Visible emission notations of the Baghouse (Unit ID 3-3017) stack exhaust shall be performed at least once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

D.14.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Pangborn Shot Peener at least once per shift when the Pangborn Shot Peener is in operation. When for any one reading, the

pressure drop across the baghouse is outside the normal range of 0.1 and 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside of the above mentioned range for any one reading is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

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

#### D.14.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

#### D.14.7 Record Keeping Requirements

- (a) To document compliance with Condition D.14.4, the Permittee shall maintain records of visible emission notations of the Baghouse (Unit ID 3-3017) stack exhaust.
- (b) To document compliance with Condition D.14.5, the Permittee shall maintain the following:
  - (1) Records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle operation.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**SECTION D.15 FACILITY OPERATION CONDITIONS – Insignificant Activity**

**Facility Description [326 IAC 2-7-5(15)]:** Three (3) Wheelabrator Shot Peeners. Wheelabrator Shot Peeners (No. 3-1811, 3-1821, and 3-1823) are used to clean scale and rust from coil springs using steel shots. Each unit is controlled by a baghouse (No. 3-1811, 3-3022, and 3-1823, respectively).

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

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

D.15.1 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (d), emissions of particulate matter less than ten microns in diameter (PM10) from each unit shall be limited to the following:

Unit No. 3-1811: 0.018 lbs/ton and 0.06 lbs/hr  
Unit No. 3-1821: 0.016 lbs/ton and 0.06 lbs/hr  
Unit No. 3-1823: 0.016 lbs/ton and 0.06 lbs/hr

D.15.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

**Compliance Determination Requirements**

D.15.3 Particulate Matter (PM)

Pursuant to 326 IAC 2-7-6 and in order to comply with D.15.1, the Baghouses (Unit IDs 3-1811, 3-3022, and 3-1823) for PM control shall be in operation and control emissions from this facility at all times when any of the Wheelabrator Shot Peeners is in operation.

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

D.15.4 Visible Emissions Notations

- (a) Visible emission notations of the Baghouse (Unit IDs 3-1811, 3-3022, and 3-1823) stack exhaust shall be performed at least once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

D.15.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Wheelabrator Shot Peeners at least once per shift when any one of the Wheelabrator Shot Peeners is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.1 and 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside of the above mentioned range for any one reading is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

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

D.15.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

D.15.7 Record Keeping Requirements

- (a) To document compliance with Condition D.15.4, the Permittee shall maintain records of visible emission notations of the Baghouse (Unit IDs 3-1811, 3-3022, and 3-1823) stack exhaust.
- (b) To document compliance with Condition D.15.5, the Permittee shall maintain the following:
  - (1) Records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle operation.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

and

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: ASF-Keystone, Inc. – Hammond Plant  
Source Address: 4831 Hohman Avenue  
Hammond, Indiana 46327  
Mailing Address: 1700 Walnut Street  
Granite City, Illinois 62040-3100  
Part 70 Permit No.: **T089-8273-00204**

**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)

\_\_\_\_\_ 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.

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**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
AIR POLLUTION CONTROL DIVISION  
5925 Calumet Avenue  
Hammond, Indiana 46320  
Phone: 219-853-6306  
Fax: 219-853-6343**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: ASF-Keystone, Inc. – Hammond Plant  
Source Address: 4831 Hohman Avenue  
Hammond, Indiana 46327  
Mailing Address: 1700 Walnut Street  
Granite City, Illinois 62040-3100  
Part 70 Permit No.: **T089-8273-00204**

**This form consists of 2 pages**

**Page 1 of 2**

<p>___ This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><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) 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**

and

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

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

Source Name: ASF-Keystone, Inc. – Hammond Plant  
Source Address: 4831 Hohman Avenue  
Hammond, Indiana 46327  
Mailing Address: 1700 Walnut Street  
Granite City, Illinois 62040-3100  
Part 70 Permit No.: **T089-8273-00204**

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

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. 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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<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(s) of Deviation:</b>	
<b>Response Step(s) 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(s) of Deviation:</b>	
<b>Response Step(s) 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(s) of Deviation:</b>	
<b>Response Step(s) 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(s) of Deviation:</b>	
<b>Response Step(s) 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(s) of Deviation:</b>	
<b>Response Step(s) 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  
COMPLIANCE DATA SECTION**

and

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

**PART 70 OPERATING PERMIT  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: ASF-Keystone, Inc. – Hammond Plant  
Source Address: 4831 Hohman Avenue  
Hammond, Indiana 46327  
Mailing Address: 1700 Walnut Street  
Granite City, Illinois 62040-3100  
Part 70 Permit No.: **T089-8273-00204**

