



Thomas M. McDermott, Jr.
Mayor

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

CITY OF HAMMOND

RONALD L. NOVAK
Director

New Source Review and Federally Enforceable State Operating Permit (FESOP) Renewal

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

and

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

**HT Aluminum Specialties, Inc.
6340 Indianapolis Blvd.
Hammond, Indiana 46320**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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

Operation Permit No.: F089-24737-00207	
Issued by: Original signed by:	Issuance Date: September 26, 2007
Ronald L. Novak, Director Hammond Department of Environmental Management	Expiration Date: September 26, 2012

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates an Aluminum Scrap and Waste Processing Plant.

Source Address:	6340 Indianapolis Blvd., Hammond, IN 46320
Mailing Address:	6340 Indianapolis Blvd., Hammond, IN 46320
General Source Phone Number:	219-931-1927
SIC Code:	5093
County Location:	Lake
Source Location Status:	Nonattainment for PM _{2.5} Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

Aluminum Dross Finishing Operation, identified as Line #2, with a maximum capacity of 6.55 tons per hour (shredding, screening), modified in 1992, using American Air Filter Dust Collector #3 (AAF #3) as control, and exhausting to Stack 1.

Aluminum Dross and Chips Unloading to Elevated Storage Silo Operation, with a maximum capacity of 6.35 tons per hour (unloading, screening), modified in 1992, using American Air Fabric Filter #1 (AAF #1) as control, and exhausting to Stack 4.

Aluminum Bulk Processing Operation, identified as Line #1, with a maximum capacity of 6.55 tons per hour (shaking, mixing, screening), modified in 1992, using a Pangborn Dust Collector as control, and exhausting to Stack 5.

Hog Operation, identified as The Hog, with a maximum capacity of 7.5 tons per hour (chip shredding), installed in 2006, using American Air Filter Dust Collector #1 (AAF #1) as control, and exhausting to Stack 4.

Briquetter Line, identified as the Briquetter, with a maximum capacity of 7.5 tons per hour (compressing aluminum material into briquettes), installed in 2006, using a Pangborn Dust Collector (PG-5) as control, and exhausting to Stack PG-5.

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

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Aluminum Sorting Lines, including conveying, manual sorting, Rotex 43 Shaker Table, and cross belt magnet separation.
- (b) Miscellaneous shredders used for breaking up bales of aluminum and pallets of wood, including the Saturn Shredder and Ring Mill.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers:
 - 1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - 2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (h) Closed loop heating and cooling systems.
- (i) Gasoline emergency generators not exceeding 100 horsepower.
- (j) A laboratory as defined in 326 IAC 2-7-1(20)(D).

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F089-24737-00207, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ and HDEM, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and HDEM copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

B.9 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15th 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, IN 46320

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;

- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts, as specified in Sections D of this permit, 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

Telephone 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
Hammond Department of Environmental Management
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, IN 46320

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or

contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ and HDEM may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) All terms and conditions of permits established prior to F089-24737-00207 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

- (a) The application for renewal shall be submitted using the application form or forms

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

Request for renewal shall be submitted to:

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

and

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

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

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

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

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

and

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

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the

applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-3]

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable;
 - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period;
 - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.6 Fugitive Dust Emissions [326 IAC 6.8-10-3]

Pursuant to 326 IAC 6.8-10-3 (formerly 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 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

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

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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

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

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

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

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment

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

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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, IN 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

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

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.16 Annual Emission Inventory [Hammond Ordinance 7102]

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

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

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner 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.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

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

and

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and HDEM. The general public may request this information from the IDEM, OAQ and HDEM under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Aluminum Scrap and Waste Processing Plant.

Aluminum Dross Finishing Operation, identified as Line #2, with a maximum capacity of 6.55 tons per hour (shredding, screening), modified in 1992, using American Air Filter Dust Collector #3 (AAF #3) as control, and exhausting to Stack 1.

