



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: December 2, 2008
RE: SCN, LLC / 167-25335-00120
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY AND VIGO COUNTY AIR POLLUTION CONTROL

CSN, LLC
455 West Industrial Drive
Terre Haute, Indiana 47802

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

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

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

Operation Permit No.: T 167-25335-00120	
Issued by: <i>Original Signed By:</i>	Issuance Date: December 2, 2008
Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date: December 2, 2013

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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 Vigo County Air Pollution Control (VCAPC). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary steel processing plant.

Source Address:	455 West Industrial Drive, Terre Haute, Indiana 47802
Mailing Address:	455 West Industrial Drive, Terre Haute, Indiana 47802
General Source Phone Number:	(812) 299-4157
SIC Code:	3316
County Location:	Vigo
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Steel processing plant is not 1 of 28 source categories; batch annealing system, reversing two stand cold mill, and temper mill are considered 1 of 28 listed source categories, nested within the steel processing plant

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

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

1. Galvanizing Line, identified as GAL-1, constructed in August 1999, with a maximum capacity of 140,000 pounds of steel per hour consisting of the following equipment (Note: a portion of this line may be used as a continuous annealing line instead of galvanizing only):
 - a) Galvanizing Line Strip Dryer Furnace, identified as GL-01, with a maximum capacity of 2.0 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to the building interior.
 - b) Galvanizing Line Direct Fire Zone Furnace, identified as GL-02, with a maximum capacity of 45.3 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to stack 002.
 - c) Galvanizing Line Radiant Heat Tube Furnace, identified as GL-03, with a maximum capacity of 13.2 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to stack 003.
 - d) Galvanizing Line Chromate Spray Dryer Furnace, identified as GL-04, with a maximum capacity of 2.0 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to the building interior.
 - e) Galvanizing Line Spray Cleaning section with a brush scrubber and strip rinse,

- identified as GL-05, utilizing hot alkali solution, using mist elimination for control, and exhausting to stack 006.
- f) Galvanizing Line Zinc Induction Melting section, identified as GL-06, with a maximum zinc melt capacity of 10,200 pounds per hour, using no control, and exhausting to the building interior.
 - g) Galvanizing Line Temper Mill, identified as GL-07, utilizing a detergent as the rolling fluid, using no control, and exhausting to the building interior.
 - h) Galvanizing Line Chromate Spray section, identified as GL-08, utilizing a maximum of 0.37 pounds per hour of chromic acid, using no control, and exhausting to the building interior.
2. Three (3) Package Boilers, identified as PB-1 through PB-3, constructed in July 1999, with a maximum capacity of 32.7 million BTU per hour each, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to stacks 005A, 005B, and 005C respectively.
3. Pickle Line, identified as PL-1, constructed in July 1999, with a maximum capacity of 300 tons of steel per hour, utilizing Hydrochloric Acid as the pickling liquor, consisting of the following equipment:
- a) Four (4) pickle tanks, identified as pickle tank #1 through pickle tank #4, with a maximum capacity of 5,200 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - b) One(1) five-chamber cascading re-circulating rinse tank, identified as rinse tank #1, with a maximum capacity of 3,800 gallons, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - c) Strip Dryer, identified as PL-dryer, with a maximum capacity of 5,900 scfm of air heated in the package boilers, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - d) Two (2) fresh acid storage tanks, identified as Tank #1 and Tank #2, with a maximum capacity of 24,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - e) Four (4) pickle liquor re-circulation tanks, identified as Tank #3 through Tank #6, with a maximum capacity of 12,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - f) Spent rinse water storage tank, identified as Tank #9 , with a maximum capacity of 12,000 gallons, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - g) Two (2) spent liquor storage tanks, identified as Tank #7 and #8, with a maximum capacity of 24,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.

- h) Welding / Shearing operations to conduct continuous pickling.
 - i) Pickle Line Scale Breaker, controlled by a Wheelabrator baghouse (Model 120 Series 6P), and exhausting to stack 007.
- 4. Batch Annealing system, constructed in 1999, consisting of 18 bases and 9 batch annealing furnaces. The furnaces are identified as BA-01 through BA-09, with a maximum capacity of 6.0 million BTU per hour each, primarily fired on natural gas but also consuming evaporated oil from the coils being annealed and having propane backup, using low NO_x burners for control, and exhausting to the building interior.
 - 5. Two Stand Reversing Cold Mill, identified as RCM-1, constructed in January 2000, with a maximum capacity of 400,000 pounds of steel per hour, using a progressive purification filter system with stack skimming for control, and exhausting to stack 004.
 - 6. Temper Mill, identified as TM-1, constructed in July 1999, with a maximum capacity of 158,000 pounds of steel per hour, using no control and exhausting to the building interior.
 - 7. Seven (7) space heating units, with no identification, constructed in August 1999, with a maximum capacity of 6.6 million BTU per hour each, fired on either natural gas or propane.

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

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

Fugitive emissions from paved/unpaved roads and lots [326 IAC 6-4].

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

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

-
- (a) This permit, T 167-25335-00120, 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 VCAPC, 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, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7]

-
- (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 VCAPC, 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 VCAPC.

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

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

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

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

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

-
- (a) The Permittee shall furnish to IDEM, OAQ and VCAPC, within a reasonable time, any information that IDEM, OAQ and VCAPC may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ and VCAPC copies of records required to be kept by this permit.

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

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

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

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

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

and

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

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

- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and VCAPC may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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 VCAPC upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and VCAPC. IDEM, OAQ and VCAPC may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR 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.11 Emergency Provisions [326 IAC 2-7-16]

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

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and VCAPC 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
Vigo County Air Pollution Control phone: (812) 462-3433; fax: (812) 462-3447

- (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

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ and VCAPC may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and VCAPC by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, or VCAPC shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or VCAPC has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or VCAPC has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T 167-25335-00120 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

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

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

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

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

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

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

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

- (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 VCAPC 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 2-7 until IDEM, OAQ and VCAPC 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 VCAPC any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- and
- Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 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
 - Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807
 - and
 - United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to

326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

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

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

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

(e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ and VCAPC 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 and VCAPC the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Stack Height [326 IAC 1-7]

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

All required notifications shall be submitted to:

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

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

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

C.7 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

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and VCAPC 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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

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

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

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on October 3, 2005.
- (b) Upon direct notification by IDEM, OAQ and VCAPC that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ and VCAPC, 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or VCAPC makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC 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 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

- (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 VCAPC on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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 (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and VCAPC. The general public request this information from the IDEM, OAQ and VCAPC 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:

1. Galvanizing Line, identified as GAL-1, constructed in August 1999, with a maximum capacity of 140,000 pounds of steel per hour consisting of the following equipment (Note: a portion of this line may be used as a continuous annealing line instead of galvanizing only):
 - a) Galvanizing Line Strip Dryer Furnace, identified as GL-01, with a maximum capacity of 2.0 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to the building interior.
 - b) Galvanizing Line Direct Fire Zone Furnace, identified as GL-02, with a maximum capacity of 45.3 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to stack 002.
 - c) Galvanizing Line Radiant Heat Tube Furnace, identified as GL-03, with a maximum capacity of 13.2 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to stack 003.
 - d) Galvanizing Line Chromate Spray Dryer Furnace, identified as GL-04, with a maximum capacity of 2.0 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to the building interior.
 - e) Galvanizing Line Spray Cleaning section with a brush scrubber and strip rinse, identified as GL-05, utilizing hot alkali solution, using mist elimination for control, and exhausting to stack 006.
 - f) Galvanizing Line Zinc Induction Melting section, identified as GL-06, with a maximum zinc melt capacity of 10,200 pounds per hour, using no control, and exhausting to the building interior.
 - g) Galvanizing Line Temper Mill, identified as GL-07, utilizing a detergent as the rolling fluid, using no control, and exhausting to the building interior.
 - h) Galvanizing Line Chromate Spray section, identified as GL-08, utilizing a maximum of 0.37 pounds per hour of chromic acid, using no control, and exhausting to the building interior.