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

Report period  
Beginning: \_\_\_\_\_  
Ending: \_\_\_\_\_

<u>Boiler Affected</u>	<u>Alternate Fuel</u>	<u>Days burning alternate fuel</u>	<u>From</u>	<u>To</u>

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**

and

**Hammond Department of Environmental Management  
Air Pollution Control Division**

Technical Support Document (TSD) for an  
Administrative Amendment to a Part 70 Permit

Source Description and Location
---------------------------------

<b>Source Name:</b>	ASF – Keystone, Inc. – Hammond Plant
<b>Source Location:</b>	4831 Hohman Avenue, Hammond, IN 46327
<b>County:</b>	Lake
<b>SIC Code:</b>	3493 – Steel Springs
<b>Operation Permit No.:</b>	T089-8273-00204
<b>Operation Permit Issuance Date:</b>	July 29, 2002
<b>Administrative Amendment No.:</b>	089-24361-00204
<b>Permit Reviewer:</b>	Ronald Holder - HDEM

Existing Approvals
--------------------

The source was issued Part 70 Operating Permit No. T089-8273-00204 on July 29, 2002. The source has since received the following approvals:

- (a) Administrative Amendment No. 089-16102-00204, issued on October 25, 2002; and
- (b) Administrative Amendment No. 089-19447-00204, issued on September 1, 2004.

A timely application for a Part 70 permit renewal was received on October 27, 2006. The renewal application is still under review.

County Attainment Status
--------------------------

The source is located in Lake County.

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

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as moderate nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) 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.

- (c) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General’s Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA’s designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA’s guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Nonattainment NSR, 326 IAC 2-1.1-5.
- (d) Lake County has been classified as attainment or unclassifiable for PM10, 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.
- (e) 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.

**Source Status**

The table below summarizes the potential to emit of the entire source, prior to the proposed amendment, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	11
PM10	10
SO <sub>2</sub>	0.3
VOC	> 100
CO	20
NO <sub>x</sub>	52

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2) because no regulated attainment pollutant is emitted at a rate of two hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing source is a major stationary source under Emission Offset (326 IAC 2-3) because volatile organic compounds (VOC), a nonattainment regulated pollutant, is emitted at a rate greater than one hundred (100) tons per year.
- (c) These emissions are based upon the potential to emit as reported in the source’s 2005 emission statement and new data from the 2006 Part 70 renewal application.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed amendment, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
xylenes	0.1
toluene	0.1
benzene	0.1
others	0.2
TOTAL	0.5

This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Actual Emissions**

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

Pollutant	Actual Emissions (tons/year)
PM	1.82
PM10	1.60
SO <sub>2</sub>	0.04
VOC	17.89
CO	3.02
NO <sub>x</sub>	7.72
HAP	none reported

**Description of Proposed Modification**

The Office of Air Quality (OAQ) has reviewed an application for an amendment, submitted by ASF - Keystone, Inc. on February 22, 2007, relating to the installation of Vertical Opposing Disc Grinder 3-0396 and the permanent removal of Gardner Single End Grinder 3-0233. All nine (9) steel spring grinders vent to the existing ETA 2000 Pulse-Jet Baghouse. The following is the modified facility description including the unit IDs, descriptions, and maximum design rates after the addition of the new grinder and removal of the old one:

Nine (9) Steel Spring Grinders, with the following Unit IDs, Descriptions, and Maximum Design Rates, controlled by one (1) ETA 2000 Pulse-Jet Baghouse (3-3037) and exhausting to Stack 3.

Unit ID - Description	Maximum Design Rate (tons of spring per hour)
3-0386 - #2 Besly Ferris Wheel Grinder	1.66 for units 3-0386 and 3-0389 combined.
3-0389 - Gardner Tub Grinder	- - -
3-0385 - #1 Besly Ferris Wheel Grinder	1.47 for units 3-0385 and 3-0394 combined.
3-0394 - Besly Swing Grinder	- - -
3-0249 - Gardner Paddle Wheel Grinder	0.15
3-0247 – Torrington Ferris Wheel Grinder	0.91
3-0244 - #1 Matteson (Large) Grinder	4.31 for units 3-0244 and 3-0393 combined.
3-0393 - #2 Matteson (Small) Grinder	- - -
3-0396 – Vertical Opposing Disc Grinder	1.11

**Enforcement Issues**

There are no pending enforcement actions related to this amendment.