Aluminum Dross and Chips Unloading to Elevated Storage Silo Operation, with a maximum capacity of 6.35 tons per hour (unloading, screening), modified in 1992, using American Air Fabric Filter #1 (AAF #1) as control, and exhausting to Stack 4.

Aluminum Bulk Processing Operation, identified as Line #1, with a maximum capacity of 6.55 tons per hour (shaking, mixing, screening), modified in 1992, using a Pangborn Dust Collector as control, and exhausting to Stack 5.

Hog Operation, identified as The Hog, with a maximum capacity of 7.5 tons per hour (chip shredding), installed in 2006, using American Air Filter Dust Collector #1 (AAF #1) as control, and exhausting to Stack 4.

Briquetter Line, identified as the Briquetter, with a maximum capacity of 7.5 tons per hour (compressing aluminum material into briquettes), installed in 2006, using a Pangborn Dust Collector (PG-5) as control, and exhausting to Stack PG-5.

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

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

D.1.1 Particulate Matter (PM) and Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6.8-1-2] [326 IAC 2-2] [326 IAC 2-7]

Pursuant to 326 IAC 6.8-1-2, emissions of particulate matter (PM) and particulate matter less than 10 microns in diameter (PM10) shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf) and the following equivalent limitations in pounds per hour. Compliance with the pounds per hour limits in the following table will also render 326 IAC 2-2 and 326 IAC 2-7 not applicable.

Unit ID:	PM and PM10 Emissions Limit	
	(gr/dscf)	(lbs/hr)
Aluminum Dross Finishing Operation (Line #2)	0.03	6.17
Aluminum Dross and Chips Unloading to Elevated Storage Silo Operation and Hog Operation	0.03	4.98
Aluminum Bulk Processing Operation (Line #1)	0.03	3.31
Briquetter Line	0.03	2.57

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements [326 IAC 2-8-4]

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM and PM10 testing on the Aluminum Dross and Chips Unloading to Elevated Storage Silo Operation and Hog Operation, at the exhaust of the dust collector controlling those units, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C – Performance Testing.

D.1.4 Particulate Matter (PM) and Particulate Matter less than 10 microns in diameter (PM10)

- (a) In order to comply with D.1.1, the baghouse dust collectors for PM and PM10 control shall be in operation and control emissions from the Aluminum Scrap and Waste Processing emission units at all times that the processes are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed and before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.5 Visible Emissions Notations

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

D.1.6 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across each baghouse used in conjunction with the Aluminum Scrap and Waste Processing units at least once per day when the processes are in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line or emissions unit. 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).

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

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of the baghouse stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a daily record of the baghouse pressure drop readings. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain a record of the pressure gauge calibrations.
- (d) 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-**

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

Source Name: **HT Aluminum Specialties, Inc.**
Source Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
Mailing Address: same
FESOP No.: **F089-24737-00207**

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204
Phone: 317-233-0178
Fax: 317-233-6865**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320
Phone: 219-853-6306
Fax: 219-853-6343**

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

Source Name: **HT Aluminum Specialties, Inc.**
Source Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
Mailing Address: same
FESOP No.: **F089-24737-00207**

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ) and HDEM, within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

and

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

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

Source Name: **HT Aluminum Specialties, Inc.**
Source Address: 6340 Indianapolis Boulevard, Hammond, Indiana 46320
Mailing Address: same
FESOP No.: **F089-24737-00207**

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

and

Hammond Department of Environmental Management Air Pollution Control Division

Technical Support Document (TSD) for a New Source Review and
Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	HT Aluminum Specialties, Inc.
Source Location:	6340 Indianapolis Blvd., Hammond, IN 46320
County:	Lake
SIC Code:	5093 – Scrap and Waste Materials
Permit Renewal No.:	F089-24737-00207
Permit Reviewer:	Ronald Holder, HDEM

The Hammond Department of Environmental Management (HDEM) has reviewed the operating permit renewal application from HT Aluminum Specialties, Inc. relating to the operation of an Aluminum Scrap and Waste Processing Plant.