(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 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2]

The PM and PM₁₀ emissions from the Galvanizing Line Spray Cleaning section identified as GL-05, shall not exceed 2.19 pounds per hour, each. Compliance with this PM and PM₁₀ limit in conjunction with the total potential to emit of PM and PM₁₀ from the rest of the source, shall ensure

that the source-wide PM and PM₁₀ emissions are less than 250 tons per twelve consecutive month period and the PM and PM₁₀ emissions of the nested portion are less than 100 tons per twelve consecutive month period, rendering the requirements of 326 IAC 2-2 (PSD) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2 (a) (formerly 326 IAC 6-1-2 (a)), each units in the Galvanizing Line shall not discharge any gases containing more than 0.03 grain per dry standard cubic foot (gr/dscf) of particulate matter.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5 (13)]

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

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

- (a) Prior to May 14, 2009, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM testing on the Galvanizing Line Spray Cleaner system outlet (GL-05) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Prior to May 14, 2009, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM₁₀ testing on the Galvanizing Line Spray Cleaner system outlet (GL-05) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.5 Particulate Matter (PM)

In order to comply with D.1.1 and D.1.2, the mist eliminator for PM and PM₁₀ control shall be in operation at all times when the Galvanizing Line Spray Cleaning system is in operation.

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

D.1.6 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the mist eliminator used in conjunction with the Galvanizing Line Spray Cleaning system at least once per day when the facilities are in operation. When for any one reading, the pressure drop across the mist eliminator is outside the normal range of 0.1 to 0.6 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 pressured shall comply with Section C- Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and Vigo County Air Pollution Control, and shall be calibrated at least once every six (6) months.

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

D.1.7 Record Keeping Requirement

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain daily records of the pressure drop across the mist eliminator. The Permittee shall include in its weekly record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

2. Three (3) Package Boilers, identified as PB-1 through PB-3, constructed in July 1999, with a maximum capacity of 32.7 million BTU per hour each, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to stacks 005A, 005B, and 005C respectively.

(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 2-7-5(1)]

D.2.1 General Provisions Relating to NSPS [326 IAC 12][40 CFR 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated under 326 IAC 12, apply to the boilers (PB-1, PB-2, PB-3) except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.2.2 Particulate Matter (PM) [326 IAC 6.5-1-2 (b) (3)]

Pursuant to 326 IAC 6.5-1-2 (b) (formerly 326 IAC 6-1-2 (b)), particulate matter (PM) emissions from the boilers (PB-1, PB-2, and PB-3) shall be limited to 0.01 grain per dry standard cubic foot.

D.2.3 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

The boilers (PB-1, PB-2, and PB-3) are not considered to be part of the nested source with regards to the applicability of 326 IAC 2-2 (Prevention of Significant Deterioration).

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5 (13)]

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

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

D.2.5 NSPS Fuel Use Record Keeping [40 CFR 60.48c, Subpart Dc]

Pursuant to 40 CFR 60.48c (g), the Permittee shall record and maintain records of the amounts of each fuel combusted during each month.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

3. Pickle Line, identified as PL-1, constructed in July 1999, with a maximum capacity of 300 tons of steel per hour, utilizing Hydrochloric Acid as the pickling liquor, consisting of the following equipment:
 - a) Four (4) pickle tanks, identified as pickle tank #1 through pickle tank #4, with a maximum capacity of 5,200 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - b) One(1) five-chamber cascading re-circulating rinse tank, identified as rinse tank #1, with a maximum capacity of 3,800 gallons, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - c) Strip Dryer, identified as PL-dryer, with a maximum capacity of 5,900 scfm of air heated in the package boilers, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - d) Two (2) fresh acid storage tanks, identified as Tank #1 and Tank #2, with a maximum capacity of 24,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - e) Four (4) pickle liquor re-circulation tanks, identified as Tank #3 through Tank #6, with a maximum capacity of 12,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - f) Spent rinse water storage tank, identified as Tank #9 , with a maximum capacity of 12,000 gallons, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - g) Two (2) spent liquor storage tanks, identified as Tank #7 and #8, with a maximum capacity of 24,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - h) Electrostatic Oiler, identified as PL-oiler, with maximum capacity of 0.65 pounds of oil per ton of steel, using no control and exhausting to the building interior.
 - i) Welding / Shearing operations to conduct continuous pickling.
 - j) Pickle Line Scale Breaker, controlled by a Wheelabrator baghouse (Model 120 Series 6P), and exhausting to stack 007.

(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 2-7-5(1)]

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

The PM and PM₁₀ emissions from the Pickle Line Scale Breaker baghouse (stack 007) shall not exceed 2.72 pounds per hour. Compliance with this PM and PM₁₀ limit in conjunction with the total potential to emit of PM and PM₁₀ from the rest of the source, shall ensure that the source-wide PM and PM₁₀ emissions are less than 250 tons per twelve consecutive month period and the PM and PM₁₀ emissions from the nested portion are less than 100 tons per twelve consecutive month period, rendering the requirements of 326 IAC 2-2 (PSD) not applicable.

D.3.2 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2 (a) (formerly 326 IAC 6-1-2 (a)), the Pickle Line Scale Breaker shall not discharge any gases containing more than 0.03 grain per dry standard cubic foot (gr/dscf) of particulate matter.

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

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

Compliance Determination Requirements

D.3.4 Particulate Matter (PM)

In order to comply with D.3.1 and D.3.2, the Wheelabrator baghouse controlling PM and PM₁₀ emissions from the Pickle Line Scale Breaker shall be in operation at all times when the Pickle Line Scale Breaker is in operation.

D.3.5 Testing Requirements [326 IAC 2-1.1-11]

- (a) With in 180 days of issuance of this permit, in order to demonstrate compliance with Conditions D.3.1 and D.3.2, the Permittee shall perform PM testing on the Pickle Line Scale Breaker utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) With in 180 days of issuance of this permit, in order to demonstrate compliance with Conditions D.3.1 and D.3.2, the Permittee shall perform PM₁₀ testing on the Pickle Line Scale Breaker utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.3.6 Visible Emissions Notations

- (a) Visible emission notations of the Wheelabrator baghouse stack exhaust (stack 007), the 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.3.7 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the Pickle Line Scale Breaker at least once per day when the facilities are in operation. When for any one reading, the pressure drop across any of the baghouses is outside the normal range of and 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 Vigo County Air Pollution Control, and shall be calibrated at least once every six (6) months.

D.3.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. 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. 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 baghouses' 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 2-7-5(3)] [326 IAC 2-7-19]

D.3.9 Record Keeping Requirement

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain a daily record of visible emission notations of the facilities' stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain daily records of the pressure drop across the baghouses controlling the Pickle Line Scale Breaker. The

Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

4. Batch Annealing system, constructed in 1999, consisting of 18 bases and 9 batch annealing furnaces. The furnaces are identified as BA-01 through BA-09, with a maximum capacity of 6.0 million BTU per hour each, primarily fired on natural gas but also consuming evaporated oil from the coils being annealed and having propane backup, using low NO_x burners for control, and exhausting to the building interior.
5. Two Stand Reversing Cold Mill, identified as RCM-1, constructed in January 2000, with a maximum capacity of 400,000 pounds of steel per hour, using a progressive purification filter system with stack skimming for control, and exhausting to stack 004.
6. Temper Mill, identified as TM-1, constructed in July 1999, with a maximum capacity of 158,000 pounds of steel per hour, using no control and exhausting to the building interior.
7. Seven (7) space heating units, with no identification, constructed in August 1999, with a maximum capacity of 6.6 million BTU per hour each, fired on either natural gas or propane.