**Stack Summary**

The following existing stack information for the ETA 2000 Baghouse 3-3037 does not change.

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
3	Nine (9) Grinders	50	4	42800	77

**Emission Calculations**

See Appendix A of this document for detailed emission calculations (one (1) page).

**Permit Level Determination – Part 70**

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before and after controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)	
	before control	after control
PM	0.048	0.0005
PM10	0.022	0.0002
SO <sub>2</sub>	-	-
VOC	-	-
CO	-	-
NO <sub>x</sub>	-	-

The potential emissions are below the levels that would require a source modification under 326 IAC 2-7-10.5 and below the exemption levels specified in 326 IAC 2-1.1-3(e)(1). The new grinder will be incorporated into the Part 70 Operating Permit through an administrative amendment pursuant to 326 IAC 2-7-11.

**Permit Level Determination – PSD or Emission Offset**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 minor source modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Pb
Vertical Opposing Disc Grinder 3-0396	0.048	0.022	-	-	-	-	-
PSD and Emission Offset Significant Levels	25	15	40	40	100	40	0.6

The emission increases are less than the PSD and Emission Offset significant levels. Therefore, the requirements of PSD (326 IAC 2-2) and Emission Offset (326 IAC 2-3) do not apply.

Lake County has been designated as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled “Implementation of New Source Review Requirements in PM<sub>2.5</sub> Nonattainment Areas” authored by Steve Page, Director of OAQPS, until EPA promulgates the PM<sub>2.5</sub> major NSR regulations, states should assume that a major stationary source’s PM<sub>10</sub> emissions represent PM<sub>2.5</sub> emissions. IDEM will use the PM<sub>10</sub> nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM<sub>2.5</sub> NAAQS. A significant emissions increase would be a net emissions increase or the potential of fifteen (15) tons per year or greater of PM<sub>10</sub>.

### Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included due to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included due to this proposed modification.
- (c) 40 CFR 64.2, Compliance Assurance Monitoring (CAM), does not apply because the new grinder does not have a potential to emit before controls equal to or greater than the major source threshold for particulates matter (PM) or particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM10).

### State Rule Applicability Determination

The following state rules are applicable to the source due to the installation of the new grinder:

#### **326 IAC 2-2 and 2-3 (PSD and Emission Offset)**

PSD and Emission Offset do not apply and are discussed under the Permit Level Determination - PSD and Emission Offset section.

#### **326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County)**

Pursuant to 326 IAC 6.8-1-2, particulate matter emissions from the stack of the baghouse controlling emissions from the Vertical Opposing Disc Grinder 3-0396 shall not exceed 0.03 grain per dry standard foot (dscf).

The exhaust at the stack of the Pulse-Jet Baghouse 3-3037 is tested for the grinder emission limitations once per permit term. The exhaust at the stack of the baghouse will continue to be required to meet those standards and the 0.03 gr/dscf for the Vertical Opposing Disc Grinder.

### Compliance Determination and Monitoring Requirements

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

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

The new Vertical Opposing Disc Grinder 3-0396 will be subject to the compliance determination and compliance monitoring requirements of the existing grinders.

The Compliance Determination Requirements applicable to the grinders are as follows:

- (a) The Permittee shall perform a PM10 compliance test for the PM10 limitations of the grinders at the exhaust of the baghouse controlling the grinders, utilizing methods as approved by the commissioner. The Permittee shall also demonstrate compliance with the 0.03 gr/dscf limit for the new Vertical Opposing Disc Grinder. The testing shall be performed once during each permit term and shall be repeated within five (5) years of the date of the most recent valid compliance test.
- (b) The Pulse-Jet Baghouse 3-3097 for particulate control shall be in operation and control emissions from the grinders at all times when any of the grinders are in operation.

The Compliance Monitoring Requirements applicable to this modification are as follows:

- (a) Visible emission notations of the baghouse stack exhaust shall be performed at least once per day during normal daylight operations when the grinders are in operation.
- (b) The Permittee shall record the pressure drop across the baghouse used in conjunction with the grinders at least once per day when the grinders are in operation.
- (c) In the event that a bag failure has been observed, the failed unit and the associated process will be shut down immediately until the failed unit has been repaired or replaced.
- (d) The Permittee shall maintain records of the visible emissions notations and pressure drop readings for the baghouse.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County), 326 IAC 6.8-2 (Lake County: PM10 Emission Requirements), and 326 IAC 2-7 (Part 70).