History

On May 7, 2007, HT Aluminum Specialties, Inc. submitted an application to the HDEM requesting to renew its operating permit. HT Aluminum Specialties, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) (F089-7823-00207) on June 17, 1997. This is the second renewal for this source. The first renewal (F089-14952-00207) was issued on February 4, 2003.

Permitted Emission Units and Pollution Control Equipment

- (a) Aluminum Dross Finishing Operation, identified as Line #2, with a maximum capacity of 6.55 tons per hour (shredding, screening), modified in 1992, using American Air Filter Dust Collector #3 (AAF #3) as control, and exhausting to Stack 1.
- (b) Aluminum Dross and Chips Unloading to Elevated Storage Silo Operation, with a maximum capacity of 6.35 tons per hour (unloading, screening), modified in 1992, using American Air Fabric Filter #1 (AAF #1) as control, and exhausting to Stack 4.
- (c) Aluminum Bulk Processing Operation, identified as Line #1, with a maximum capacity of 6.55 tons per hour (shaking, mixing, screening), modified in 1992, using a Pangborn Dust Collector as control, and exhausting to Stack 5.

Emission Units and Pollution Control Equipment Constructed and Operated without a Permit

The source also consists of the following emission units that have been installed or constructed and have been operating without a permit:

- (a) Hog Operation, identified as The Hog, with a maximum capacity of 7.5 tons per hour (chip shredding), installed in 2006, using American Air Filter Dust Collector #1 (AAF #1) as control, and exhausting to Stack 4.

The Hog will be added to the permit as part of the above Aluminum Dross and Chips Unloading to Elevated Storage Silo Operation. It will share the existing American Air Filter Dust Collector #1 (AAF #1) and the emission limit at the exhaust of Stack 4 will remain the same.

- (b) Briquetter Line, identified as the Briquetter, with a maximum capacity of 7.5 tons per hour (compressing aluminum material into briquettes), installed in 2006, using a Pangborn Dust Collector (PG-5) as control, and exhausting to Stack PG-5.

The Briquetter is a new emission unit.

- (c) Rotex 43 Shaker Table, with a maximum capacity 6.0 tons per hour (shaking and screening), installed in 2006, using no controls and no stack.

The Rotex Shaker Table is an insignificant activity that will be added to the existing list of insignificant activities which includes manual sorting, shaking, separation, and screening.

- (d) Ring Mill - Saturn Shredder Operation, with a maximum capacity of 8.0 tons per hour (shredding and size reduction), installed in 2006, using no controls and no stack.

The Saturn Shredder/Ring Mill is an insignificant activity that will be added to the existing list of insignificant activities which includes manual sorting, shaking, separation, and screening.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Aluminum Sorting Lines, including conveying, manual sorting, Rotex 43 Shaker Table, and cross belt magnet separation.
- (b) Miscellaneous shredders used for breaking up bales of aluminum and pallets of wood, including the Saturn Shredder and Ring Mill.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers:
 - 1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - 2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

- (f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (h) Closed loop heating and cooling systems.
- (i) Gasoline emergency generators not exceeding 100 horsepower.
- (j) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

Since the issuance of the first FESOP renewal (F089-14952-00207) on February 4, 2003, the source has constructed or has been operating under the following approvals as well:

Administrative Amendment 089-19042-00207 issued on June 15, 2004.

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

Enforcement Issue

IDEM and HDEM are aware that equipment has been constructed (and/or operated) prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Emission Units and Pollution Control Equipment Constructed and Operated without a Permit".