(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 2-7-5(1)]

D.4.1 PSD Minor Limit [326 IAC 2-2]

The PM and PM₁₀ emissions from the Two Stand Reversing Cold Mill (RCM-1) shall not exceed 21.7 pounds per hour. Compliance with this PM and PM₁₀ limit in conjunction with the total potential to emit of PM and PM₁₀ from the rest of the source, shall ensure that the source-wide PM and PM₁₀ emissions are less than 250 tons per twelve consecutive month period and the PM and PM₁₀ emissions of the nested portion are less than 100 tons per twelve consecutive month period, rendering the requirements of 326 IAC 2-2 (PSD) not applicable.

D.4.2 Particulate Matter Limitation [326 IAC 6.5-1-2 (a)]

Pursuant to 326 IAC 6.5-1-2 (a) (formerly 326 IAC 6-1-2 (a)), the Batch Annealing System (BA01-BA09), Temper Mill (TM-1) shall not discharge any gases containing more than 0.03 grain per dry standard cubic foot (gr/dscf) of particulate matter.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5 (13)]

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

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2 1.1 11]

- (a) Prior to May 11, 2009, in order to demonstrate compliance with Condition D.4.1 the Permittee shall perform PM testing on the progressive purification filter system outlet utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Prior to May 11, 2009, in order to demonstrate compliance with Condition D.4.1 the

Permittee shall perform PM₁₀ testing on the progressive purification filter system outlet utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.4.5 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the progressive purification filter system used in conjunction with the Two Stand Reversing Cold Mill at least once per day when the facilities are in operation. When for any one reading, the pressure drop across the mist eliminator is outside the normal range of 0.5 to 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - 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 pressured shall comply with Section C- Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and Vigo County Air Pollution Control, and shall be calibrated at least once every six (6) months.

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

D.4.6 Record Keeping Requirement

- (a) To document compliance with Condition D.4.5, the Permittee shall maintain daily records of the pressure drop across the Progressive Purification filter system. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

3. Pickle Line, identified as PL-1, constructed in July 1999, with a maximum capacity of 400 tons of steel per hour, utilizing Hydrochloric Acid as the pickling liquor, consisting of the following equipment:
 - a) Four (4) pickle tanks, identified as pickle tank #1 through pickle tank #4, with a maximum capacity of 5,200 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - b) One(1) five-chamber cascading re-circulating rinse tank, identified as rinse tank #1, with a maximum capacity of 3,800 gallons, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - c) Strip Dryer, identified as PL-dryer, with a maximum capacity of 5,900 scfm of air heated in the package boilers, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - d) Two (2) fresh acid storage tanks, identified as Tank #1 and Tank #2, with a maximum capacity of 24,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - e) Four (4) pickle liquor re-circulation tanks, identified as Tank #3 through Tank #6, with a maximum capacity of 12,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - f) Spent rinse water storage tank, identified as Tank #9 , with a maximum capacity of 12,000 gallons, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - g) Two (2) spent liquor storage tanks, identified as Tank #7 and #8, with a maximum capacity of 24,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - h) Electrostatic Oiler, identified as PL-oiler, with maximum capacity of 0.65 pounds of oil per ton of steel, using no control and exhausting to the building interior.
 - i) Welding / Shearing operations to conduct continuous pickling.
 - j) Pickle Line Scale Breaker, controlled by a Wheelabrator baghouse (Model 120 Series 6P), and exhausting to stack 007.

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

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [40 CFR Part 63, Subpart CCC]

- (a) The Permittee shall comply with the provisions of 40 CFR Part 63, Subpart CCC - General Provisions for the affected facilities as specified in Table 1 of 40 CFR 63, Subpart CCC in accordance with the schedule in 40 CFR 63 Subpart CCC.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

and

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

E.1.2 Steel Pickling Requirements [40 CFR Part 63, Subpart CCC]

Pursuant to CFR Part 63, Subpart CCC, the Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart CCC (including as Attachment A), for the Pickle Line operations:

- 40 CFR 63.1155 (a)(1), (b), (c)
- 40 CFR 63.1156
- 40 CFR 63.1158 (a)
- 40 CFR 63.1159 (b)
- 40 CFR 63.1160 (a), (b)(1)(2)
- 40 CFR 63.1161 (a) and (b)
- 40 CFR 63.1162 (a) and (c)
- 40 CFR 63.1163 (a)(4), (b), (c), (d), (e)
- 40 CFR 63.1164
- 40 CFR 63.1165

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and VCAPC
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: CSN, LLC
Source Address: 455 West Industrial Drive, Terre Haute, Indiana 47802
Mailing Address: 455 West Industrial Drive, Terre Haute, Indiana 47802
Part 70 Permit No.: T 167-25335-00120

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

and VCAPC

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: CSN, LLC
Source Address: 455 West Industrial Drive, Terre Haute, Indiana 47802
Mailing Address: 455 West Industrial Drive, Terre Haute, Indiana 47802
Part 70 Permit No.: T 167-25335-00120

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), 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
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 VCAPC**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: CSN, LLC
Source Address: 455 West Industrial Drive, Terre Haute, Indiana 47802
Mailing Address: 455 West Industrial Drive, Terre Haute, Indiana 47802
Part 70 Permit No.: T 167-25335-00120

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

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and VCAPC
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: CSN, LLC
 Source Address: 455 West Industrial Drive, Terre Haute, Indiana 47802
 Mailing Address: 455 West Industrial Drive, Terre Haute, Indiana 47802
 Part 70 Permit No.: T 167-25335-00120

Months: _____ to _____ Year: _____

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

Attachment A, NESHAP Subpart CCC

**CSN, LLC
455 West Industrial Drive
Terre Haute, Indiana 47802**

Permit No.: T 167-25335-00120

§ 63.1155 Applicability.

(a) The provisions of this subpart apply to the following facilities and plants that are major sources for hazardous air pollutants (HAP) or are parts of facilities that are major sources for HAP:

(1) All new and existing steel pickling facilities that pickle carbon steel using hydrochloric acid solution that contains 6 percent or more by weight HCl and is at a temperature of 100 °F or higher; and

(2) All new and existing hydrochloric acid regeneration plants.

(3) The provisions of this subpart do not apply to facilities that pickle carbon steel without using hydrochloric acid, to facilities that pickle only specialty steel, or to acid regeneration plants that regenerate only acids other than hydrochloric acid.

(b) For the purposes of implementing this subpart, the affected sources at a facility or plant subject to this subpart are as follows: Continuous and batch pickling lines, hydrochloric acid regeneration plants, and hydrochloric acid storage vessels.

(c) Table 1 to this subpart specifies the provisions of this part 63, subpart A that apply and those that do not apply to owners and operators of steel pickling facilities and hydrochloric acid regeneration plants subject to this subpart.

§ 63.1156 Definitions.

Terms used in this subpart are defined in the Clean Air Act, in subpart A of this part, or in this section as follows:

Batch pickling line means the collection of equipment and tanks configured for pickling metal in any form but usually in discrete shapes where the material is lowered in batches into a bath of acid solution, allowed to remain until the scale is dissolved, then removed from the solution, drained, and rinsed by spraying or immersion in one or more rinse tanks to remove residual acid.