### Proposed Changes:

The following changes were agreed to and made as an administrative amendment to the Part 70 permit. Deleted language appears as ~~strike-out~~ and new language appears in **bold**.

1. In Section A.1, General Information, the Responsible Official, which no longer needs to be referenced, was removed and the county status information was updated as follows. Also, the source requested, in their 2006 Part 70 renewal application currently being reviewed, that they be re-designated in Section A.1 as a Minor Source under Section 112 of the Clean Air Act. This is due to the fact that, in 2004, all of the HAP-containing coatings listed in the original application were replaced with HAP-free equivalents. This has been confirmed by the HDEM inspector.

Responsible Official: ~~John Worries, Jr., President~~  
Mailing Address: 1700 Walnut Street  
Granite City, Illinois 62040-3100  
Contact Person: ~~Robert Wille, Customer Service~~  
Source Address: 4831 Hohman Avenue  
Hammond, Indiana 46327  
SIC Code: 3493 – Steel Springs, except wire  
County Location: Lake  
County Status: ~~Attainment for CO and Lead~~  
~~Nonattainment for TSP, PM10, SO2, NO2, and Ozone~~  
**Nonattainment for PM2.5**  
**Nonattainment for ozone under the 8-hour standard**  
**Attainment for all other criteria pollutants**  
Source Status: Part 70 Permit Program  
Major Source under Emission Offset Rules;  
~~Major Source, Section 112 of the Clean Air Act~~  
Not 1 of 28 source categories listed under 326 IAC 2-2

2. In Section A.2, Emission Units and Pollution Control Equipment Summary, the unit descriptions for the nine (9) spring grinders were updated and simplified as follows to remove Unit 3-0233 and add Unit 3-0396:

The Grinder Unit IDs, as listed in the current original Part 70 permit, are not exactly the same as those in the Indiana PM10 rule 326 IAC 6.8-2-4, because, prior to the issuance of the original Part 70 permit, tub grinder 3-0388 was removed in 1996 and coil spring grinder 3-0295 was replaced by coil spring grinder 3-0394 in year 2000. These are the descriptions as they exist today.

- (3) Nine (9) Spring Grinders

This system includes the following grinders:

Unit ID	Unit Description	Maximum Design Rate (Tons of springs ground per hour)
<del>Unit 3-0386</del>	#2 Besly Ferris Wheel Grinder	1.6555 (for both Units 3-0386 & 3-0389, combined) <b>1.66 for units 3-0386 and 3-0389 combined.</b>
<del>Unit 3-0389</del>	Gardner Tub Grinder	1.6555 (for both Units 3-0386 & 3-0389, combined)
<del>Unit 3-0385</del>	#1 Besly Ferris Wheel Grinder	2.2035 (for Units 3-0385, 3-0394, & 3-0233, combined) <b>1.47 for units 3-0385 and 3-0394 combined.</b>
<del>Unit 3-0394</del>	Besly Swing Grinder	2.2035 (for Units 3-0385, 3-0394, & 3-0233, combined)
<del>Unit 3-0233</del>	Gardner Single End Grinder	2.2035 (for Units 3-0385, 3-0394, & 3-0233, combined)
<del>Unit 3-0249</del>	Gardner Paddle Wheel Grinder	0.1545 <b>0.15</b>
<del>Unit 3-0247</del>	Torrington Ferris Wheel Grinder	0.909 <b>0.91</b>
<del>Unit 3-0244</del>	#1 Mattison (Large) Grinder	4.309 (for both Units 3-0244 & 3-0393, combined) <b>4.31 for units 3-0244 and 3-0393 combined.</b>
<del>Unit 3-0393</del>	#2 Mattison (Small) Grinder	4.309 (for both Units 3-0244 & 3-0393, combined)
<b>3-0396</b>	<b>Vertical Opposing Disc Grinder</b>	<b>1.11</b>

3. In the B and C sections of the permit, the zip codes have been updated and specific mail codes (MC) for each of the IDEM branches have been added to IDEM's addresses as follows:

Permits Branch: 100 North Senate Avenue, P. O. Box 6045  
**MC 61-53 IGCN 1003**  
 Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

Compliance Branch: 100 North Senate Avenue, P. O. Box 6045  
**MC 61-53 IGCN 1003**  
 Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

Asbestos Section: 100 North Senate Avenue, P. O. Box 6045  
**MC 61-52 IGCN 1003**  
 Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