IDEM and HDEM are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

There are no other current enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temp (°F)
Stack 1	Aluminum Dross Finishing Operation	7	2.2	24000	Ambient
Stack 4	Aluminum Dross and Chips Unloading to Elevated Storage Silo Operation and Hog Operation	8	3.4	19380	Ambient
Stack 5	Aluminum Bulk Processing Operation	12	2.0	12879	Ambient
Stack PG-5	Briquetter Line	30	2.0	10000	Ambient

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Lake County

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Nonattainment
SO ₂	Attainment
NO _x	Attainment
8-hour Ozone	Moderate Nonattainment
CO	Attainment
Lead	Attainment

- (a) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM_{2.5}. 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 non-attainment 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 PM_{2.5} emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to the ozone. Lake County has been designated as moderate nonattainment for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (c) Lake County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO_x, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (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 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	> 250
PM-10	> 100
SO ₂	-
VOC	-
CO	-
NO _x	-

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of particulate matter (PM) and particulate matter less than ten (10) microns in diameter (PM10) is equal to or greater than 250 tons per year and 100 tons per year, respectively. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM and PM10 emissions to less than PSD major source and Title V major source thresholds, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

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 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 HDEM emission data.

Pollutant	Emissions (tons/yr)
PM	0.97
PM-10	0.97
SO ₂	-
VOC	-
CO	-
NO _x	-
HAPs	-

Potential to Emit After Issuance

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

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Aluminum Dross Finishing Operation	1.02	1.02	-	-	-	-	-
Aluminum Dross and Chips Unloading to Silo	0.73	0.73	-	-	-	-	-
Hog Operation	0.18	0.18	-	-	-	-	-
Aluminum Bulk Processing Operation	3.94	3.94	-	-	-	-	-
Briquetter Line	0.87	0.87	-	-	-	-	-
Aluminum Sort Lines	1.58	1.58	-	-	-	-	-
Saturn Shredder-Ring Mill	1.05	1.05	-	-	-	-	-
Total Emissions	9.37	9.37	-	-	-	-	-

- (a) This existing stationary source is not major for PSD because the emissions of each regulated attainment pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Emission Offset because the emissions of the nonattainment pollutants PM10 (as a surrogate for PM2.5), VOC, and NOx are less than one hundred (<100) tons per year.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit renewal.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on April 18, 1997. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

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

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

326 IAC 2-3 (Emission Offset)

This existing stationary source is not major for Emission Offset because the emissions of the nonattainment pollutants PM10 (as a surrogate for PM2.5), VOC, and NOx are less than one hundred (<100) tons per year.

326 IAC 2-8-4 (Federally Enforceable State Operating Permit (FESOP))

Pursuant to 326 IAC 2-8-4 (Federally Enforceable State Operating Permit (FESOP)), this source has agreed to limit their PM and PM10 emissions to less than the the Part 70 major source thresholds. Therefore 326 IAC 2-7, Part 70 Permit Program does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Lake County and the potential to emit of volatile organic compounds (VOC) is less than twenty-five (25) tons per year. Therefore, 326 IAC 2-6 does not apply.

However, pursuant to the Hammond Ordinance No. 7102, the source will be required to submit an annual emission inventory containing the production information necessary to determine compliance and confirm the source classification and permit level. The emission inventory must be received by April 15th of each year. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. This is a local requirement only.

326 IAC 5-1 (Opacity Limitations)

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

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to this rule, fugitive particulate matter emissions shall not visibly escape beyond the property lines of the source.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this Aluminum Dross Finishing Operation will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6.8-1-2 (Particulate Emission Limitations)

Particulate matter emissions from facilities not otherwise limited by any other subsection of this rule shall not exceed 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (gr/dscf)). All particulate matter (PM) is assumed to be less than ten (10) microns in diameter (PM10) unless otherwise demonstrated by the source. Therefore, the PM10 emissions are also limited to 0.03 grain per dry standard cubic foot (gr/dscf).

The corresponding fabric air filters, baghouses, or dust collectors shall be in operation at all times the facilities are in operation, in order to comply with this limit.

326 IAC 8 (Volatile Organic Compound Rule)

There are no sources of volatile organic compound (VOC) emissions at this source.

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 Compliance Determination Requirements applicable to this modification are as follows:

Particulate matter compliance testing was performed for the Aluminum Dross Finishing Operation (Line #2) in 2002 and for the Aluminum Bulk Dross Processing Operation (Line #1) in 2005. The results for both performance tests were measured at less than 10% of their respective limits.