Carbon steel means steel that contains approximately 2 percent or less carbon, 1.65 percent or less manganese, 0.6 percent or less silicon, and 0.6 percent or less copper.

Closed-vent system means a system that is not open to the atmosphere and that is composed of piping, ductwork, connections, and, if necessary, flow-inducing devices that transport emissions from a process unit or piece of equipment (e.g., pumps, pressure relief devices, sampling connections, open-ended valves or lines, connectors, and instrumentation systems) back into a closed system or into any device that is capable of reducing or collecting emissions.

Continuous pickling line means the collection of equipment and tanks configured for pickling metal strip, rod, wire, tube, or pipe that is passed through an acid solution in a continuous or nearly continuous manner and rinsed in another tank or series of tanks to remove residual acid. This definition includes continuous spray towers.

Hydrochloric acid regeneration plant means the collection of equipment and processes configured to reconstitute fresh hydrochloric acid pickling solution from spent pickle liquor using a thermal treatment process.

Hydrochloric acid regeneration plant production mode means operation under conditions that result in production of usable regenerated acid or iron oxide.

Hydrochloric acid storage vessel means a stationary vessel used for the bulk containment of virgin or regenerated hydrochloric acid.

Responsible maintenance official means a person designated by the owner or operator as having the knowledge and the authority to sign records and reports required under this rule.

Specialty steel means a category of steel that includes silicon electrical, alloy, tool, and stainless steels.

Spray tower means an enclosed vertical tower in which acid pickling solution is sprayed onto moving steel strip in multiple vertical passes.

Steel pickling means the chemical removal of iron oxide mill scale that is formed on steel surfaces during hot rolling or hot forming of semi-finished steel products through contact with an aqueous solution of acid where such contact occurs prior to shaping or coating of the finished steel product. This definition does not include removal of light rust or scale from finished steel products or activation of the metal surface prior to plating or coating.

Steel pickling facility means any facility that operates one or more batch or continuous steel pickling lines.

§ 63.1157 Emission standards for existing sources.

(a) *Pickling lines*. No owner or operator of an existing affected continuous or batch pickling line at a steel pickling facility shall cause or allow to be discharged into the atmosphere from the affected pickling line:

- (1) Any gases that contain HCl in a concentration in excess of 18 parts per million by volume (ppmv); or
- (2) HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.

(b) *Hydrochloric acid regeneration plants*. (1) No owner or operator of an existing affected plant shall cause or allow to be discharged into the atmosphere from the affected plant any gases that contain HCl in a concentration greater than 25 ppmv.

(2) In addition to the requirement of paragraph (b)(1) of this section, no owner or operator of an existing affected plant shall cause or allow to be discharged into the atmosphere from the affected plant any gases that contain chlorine (Cl₂) in a concentration in excess of either 6 ppmv or an alternative source-specific maximum concentration. The source-specific maximum concentration standard shall be established according to §63.1161(c)(2) of this subpart.

§ 63.1158 Emission standards for new or reconstructed sources.

(a) *Pickling lines* —(1) *Continuous pickling lines*. No owner or operator of a new or reconstructed affected continuous pickling line at a steel pickling facility shall cause or allow to be discharged into the atmosphere from the affected pickling line:

- (i) Any gases that contain HCl in a concentration in excess of 6 ppmv; or
- (ii) HCl at a mass emission rate that corresponds to a collection efficiency of less than 99 percent.

(2) *Batch pickling lines*. No owner or operator of a new or reconstructed affected batch pickling line at a steel pickling facility shall cause or allow to be discharged into the atmosphere from the affected pickling line:

- (i) Any gases that contain HCl in a concentration in excess of 18 ppmv; or
- (ii) HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.

(b) Hydrochloric acid regeneration plants. (1) No owner or operator of a new or reconstructed affected plant shall cause or allow to be discharged into the atmosphere from the affected plant any gases that contain HCl in a concentration greater than 12 ppmv.

(2) In addition to the requirement of paragraph (b)(1) of this section, no owner or operator of a new or reconstructed affected plant shall cause or allow to be discharged into the atmosphere from the affected plant any gases that contain Cl₂ in a concentration in excess of 6 ppmv.

§ 63.1159 Operational and equipment standards for existing, new, or reconstructed sources.

(a) Hydrochloric acid regeneration plant. The owner or operator of an affected plant must operate the affected plant at all times while in production mode in a manner that minimizes the proportion of excess air fed to the process and maximizes the process offgas temperature consistent with producing usable regenerated acid or iron oxide.

(b) Hydrochloric acid storage vessels. The owner or operator of an affected vessel shall provide and operate, except during loading and unloading of acid, a closed-vent system for each vessel. Loading and unloading shall be conducted either through enclosed lines or each point where the acid is exposed to the atmosphere shall be equipped with a local fume capture system, ventilated through an air pollution control device.

§ 63.1160 Compliance dates and maintenance requirements.

(a) Compliance dates. (1) The owner or operator of an affected existing steel pickling facility and/or hydrochloric acid regeneration plant subject to this subpart shall achieve initial compliance with the requirements of this subpart no later than June 22, 2001.

(2) The owner or operator of a new or reconstructed steel pickling facility and/or hydrochloric acid regeneration plant subject to this subpart that commences construction or reconstruction after September 18, 1997, shall achieve compliance with the requirements of this subpart immediately upon startup of operations or by June 22, 1999, whichever is later.

(b) Maintenance requirements. (1) The owner or operator of an affected source shall comply with the operation and maintenance requirements prescribed under §63.6(e) of subpart A of this part.

(2) In addition to the requirements specified in paragraph (b)(1) of this section, the owner or operator shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the source's title V permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

- (i) Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;

(ii) Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;

(iii) Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling;

(iv) Require an inspection of each scrubber at intervals of no less than 3 months with:

(A) Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;

(B) Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;

(C) Repair or replacement of droplet eliminator elements as needed;

(D) Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and

(E) Adjustment of damper settings for consistency with the required air flow.

(v) If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Administrator may be used.

(vi) The owner or operator shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of this subpart.

(vii) The owner or operator shall maintain a record of each inspection, including each item identified in paragraph (b)(2)(iv) of this section, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

(3) The owner or operator of each hydrochloric acid regeneration plant shall develop and implement a written maintenance program. The program shall require:

(i) Performance of the manufacturer's recommended maintenance at the recommended intervals on all required systems and components;

(ii) Initiation of procedures for appropriate and timely repair, replacement, or other corrective action within 1 working day of detection; and

(iii) Maintenance of a daily record, signed by a responsible maintenance official, showing the date of each inspection for each requirement, the problems found, a description of the repair, replacement, or other action taken, and the date of repair or replacement.

§ 63.1161 Performance testing and test methods.

(a) Demonstration of compliance. The owner or operator shall conduct an initial performance test for each process or emission control device to determine and demonstrate compliance with the applicable emission limitation according to the requirements in §63.7 of subpart A of this part and in this section.

(1) Following approval of the site-specific test plan, the owner or operator shall conduct a performance test for each process or control device to either measure simultaneously the mass flows of HCl at the inlet and the outlet of the control device (to determine compliance with the applicable collection efficiency standard) or measure the concentration of HCl (and Cl₂ for hydrochloric acid regeneration plants) in gases exiting the process or the emission control device (to determine compliance with the applicable emission concentration standard).

(2) Compliance with the applicable concentration standard or collection efficiency standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.