Technical Support and Modeling: 100 North Senate Avenue, P. O. Box 6045  
**MC 61-50 IGCN 1003**  
 Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

4. In Section D.3, the facility description box of was amended and simplified as follows to add the new grinder 3-0396 and remove grinder 3-0233:

The Grinder Unit IDs, as listed in the current original Part 70 permit, are not exactly the same as those in the Indiana PM10 rule 326 IAC 6.8-2-4, because, prior to the issuance of the original Part 70 permit, tub grinder 3-0388 was removed in 1996 and coil spring grinder 3-0295 was replaced by coil spring grinder 3-0394 in year 2000. These are the descriptions as they exist today.

**Facility Description [326 IAC 2-7-5(15)]:** Nine (9) Spring Grinders including the following grinders all with the following Unit IDs, Descriptions, and Maximum Design Rates, controlled by one (1) ETA 2000 Pulse-jet baghouse (Unit No. 3-3037) and exhausting to Stack 3.

Unit ID	Unit Description	Maximum Design Rate (Tons of springs ground per hour)
Unit 3-0386	#2 Besly Ferris Wheel Grinder	1.6555 (for both Units 3-0386 & 3-0389, combined) <b>1.66 for units 3-0386 and 3-0389 combined.</b>
Unit 3-0389	Gardner Tub Grinder	"" "" - - -
Unit 3-0385	#1 Besly Ferris Wheel Grinder	2.2035 (for Units 3-0385, 3-0394, & 3-0233, combined) <b>1.47 for units 3-0385 and 3-0394 combined</b>
Unit 3-0394	Besly Swing Grinder	"" "" - - -
Unit 3-0233	Gardner Single-End Grinder	"" ""
Unit 3-0249	Gardner Paddle Wheel Grinder	0.1545 <b>0.15</b>
Unit 3-0247	Torrington Ferris Wheel Grinder	0.909 <b>0.91</b>
Unit 3-0244	#1 Mattison (Large) Grinder	4.309 (for both Units 3-0244 & 3-0393, combined) <b>4.31 for units 3-0244 and 3-0393 combined</b>
Unit 3-0393	#2 Mattison (Small) Grinder	"" "" - - -
<b>3-0396</b>	<b>Vertical Opposing Disc Grinder</b>	<b>1.11</b>

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

5. In Section D.3, Condition D.3.1, an emission limit for the new grinder, has been added as follows:

**D.3.1 Particulate Matter Limitations for Lake County [326 IAC 6.8]**

Pursuant to 326 IAC 6.8-1-2, particulate matter emissions from the stack of the baghouse controlling emissions from the Vertical Opposing Disc Grinder 3-0396 shall not exceed 0.03 grain per dry standard cubic foot (dscf).

The remaining conditions and references to conditions in Section D.3 were renumbered due to the addition of this condition.

6. In Condition D.3.1 (now D.3.2), the rule cite has been updated and grinder 3-0233 has been removed as follows. Also the total, which is not part of the rule, has been removed.

Grinders 3-0394 and 3-0393 are also removed because they are not actually in the rule.

~~D.3.1~~ **D.3.2 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-2-4]**

Pursuant to ~~326 IAC 6-1-10.1~~ **326 IAC 6.8-2-4** (Lake County PM10 Emission Requirements), subsection (d), emissions of particulate matter less than ten microns in diameter (PM10) from the ~~nine (9)~~ **following** Spring Grinders shall be limited to the following:

Unit ID	PM10 Emission Limit (lbs/ton)	PM10 Emission Limit (lbs/hr)
<del>Unit 3-0386</del>	1.083	0.045
<del>Unit 3-0389</del>	(Combined limit for Units 3-0386 & 3-0389)	
<del>Unit 3-0385</del>	0.019	0.05
<del>Unit 3-0394</del>	(for each Unit 3-0385, 3-0394, & 3-0233)	
<del>Unit 3-0233</del>	(for each Unit 3-0385, 3-0394, & 3-0233)	
<del>Unit 3-0249</del>	3.792	1.82
<del>Unit 3-0247</del>	0.019	0.03
<del>Unit 3-0244</del>	0.021	0.040
<del>Unit 3-0393</del>	(Combined limit for Units 3-0244 & 3-0393)	
<del>Total:</del>	<del>5.043 lbs/ton</del>	<del>2.085 lbs/hr</del>

7. In Condition D.3.3 (now D.3.4), since all the grinders exhaust to the same baghouse and stack, the testing requirement has been modified as follows to allow for separate or simultaneous compliance demonstrations for the PM and PM10 limits. The sentence “~~PM-10 includes filterable and condensable PM-10.~~” does not apply in this situation and was removed because the specific PM10 limits in the rule were originally developed from filterable particulate information.