- (a) Because of the addition of the Hog Operation to the Aluminum Dross and Chips Unloading to Elevated Silo Operation, the Permittee shall perform particulate matter (PM) compliance testing at the exhaust of the American Air Fabric Filter #1 (AAF #1) with all associated processes operating at 95% or more of their respective maximum rates.
- (b) The fabric air filters, baghouses, and dust collectors for particulate control shall be in operation and control emissions at all times the facilities are in operation.

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

- (a) Visible emission notations of the baghouse stack exhausts shall be performed at least once per day during normal daylight operations when the facilities are in operation.
- (b) The Permittee shall record the pressure drop across each baghouse used in conjunction with the emission units at least once per day when the facilities 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 baghouses.

These monitoring conditions are necessary because the baghouses for the Aluminum Dross Finishing Operations must operate properly to ensure compliance with 326 IAC 6.8-1-2 (Particulate Emission Limitations) and 326 IAC 2-8 (FESOP).

Recommendation

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

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

An application for the purposes of this review was received on May 7, 2007. Additional information was received on June 6, 2007.

Conclusion

The operation of this **Aluminum Scrap and Waste Processing Plant** shall be subject to the conditions of the attached **New Source Review and FESOP Renewal F089-24737-00207**.

Indiana Department of Environmental Management Office of Air Quality

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

Source Name:	HT Aluminum Specialties, Inc.
Source Location:	6340 Indianapolis Blvd., Hammond, Indiana 46320
County:	Lake County
SIC Code:	5093 – Scrap and Waste Materials
Permit Renewal No.:	F089-24737-00207
Permit Reviewer:	Ronald Holder, HDEM

On August 18, 2007, the Hammond Department of Environmental Management (HDEM) had a notice published in the Hammond Times, Hammond, Indiana, stating that HT Aluminum Specialties, Inc. had applied for a renewal of their Federally Enforceable State Operating Permit (FESOP). The notice also stated that HDEM proposed to issue the FESOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The OAQ prefers that the Technical Support Document (TSD) reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comments were received during the 30-day comment period and the following revisions were made to the permit (**bolded** language has been added, the language with a ~~line through~~ it has been deleted).

The following decision necessitates a change to the permit.

On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

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Due to the above decision, Condition C.1, Overall Source Limit in was corrected as follows:

C.1 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-3]

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than ~~one hundred (100)~~ **twenty-five (25)** tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable;

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In Condition C.18 General Reporting Requirements, section (f), the (c) was removed as follows because there is no (c) in the referred to condition:

- (f) The Permittee shall make the information required to be documented and maintained in accordance with ~~(c)~~ Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and HDEM. The general public may request this information from the IDEM, OAQ and HDEM under 326 IAC 17.1.

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In order to be consistent with the Table of Contents, the rule cite [326 IAC 2-8-4] was added to the Compliance Determination Requirements heading at the top of the page as follows:

Compliance Determination Requirements [326 IAC 2-8-4]

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In Condition D.1.8, Record Keeping Requirements, a requirement to maintain a record of the biannual pressure gauge calibrations was added as follows:

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of the baghouse stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a daily record of the baghouse pressure drop readings. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (c) **To document compliance with Condition D.1.6, the Permittee shall maintain a record of the pressure gauge calibrations.**
- ~~(e)~~ (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

HT Aluminum Specialties, Inc.
 6340 Indianapolis Blvd.
 Hammond, IN 46320

HT Aluminum FESOP Renewal F089-24737-00207

Appendix A - Calculations

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

Aluminum Dross Finishing Operation
 (Mixing & Screening) (Line #2) (Stack 1)

MDR (T/hr): 6.55
 YEARLY PROD (T/yr): NA
 STACK ID (DIAM:HEIGHT): (2.22': 7')
 FLOWRATE (ACFM): 24000
 Ts(°F): 70

American Air Filter DC#3 (AAF#3)