(3) Compliance is achieved if either the average collection efficiency as determined by the HCl mass flows at the control device inlet and outlet is greater than or equal to the applicable collection efficiency standard, or the average measured concentration of HCl or Cl₂ exiting the process or the emission control device is less than or equal to the applicable emission concentration standard.

(b) Establishment of scrubber operating parameters. During the performance test for each emission control device, the owner or operator using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation, the minimum recirculation water flow rate. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The owner or operator shall determine the operating parameter monitoring values as the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per paragraph (a)(2) of this section. An owner or operator may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, an owner or operator may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

(c) Establishment of hydrochloric acid regeneration plant operating parameters. (1) During the performance test for hydrochloric acid regeneration plants, the owner or operator shall establish site-specific operating parameter values for the minimum process offgas temperature and the maximum proportion of excess air fed to the process as described in §63.1162(b)(1) of this subpart. During the emission test, each operating parameter must be monitored and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes for parameters that are monitored continuously. Amount of iron in the spent pickle liquor shall be determined for each run by sampling the liquor every 15 minutes and analyzing a composite of the samples. The owner or operator shall determine the compliant monitoring values as the averages of the values recorded during any of the runs for which results are used to establish the emission concentration per paragraph (a)(2) of this section. An owner or operator may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, an owner or operator may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

(2) During this performance test, the owner or operator of an existing affected plant may establish an alternative concentration standard if the owner or operator can demonstrate to the Administrator's satisfaction that the plant cannot meet a concentration limitation for Cl₂ of 6 ppmv when operated within its design parameters. The alternative concentration standard shall be established through performance testing while the plant is operated at maximum design temperature and with the minimum proportion of excess air that allows production of iron oxide of acceptable quality while measuring the Cl₂ concentration in the process exhaust gas. The measured concentration shall be the concentration standard for that plant.

(d) Test methods. (1) The following test methods in appendix A of 40 CFR part 60 shall be used to determine compliance under §63.1157(a), §63.1157(b), §63.1158(a), and §63.1158(b) of this subpart:

(i) Method 1, to determine the number and location of sampling points, with the exception that no traverse point shall be within one inch of the stack or duct wall;

(ii) Method 2, to determine gas velocity and volumetric flow rate;

(iii) Method 3, to determine the molecular weight of the stack gas;

(iv) Method 4, to determine the moisture content of the stack gas; and

(v) Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources—Isokinetic Method," to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere, and also to determine the concentration of Cl₂ discharged to the atmosphere from acid regeneration plants. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (30 dry standard cubic feet). The concentrations of HCl and Cl₂ shall be calculated for each run as follows:

$$CHCl(\text{ppmv}) = 0.659 CHCl(\text{mg/dscm}),$$

$$\text{and } CC_{12}(\text{ppmv}) = 0.339 CC_{12}(\text{mg/dscm}),$$

where C(ppmv) is concentration in ppmv and C(mg/dscm) is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.

(2) The owner or operator may use equivalent alternative measurement methods approved by the Administrator.

§ 63.1162 Monitoring requirements.

(a) The owner or operator of a new, reconstructed, or existing steel pickling facility or acid regeneration plant subject to this subpart shall:

(1) Conduct performance tests to measure the HCl mass flows at the control device inlet and outlet or the concentration of HCl exiting the control device according to the procedures described in §63.1161 of this subpart. Performance tests shall be conducted either annually or according to an alternative schedule that is approved by the applicable permitting authority, but no less frequently than every 2 1/2 years or twice per title V permit term. If any performance test shows that the HCl emission limitation is being exceeded, then the owner or operator is in violation of the emission limit.

(2) In addition to conducting performance tests, if a wet scrubber is used as the emission control device, install, operate, and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if required, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in §63.1160(b)(2) of this subpart.

(3) If an emission control device other than a wet scrubber is used, install, operate, and maintain systems for the measurement and recording of the appropriate operating parameters.

(4) Failure to record each of the operating parameters listed in paragraph (a)(2) of this section is a violation of the monitoring requirements of this subpart.

(5) Each monitoring device shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.

(6) The owner or operator may develop and implement alternative monitoring requirements subject to approval by the Administrator.

(b) The owner or operator of a new, reconstructed, or existing acid regeneration plant subject to this subpart shall also install, operate, and maintain systems for the measurement and recording of the:

(1) Process offgas temperature, which shall be monitored continuously and recorded at least once every shift while the facility is operating in production mode; and

(2) Parameters from which proportion of excess air is determined. Proportion of excess air shall be determined by a combination of total air flow rate, fuel flow rate, spent pickle liquor addition rate, and amount of iron in the spent pickle liquor, or by any other combination of parameters approved by the Administrator in accordance with §63.8(f) of subpart A of this part. Proportion of excess air shall be determined and recorded at least once every shift while the plant is operating in production mode.

(3) Each monitoring device must be certified by the manufacturer to be accurate to within 5 percent and must be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.

(4) Operation of the plant with the process offgas temperature lower than the value established during performance testing or with the proportion of excess air greater than the value established during performance testing is a violation of the operational standard specified in §63.1159(a) of this subpart.

(c) The owner or operator of an affected hydrochloric acid storage vessel shall inspect each vessel semiannually to determine that the closed-vent system and either the air pollution control device or the enclosed loading and unloading line, whichever is applicable, are installed and operating when required.

§ 63.1163 Notification requirements.

(a) Initial notifications. As required by §63.9(b) of subpart A of this part, the owner or operator shall submit the following written notifications to the Administrator:

(1) The owner or operator of an area source that subsequently becomes subject to the requirements of the standard shall provide notification to the applicable permitting authority as required by §63.9(b)(1) of subpart A of this part.

(2) As required by §63.9(b)(2) of subpart A of this part, the owner or operator of an affected source that has an initial startup before June 22, 1999, shall notify the Administrator that the source is subject to the requirements of the standard. The notification shall be submitted not later than October 20, 1999 (or within 120 calendar days after the source becomes subject to this standard), and shall contain the information specified in §§63.9(b)(2)(i) through 63.9(b)(2)(v) of subpart A of this part.

(3) As required by §63.9(b)(3) of subpart A of this part, the owner or operator of a new or reconstructed affected source, or a source that has been reconstructed such that it is an affected source, that has an initial startup after the effective date and for which an application for approval of construction or reconstruction is not required under §63.5(d) of subpart A of this part, shall notify the Administrator in writing that the source is subject to the standards no later than 120 days after initial startup. The notification shall contain the information specified in §§63.9(b)(2)(i) through 63.9(b)(2)(v) of subpart A of this part, delivered or postmarked with the notification required in §63.9(b)(5) of subpart A of this part.

(4) As required by §63.9(b)(4) of subpart A of this part, the owner or operator of a new or reconstructed major affected source that has an initial startup after June 22, 1999, and for which an application for approval of construction or reconstruction is required under §63.5(d) of subpart A of this part shall provide the information specified in §§63.9(b)(4)(i) through 63.9(b)(4)(v) of subpart A of this part.

(5) As required by §63.9(b)(5) of subpart A of this part, the owner or operator who, after June 22, 1999, intends to construct a new affected source or reconstruct an affected source subject to this standard, or reconstruct a source such that it becomes an affected source subject to this standard, shall notify the Administrator, in writing, of the intended construction or reconstruction.

(b) Request for extension of compliance. As required by §63.9(c) of subpart A of this part, if the owner or operator of an affected source cannot comply with this standard by the applicable compliance date for that source, or if the owner or operator has installed BACT or technology to meet LAER consistent with §63.6(i)(5) of subpart A of this part, he/she may submit to the Administrator (or the State with an approved permit program) a request for an extension of compliance as specified in §§63.6(i)(4) through 63.6(i)(6) of subpart A of this part.