~~D.3.3~~ **D.3.4** Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Condition **D.3.1** and D.3.2, the Permittee shall perform **PM and PM-10** testing utilizing methods as approved by the Commissioner. **A demonstration of compliance with the PM-10 limits in D.3.2 may be used to demonstrate compliance with the PM limit in D.3.1, provided the required methods and test protocols are pre-approved for that purpose by the Commissioner.** This testing shall be repeated at least once every five (5) years from the date of ~~this~~ **the most recent** valid compliance demonstration. ~~PM-10 includes filterable and condensable PM-10.~~ Testing shall be conducted in accordance with Section C – Performance Testing.

8. Condition D.3.4 (now D.3.5) was updated as follows due to the addition of Condition D.3.1.

~~D.3.4~~ **D.3.5** Particulate Matter (PM)

Pursuant to 326 IAC 2-7-6 and in order to comply with D.3.1 and **D.3.2**, the Baghouse (~~Unit ID 3-3037~~) for PM control shall be in operation and control emissions ~~from this facility~~ at all times when any of the ~~nine~~ grinders ~~is~~ **are** in operation.

9. In the Emergency Occurrence Report form at the end of the permit, the IDEM, OAQ Compliance Branch information has been corrected to add the mail code and update the zip code and telephone numbers.

**COMPLIANCE BRANCH**  
 P.O. Box 6045  
 100 North Senate Avenue  
**MC 61-53 IGCN 1003**  
 Indianapolis, Indiana ~~46206-6045~~ **46204-2251**  
 Phone: 317-233-5674 **0178**  
 Fax: 317-233-5967 **6865**

\_\_\_ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674 **0178**, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967 **6865**), and follow the other requirements of 326 IAC 2- 7-16.

**Conclusion and Recommendation**

The installation and operation of the new grinder shall be subject to the conditions of the attached proposed Part 70 Administrative Amendment 089-24361-00204. The staff recommends to the Commissioner that this Part 70 Administrative Amendment be approved.

**Vertical Opposing Disc Grinder 3-0396**

**AA 089-24361-00204**

**Appendix A**  
calculations

**ASF - Keystone, Inc. - Hammond Plant**  
4831 Hohman Avenue, Hammond, IN 46327

Calculations By: Ronald Holder

**\*\*NOTES\*\***

EF: EMISSION FACTOR  
CE: CONTROL EFFICIENCY

MDR: MAXIMUM DESIGN RATE  
MDC: MAXIMUM DESIGN CAPACITY

Ts: STACK DISCHARGE TEMPERATURE  
UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

**Vertical Opposing Disc Grinder 3-0396**

CNTRL DEV: Baghouse (Unit ID: 3-3037)

MDR (T/hr): 1.1  
YEARLY PROD (T/yr): NA

STACK ID (DIAM:HEIGHT): (4' : 50')  
FLOWRATE (ACFM): 42800  
Ts(°F): 77

PERMITTED OPERATING HRS: **8760** hr/yr

SCC NO. 3-03-009-12			POTENTIAL EMISSIONS					
POLLUTANT	EF(lbs/Ton)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0.01	99	0.011	0.264	<b>0.048</b>	0.0001	<b>0.0005</b>	0.0000
PM10	0.0045	99	0.005	0.119	<b>0.022</b>	0.0000	<b>0.0002</b>	0.0000
SOx	0	0	0	0	0	0	0	N/A
NOx	0	0	0	0	0	0	0	N/A
VOC	0	0	0	0	0	0	0	N/A
CO	0	0	0	0	0	0	0	N/A
HAPs	0	0	0	0	0	0	0	N/A

Vented to existing baghouse 3-3037.

Insignificant Activity per 326 IAC 2-7-1(21)(A),

Potential uncontrolled emissions below the exemption levels specified in 326 IAC 2-1.1-3(e)(1).

Potential to emit below the levels that would require a source modification under 326 IAC 2-7-10.5.

The EPA has designated Lake County as nonattainment for PM2.5. The IDEM, OAQ is, therefore, following the EPA's guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Nonattainment New Source Review NSR, 326 IAC 2-1.1-5 (see TSD).