Permitted operating hrs: **8760** hr/yr

SCC #3-04-001-60			POTENTIAL EMISSIONS						ALLOWABLE	
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	3.55	0.99	23.3	558.4	101.9	0.23	1.02	0.0011	6.17	27.03
PM10	3.55	0.99	23.3	558.4	101.9	0.23	1.02	0.0011	6.17	27.03
SOx	0	0	0	0	0	0	0	N/A	0	0
NOx	0	0	0	0	0	0	0	N/A	0	0
VOC	0	0	0	0	0	0	0	N/A	0	0
CO	0	0	0	0	0	0	0	N/A	0	0
LEAD	0	0	0	0	0	0	0	N/A	0	0

EF based on stack test performed on 6/12/02.
 EF = 0.228 lbs/hr/(1-0.99)/6.419 = 3.55 lb/ton.

PM: 326 IAC 6.8-1-2(a): 0.03 gr/dscf

Aluminum Dross and Chips Unloading to Elevated Storage Silo Operation (Stack 4)

MDR (T/hr): 6.35
 YEARLY PROD (T/yr): NA
 STACK ID (DIAM:HEIGHT): (3.43': 8')
 FLOWRATE (ACFM): 19380
 Ts(°F): 70

American Air Fabric Filter#1 (AAF#1)

Permitted operating hrs: **8760** hr/yr

SCC #3-05-011-07			POTENTIAL EMISSIONS						ALLOWABLE	
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	2.64	0.99	16.8	402.1	73.4	0.17	0.73	0.0010	4.98	21.83
PM10	2.64	0.99	16.8	402.1	73.4	0.17	0.73	0.0010	4.98	21.83
SOx	0	0	0	0	0	0	0	N/A	0	0
NOx	0	0	0	0	0	0	0	N/A	0	0
VOC	0	0	0	0	0	0	0	N/A	0	0
CO	0	0	0	0	0	0	0	N/A	0	0
LEAD	0	0	0	0	0	0	0	N/A	0	0

EF based on stack test performed on 6/12/02.
 EF = 0.162 lbs/hr/(1-0.99)/6.14 = 2.64 lb/ton.

PM: 326 IAC 6.8-1-2(a): 0.03 gr/dscf

Hog Operation
(shredding and size reduction) (Stack 4)

MDR (T/hr): 7.5
YEARLY PROD (T/yr): NA

STACK ID (DIAM:HEIGHT): (3.43': 8')
FLOWRATE (ACFM): 19380
Ts(°F): 70

American Air Fabric Filter#1 (AAF#1) Permitted operating hrs: **8760** hr/yr

SCC #3-04-001-60			POTENTIAL EMISSIONS						ALLOWABLE	
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	0.54	0.99	4.1	97.2	17.7	0.04	0.18	0.0002	limit is on the above stack	0
PM10	0.54	0.99	4.1	97.2	17.7	0.04	0.18	0.0002		
SOx	0	0	0	0	0	0	0	N/A	0	0
NOx	0	0	0	0	0	0	0	N/A	0	0
VOC	0	0	0	0	0	0	0	N/A	0	0
CO	0	0	0	0	0	0	0	N/A	0	0
LEAD	0	0	0	0	0	0	0	N/A	0	0

EF based on process knowledge from existing operations at HT Aluminum. PM: 326 IAC 6.8-1-2(a): 0.03 gr/dscf
This unit was added to the above Aluminum Dross and Chips Unloading Operation and will, therefore, share the baghouse and the emission limit.
The emission limit for the Aluminum Dross and Chips Unloading Operation and Hog Operation combined will be 0.03 gr/dscf equivalent to 4.98 lbs/hr.