(c) Notification that source is subject to special compliance requirements. As required by §63.9(d) of subpart A of this part, an owner or operator of a new source that is subject to special compliance requirements as specified in §§63.6(b)(3) and 63.6(b)(4) of subpart A of this part shall notify the Administrator of his/her compliance obligations not later than the notification dates established in §63.9(b) of subpart A of this part for new sources that are not subject to the special provisions.

(d) Notification of performance test. As required by §63.9(e) of subpart A of this part, the owner or operator of an affected source shall notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow the Administrator to review and approve the site-specific test plan required under §63.7(c) of subpart A of this part and, if requested by the Administrator, to have an observer present during the test.

(e) Notification of compliance status. The owner or operator of an affected source shall submit a notification of compliance status as required by §63.9(h) of subpart A of this part when the source becomes subject to this standard.

§ 63.1164 Reporting requirements.

(a) *Reporting results of performance tests.* As required by §63.10(d)(2) of subpart A of this part, the owner or operator of an affected source shall report the results of any performance test as part of the notification of compliance status required in §63.1163 of this subpart.

(b) *Progress reports.* The owner or operator of an affected source who is required to submit progress reports under §63.6(i) of subpart A of this part shall submit such reports to the Administrator (or the State with an approved permit program) by the dates specified in the written extension of compliance.

(c) *Periodic startup, shutdown, and malfunction reports.* Section 63.6(e) of subpart A of this part requires the owner or operator of an affected source to operate and maintain each affected emission source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all times, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practicable after their occurrence.

(1) *Plan.* As required by §63.6(e)(3) of subpart A of this part, the owner or operator shall develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standards.

(2) *Reports.* As required by §63.10(d)(5)(i) of subpart A of this part, if actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the owner or operator shall state such information in a semiannual report. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half; and

(3) *Immediate Reports.* Any time an action taken by an owner or operator during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the owner or operator shall comply with all requirements of §63.10(d)(5)(ii) of subpart A of this part.

§ 63.1165 Recordkeeping requirements.

(a) *General recordkeeping requirements.* As required by §63.10(b)(2) of subpart A of this part, the owner or operator shall maintain records for 5 years from the date of each record of:

- (1) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
- (2) The occurrence and duration of each malfunction of the air pollution control equipment;
- (3) All maintenance performed on the air pollution control equipment;
- (4) Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
- (5) All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see §63.10(b)(2)(v) of subpart A of this part);
- (6) All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;
- (7) All results of initial or subsequent performance tests;
- (8) If the owner or operator has been granted a waiver from recordkeeping or reporting requirements under §63.10(f) of subpart A of this part, any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements;
- (9) If the owner or operator has been granted a waiver from the initial performance test under §63.7(h) of subpart A of this part, a copy of the full request and the Administrator's approval or disapproval;
- (10) All documentation supporting initial notifications and notifications of compliance status required by §63.9 of subpart A of this part; and
- (11) Records of any applicability determination, including supporting analyses.

(b) *Subpart CCC records.* (1) In addition to the general records required by paragraph (a) of this section, the owner or operator shall maintain records for 5 years from the date of each record of:

- (i) Scrubber makeup water flow rate and recirculation water flow rate if a wet scrubber is used;
- (ii) Calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and

(iii) Each maintenance inspection and repair, replacement, or other corrective action.

(2) The owner or operator of an acid regeneration plant shall also maintain records for 5 years from the date of each record of process offgas temperature and parameters that determine proportion of excess air.

(3) The owner or operator shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Administrator for a period of 5 years after each revision to the plan.

(c) *Recent records.* General records and subpart CCC records for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

§ 63.1166 Implementation and enforcement.

(a) This subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to a State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

(c) The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs (c)(1) through (8) of this section.

(1) Approval of alternatives to the requirements in §§63.1155, 63.1157 through 63.1159, and 63.1160(a).

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f), as defined in §63.90, and as required in this subpart.

(3) Approval of any alternative measurement methods for HCl and CL₂ to those specified in §63.1161(d)(1).

(4) Approval of major alternatives to monitoring under §63.8(f), as defined in §63.90, and as required in this subpart.

(5) Approval of any alternative monitoring requirements to those specified in §§63.1162(a)(2) through (5) and 63.1162(b)(1) through (3).

(6) Approval of major alternatives to recordkeeping and reporting under §63.10(f), as defined in §63.90, and as required in this subpart.

(7) Waiver of recordkeeping requirements specified in §63.1165.

(8) Approval of an alternative schedule for conducting performance tests to the requirement specified in §63.1162(a)(1).

[68 FR 37356, June 23, 2003]

§§ 63.1167-63.1174 [Reserved]

Table 1 to Subpart CCC of Part 63—Applicability of General Provisions (40 CFR Part 63, Subpart A) to Subpart CCC

Reference	Applies to Subpart CCC	Explanation
63.1–63.5	Yes.	
63.6 (a)–(g)	Yes.	
63.6 (h)	No	Subpart CCC does not contain an opacity or visible emission standard.
63.6 (i)–(j)	Yes.	
63.7–63.9	Yes.	
63.10 (a)–(c)	Yes.	
63.10 (d) (1)–(2)	Yes.	
63.10 (d)(3)	No	Subpart CCC does not contain an opacity or visible emission standard.
63.10 (d) (4)–(5)	Yes.	
63.10 (e)–(f)	Yes.	
63.11	No	Subpart CCC does not require the use of flares.
63.12–63.15	Yes	

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

**Addendum to the
Technical Support Document (TSD) for a Part 70 Operating Permit Renewal**

Source Name:	CSN, LLC
Source Location:	455 West Industrial Drive, Terre Haute, Indiana 47802
County:	Vigo
SIC Code:	3316
Permit Renewal No.:	T 167-25335-00120
Permit Reviewer:	Timothy R. Pettifor

On October 9, 2008, the Office of Air Quality (OAQ) had a notice published in the Tribune Star, Terre Haute, Indiana, stating that CSN, LLC had applied for a Part 70 Operating Permit renewal to continue to operate a stationary steel processing plant. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit renewal for this operation and provided information on how the public could review the proposed Part 70 Operating Permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit renewal should be issued as proposed. No comments were received.

Pursuant to Administrative Amendment 167-14778-00120, issued on September 13, 2001, this source's name is CSN, LLC. Therefore, all references to the company's name have been changed from Companhia Siderurgica Nacional, LLC (CSN, LLC) to CSN, LLC. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Indiana Department of Environmental Management
Office of Air Quality
and
Vigo County Air Pollution Control

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Companhia Siderugica Nacional, LLC (CSN, LLC)
Source Location:	455 West Industrial Drive, Terre Haute, Indiana 47802
County:	Vigo
SIC Code:	3316
Permit Renewal No.:	T 167-25335-00120
Permit Reviewer:	Timothy R. Pettifor

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from CSN, LLC relating to the operation of a stationary steel processing plant.

History

On September 25, 2007, CSN, LLC (formerly Heartland Steel) submitted applications to the OAQ requesting to renew its operating permit. CSN, LLC was issued a Part 70 Operating Permit T 167-12516-00120 on June 24, 2003.

Permitted Emission Units and Pollution Control Equipment

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

1. Galvanizing Line, identified as GAL-1, constructed in August 1999, with a maximum capacity of 140,000 pounds of steel per hour consisting of the following equipment (Note: a portion of this line may be used as a continuous annealing line instead of galvanizing only):
 - a) Galvanizing Line Strip Dryer Furnace, identified as GL-01, with a maximum capacity of 2.0 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to the building interior.
 - b) Galvanizing Line Direct Fire Zone Furnace, identified as GL-02, with a maximum capacity of 45.3 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to stack 002.
 - c) Galvanizing Line Radiant Heat Tube Furnace, identified as GL-03, with a maximum capacity of 13.2 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to stack 003.
 - d) Galvanizing Line Chromate Spray Dryer Furnace, identified as GL-04, with a maximum capacity of 2.0 million BTU per hour, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to the building interior.
 - e) Galvanizing Line Spray Cleaning section with a brush scrubber and strip rinse, identified as GL-05, utilizing hot alkali solution, using mist elimination for control, and exhausting to stack 006.
 - f) Galvanizing Line Zinc Induction Melting section, identified as GL-06, with a maximum zinc melt capacity of 10,200 pounds per hour, using no control, and exhausting to the building interior.

- g) Galvanizing Line Temper Mill, identified as GL-07, utilizing a detergent as the rolling fluid, using no control, and exhausting to the building interior.
 - h) Galvanizing Line Chromate Spray section, identified as GL-08, utilizing a maximum of 0.37 pounds per hour of chromic acid, using no control, and exhausting to the building interior.
2. Three (3) Package Boilers, identified as PB-1 through PB-3, constructed in July 1999, with a maximum capacity of 32.7 million BTU per hour each, primarily fired on natural gas but with propane backup, using low NO_x burners for control, and exhausting to stacks 005A, 005B, and 005C respectively.
3. Pickle Line, identified as PL-1, constructed in July 1999, with a maximum capacity of 300 tons of steel per hour, utilizing Hydrochloric Acid as the pickling liquor, consisting of the following equipment:
- a) Four (4) pickle tanks, identified as pickle tank #1 through pickle tank #4, with a maximum capacity of 5,200 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - b) One(1) five-chamber cascading re-circulating rinse tank, identified as rinse tank #1, with a maximum capacity of 3,800 gallons, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - c) Strip Dryer, identified as PL-dryer, with a maximum capacity of 5,900 scfm of air heated in the package boilers, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - d) Two (2) fresh acid storage tanks, identified as Tank #1 and Tank #2, with a maximum capacity of 24,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - e) Four (4) pickle liquor re-circulation tanks, identified as Tank #3 through Tank #6, with a maximum capacity of 12,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - f) Spent rinse water storage tank, identified as Tank #9 , with a maximum capacity of 12,000 gallons, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - g) Two (2) spent liquor storage tanks, identified as Tank #7 and #8, with a maximum capacity of 24,000 gallons each, using a packed tower wet scrubber for control (including a chevron blade entrainment separator), and exhausting to stack 001.
 - h) Welding / Shearing operations to conduct continuous pickling.
 - i) Pickle Line Scale Breaker, controlled by a Wheelabrator baghouse (Model 120 Series 6P), and exhausting to stack 007.
4. Batch Annealing system, constructed in 1999, consisting of 18 bases and 9 batch annealing furnaces. The furnaces are identified as BA-01 through BA-09, with a maximum capacity of 6.0 million BTU per hour each, primarily fired on natural gas but also consuming evaporated oil from the coils being annealed and having propane backup, using low NO_x burners for control, and exhausting to the building interior.

5. Two Stand Reversing Cold Mill, identified as RCM-1, constructed in January 2000, with a maximum capacity of 400,000 pounds of steel per hour, using a progressive purification filter system with stack skimming for control, and exhausting to stack 004.
6. Temper Mill, identified as TM-1, constructed in July 1999, with a maximum capacity of 158,000 pounds of steel per hour, using no control and exhausting to the building interior.
7. Seven (7) space heating units, with no identification, constructed in August 1999, with a maximum capacity of 6.6 million BTU per hour each, fired on either natural gas or propane.

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

There are no unpermitted facilities operating at this source during this review.

Insignificant Activities

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

1. Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour; or propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) BTU per hour.
2. Fugitive emissions from paved/unpaved roads and lots [326 IAC 6-4].
3. Equipment powered by internal combustion engines of capacity equal to or less than 500,000 BTU/hr, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 BTU/hr.
4. 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.
5. 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.
6. The following VOC and HAP storage containers:
 - a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
7. Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
8. Machining where an aqueous cutting coolant continuously floods the machining interface.
9. The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
10. Rolling oil recovery systems.
11. Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
12. Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAP

13. Noncontact cooling tower systems with the following: Natural draft cooling towers not regulated under a NESHAP.
14. Quenching operations used with heat treating processes.
15. Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
16. Heat exchanger cleaning and repair.
17. Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
18. Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
19. Emergency generators as follows: Diesel generators not exceeding 1600 horsepower, including the following: two (2) emergency generators each rated at 1447 BHP (69.7 gallons per hour).
20. A laboratory as defined in 326 IAC 2-7-1(21)(D).
21. Other activities or categories (potential emissions of: less than 25 pounds per day of CO or NO_x; less than 5 pounds per hour or 25 pounds per day of SO₂ or PM₁₀; less than 3 pounds per hour or 15 pounds per day of VOC; less than 3.29 pounds per day or 0.6 tons per year for lead or lead compounds):
 - a) Trimming operations
 - b) Waste water treatment
 - c) Electrostatic oiler on galvanizing line with a maximum capacity of 250 mg/M².
 - c) Electrostatic oiler on pickle line with a maximum capacity of 350 mg/M².
 - d) Electrostatic oiler shear on slitter line with a maximum capacity of 250 mg/M².
 - e) Electrostatic oiler on temper mill with a maximum capacity of 500 mg/M².

Existing Approvals

Since the issuance of the Part 70 Operating Permit T 167-12516-00120 on June 24, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 167-20150-00120 issued on December 21, 2004;
- (b) Significant Permit Modification No. 167-19139-00120 issued on March 18, 2005;
- (c) Significant Permit Modification No. 167-18865-00120 issued on June 22, 2005;
- (d) Significant Permit Modification No. 167-23853-00120 issued on April 10, 2007.

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.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 Operating Permit Renewal Renewal:

- (a) The routine inspections for the mist eliminator from the galvanizing line spray cleaning section (GL-05), baghouse for the Pickle Line Scale Breaker (PL-07), and the progressive purification system for the Two Stand Reversing Cold Mill (RCM-1).

Reason not incorporated: IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections has been removed.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Stack Dimensions (feet)	Flow Rate (acfm)	Temperature (°F)
002	GL-01	126	7.3	58400	800
003	GL-03	126	3.0	20000	800
006	GL-05	100	2.0	8500	160
005A	PB-1	43.3	2.0	31280	385
005B	PB-2	43.3	2.0	31280	385
005C	PB-3	43.3	2.0	31280	385
001	Pickle Line	94	2.33	13000	185
007	Pickle Line Scale Breaker	24	1.6 x 2.1	10590	70
004	RCM-1	75	9	130000	140

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1-24).