Aluminum Bulk Processing Operation
(Mixing & Screening) (Line #1) (Stack 5)

MDR (T/hr): 6.55
YEARLY PROD (T/yr): NA

STACK ID (DIAM:HEIGHT): (2': 12')
FLOWRATE (ACFM): 12879
Ts(°F): 70

Pangborn Dust Collector Permitted operating hrs: **8760** hr/yr

SCC #3-04-001-60			POTENTIAL EMISSIONS						ALLOWABLE	
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	4.58	0.97	30.0	720.2	131.4	0.90	3.94	0.0082	3.31	14.51
PM10	4.58	0.97	30.0	720.2	131.4	0.90	3.94	0.0082	3.31	14.51
SOx	0	0	0	0	0	0	0	N/A	0	0
NOx	0	0	0	0	0	0	0	N/A	0	0
VOC	0	0	0	0	0	0	0	N/A	0	0
CO	0	0	0	0	0	0	0	N/A	0	0
LEAD	0	0	0	0	0	0	0	N/A	0	0

Stack Test 1/15/92: PM: 326 IAC 6.8-1-2(a): 0.03 gr/dscf
Avg. PM loading: baghouse inlet = 30.01 lbs/hr; baghouse outlet = 0.866 lbs/hr.
Avg. Dust Collector Efficiency was 97.01%.
Process Production during the stack test was 6.55 Tons/hr (42,580 lbs of dross during a 3 hour and 15 minute period).

E.F. = (30.01 lbs/hr) / (6.55 tons/hr) = 4.58 lbs/ton

Briquetter Line
compress aluminum scrap into briquettes (Stack PG-5)

MDR (T/hr): 7.5
YEARLY PROD (T/yr): NA

STACK ID (DIAM:HEIGHT): (2': 30')
FLOWRATE (ACFM): 10000
Ts(°F): 70

Pangborn Dust Collector (PG-5)

Permitted operating hrs: **8760** hr/yr

SCC #3-04-001-60			POTENTIAL EMISSIONS						ALLOWABLE	
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	2.66	0.99	19.95	478.8	87.4	0.20	0.87	0.0023	2.57	11.26
PM10	2.66	0.99	19.95	478.8	87.4	0.20	0.87	0.0023	2.57	11.26
SOx	0	0	0	0	0	0	0	N/A	0	0
NOx	0	0	0	0	0	0	0	N/A	0	0
VOC	0	0	0	0	0	0	0	N/A	0	0
CO	0	0	0	0	0	0	0	N/A	0	0
LEAD	0	0	0	0	0	0	0	N/A	0	0

EF based on process knowledge from existing operations at HT Aluminum.

PM: 326 IAC 6.8-1-2(a): 0.03 gr/dscf

The following items are designated as "Insignificant Activities" as defined in 326 IAC 2-7-1(21) because the potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1), less than five (5) tons per year of either particulate matter (PM) or particulate matter with an aerodynamic diameter less than ten (10) micrometers (PM10).

The emissions are quantified here and added to the plant total to assure compliance with the plantwide FESOP emissions limitations.

Aluminum Sorting Lines with Rotex 43 Shaker Table
manual sorting, shaking, and cross belt magnet

MDR (T/hr): 6

no control
no stack

Permitted operating hrs: **8760** hr/yr

SCC #3-04-001-60			POTENTIAL EMISSIONS					
POLLUTANT	*EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0.06	0	0.36	8.64	1.58	0.36	1.58	N/A
PM10	0.06	0	0.36	8.64	1.58	0.36	1.58	N/A

Ring Mill - Saturn Shredder Operation
shredding, size reduction

MDR (T/hr): 8

no control
no stack

Permitted operating hrs: **8760** hr/yr

SCC #3-04-001-60			POTENTIAL EMISSIONS					
POLLUTANT	*EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS		
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)
PM	0.03	0	0.24	5.76	1.05	0.24	1.05	N/A
PM10	0.03	0	0.24	5.76	1.05	0.24	1.05	N/A

Plant Totals: H.T. Aluminum Specialties, Inc.

Plantwide FESOP Limits

Pollutant	POTENTIAL EMISSIONS						ALLOWABLE	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	94.6	2271.1	414.5	2.1	9.4	0.013	-	250
PM10	94.6	2271.1	414.5	2.1	9.4	0.013	-	100
SOx	0	0	0	0	0	0	-	100
NOx	0	0	0	0	0	0	-	100
VOC	0	0	0	0	0	0	-	100
CO	0	0	0	0	0	0	-	100
HAPs	0	0	0	0	0	0	-	10/25