County Attainment Status

The source is located in Vigo County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective February 6, 2006, for the Terre Haute area, including Vigo County, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

- (a) Vigo County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard.
- (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.
- (f) **Fugitive Emissions**
 The primary source does not fall under one of the twenty-eight (28) listed source categories. Therefore, fugitive emissions are not counted toward PSD applicability for the primary source. However, the batch annealing system, reversing cold rolling mill and temper mill fall under one of the twenty-eight (28) listed source categories and are considered "nested" within a nonlisted source. Therefore, the fugitive emissions from the batch annealing system, reversing cold rolling mill, and temper mill located at this source are counted for purposes of determining whether a source is a major source under PSD. In addition, fugitive emissions from the three package boilers are counted for purposes of

determining whether a source is a major source under PSD since there are New Source Performance Standards that were in effect on August 7, 1980, applicable to these boilers.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

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

HAPs	tons/year
HCL	>10
Pb	<10
Benzene	<10
Dichlorobenzene	<10
Formaldehyde	<10
Hexane	<10
Toluene	<10
Cadmium	<10
Chromium	<10
Manganese	<10
Nickel	<10
Total	>25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM-10, NO_x and CO is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (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 equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (d) **Fugitive Emissions**
The primary source does not fall under one of the twenty-eight (28) listed source categories. Therefore, fugitive emissions are not counted toward PSD applicability for the primary source. However, the batch annealing system, reversing cold rolling mill and temper mill fall under one of the twenty-eight (28) listed source categories and are considered "nested" within a nonlisted source. Therefore, the fugitive emissions from the batch annealing system, reversing cold rolling mill, and temper mill located at this source are counted for purposes of determining whether a source is a major source under PSD. In addition, fugitive emissions from the three package boilers are counted for purposes of determining whether a source is a major source under PSD since there are New Source Performance Standards that were in effect on August 7, 1980, applicable to these boilers.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM-10	1.0
SO ₂	0
VOC	1.0
CO	13
NO _x	8.0
Lead	0.0

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

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

In a letter dated July 12, 2000, US EPA Region V ruled that a source such as CSN, LLC (formerly known as Heartland Steel) should be considered as having a nested source when determining PSD applicability. The entire operation is compared to the 250 ton per year threshold for sources that are not in one of the twenty-eight (28) listed source categories. The nested source portion is one of the twenty-eight (28) listed source categories (Iron and Steel Mill Plant category) and therefore the emissions from the nested source are compared to the one hundred (100) tons per year threshold. All operations with a two-digit SIC Code of 33 are considered as part of the nested source. The operations that fall into this SIC Code are: Batch Annealing (SIC 3398); Reversing Cold Rolling Mill (SIC 3316); and the Temper Mill (SIC 3398). The tables below show the limited potential to emit of the entire source and the nested source portion.

Entire Source

Process/Emission Unit	Potential to Emit (tons/year)					
	PM	PM10	SO ₂	NO _x	VOC	CO
GL-02, GL-03	1.7	1.9	2.7	53.2	1.4	9.0
GL-05	9.6	9.6	–	–	–	–
PB-1,2, & 3	2.9	3.3	4.6	91.4	2.4	37
PL-1, Scale Breaker	11.93	11.93	–	–	–	–
BA-01-BA09	1.0	1.8	2.5	36.2	1.3	19.9
RCM-1	95.0	95.0	–	–	–	–
Insignificant Activities (GL-01, GL-04, GL-06, GL-08, TM-1, Space Heaters & Emergency Generators)	3.51	4.33	5.3	53.1	5.8	23.7
Total	125.54	127.86	15	231.7	10.9	101.2
Major Source Threshold	250	250	250	250	250	250

Nested Source

Process/Emission Unit	Potential to Emit (tons/year)					
	PM	PM10	SO ₂	NO _x	VOC	CO
BA-01-BA09	1.0	1.8	2.5	36.2	1.3	19.9
RCM-1	95	95	–	–	–	–
TM-1	0.016	0.043	–	–	–	–
Total	96	96.8	2.5	36.2	1.3	19.9
Major Source Threshold	100	100	100	100	100	100

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant for the entire source are less than two hundred fifty (<250) tons per year, and
- (b) The emissions of each criteria pollutant for the nested source are less than one hundred (<100) tons per year, and it is one of the twenty-eight (28) listed source categories.

- (c) The primary source does not fall under one of the twenty-eight (28) listed source categories. Therefore, fugitive emissions are not counted toward PSD applicability for the primary source. However, the batch annealing system, reversing cold rolling mill and temper mill fall under one of the twenty-eight (28) listed source categories and are considered "nested" within a nonlisted source. Therefore, the fugitive emissions from the batch annealing system, reversing cold rolling mill, and temper mill located at this source are counted for purposes of determining whether a source is a major source under PSD. In addition, fugitive emissions from the three package boilers are counted for purposes of determining whether a source is a major source under PSD since there are New Source Performance Standards that were in effect on August 7, 1980, applicable to these boilers.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
PB-1/NOx	Low NOx burners	N	29.7	29.7	100	N	N
PB-2/NOx	Low NOx burners	N	29.7	29.7	100	N	N
PB-3/NOx	Low NOx burners	N	29.7	29.7	100	N	N
PL-1/HCL	Wet Scrubber	Y	22.8	1.14	10	N	N
PL-1, Scale Breaker/PM/PM10	Baghouse	Y	119.3	11.93	100	Y	N
BA-01/NOx	Low NOx burners	N	4.02	4.02	100	N	N
BA-02/NOx	Low NOx burners	N	4.02	4.02	100	N	N
BA-03/NOx	Low NOx burners	N	4.02	4.02	100	N	N
BA-04/NOx	Low NOx burners	N	4.02	4.02	100	N	N
BA-05/NOx	Low NOx burners	N	4.02	4.02	100	N	N

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
BA-06/NOx	Low NOx burners	N	4.02	4.02	100	N	N
BA-07/NOx	Low NOx burners	N	4.02	4.02	100	N	N
BA-08/NOx	Low NOx burners	N	4.02	4.02	100	N	N
BA-09/NOx	Low NOx burners	N	4.02	4.02	100	N	N
RCM-1/ PM/PM10	Progressive Purification Filter System	Y	14642	146.2	100	Y	Y

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to Pickle Line Scale Breaker identified as PL-1 and the Two Stand Reversing Cold Mill (RCM-1) for PM₁₀ upon issuance of the Title V Renewal. A CAM plan will be incorporated into this Part 70 permit renewal.

- (b) The three Package Boilers identified as PB-1 through PB-3 are subject to the New Source Performance Standard for Small Industrial-Commercial Institutional Steam Generating Unit, 40 CFR 60 Subpart Dc, which is incorporated by reference as 326 IAC 12. These boilers are subject to this rule because they were constructed after June 9, 1989 and have a heat input capacity of less than 100 million Btu per hour, but greater than 10 million Btu per hour.

Nonapplicable portions of the NSPS will not be included in the permit. Package Boilers PB-1, PB-2, and PB-3 are subject to the following portions of Subpart Dc.

40 CFR 60.48c (g)

- (c) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Steel Pickling -- HCL Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC).

Non applicable portions of the NESHAP will not be included in the permit. The Pickle Line, identified as PL-1, is subject to the following portions of Subpart CCC.

- (1) 40 CFR 63.1155 (a)(1), (b), (c)
- (2) 40 CFR 63.1156
- (3) 40 CFR 63.1158 (a)
- (4) 40 CFR 63.1159 (b)
- (5) 40 CFR 63.1160 (a), (b)(1)(2)
- (6) 40 CFR 63.1161 (a) and (b)
- (7) 40 CFR 63.1162 (a) and (c)
- (8) 40 CFR 63.1163 (a)(4), (b), (c), (d), (e)
- (9) 40 CFR 63.1164
- (10) 40 CFR 63.1165

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

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

- (a) The PM and PM₁₀ emissions from the Galvanizing Line Spray Cleaning section identified as GL-05, shall not exceed 2.19 pounds per hour, each.
- (b) The PM and PM₁₀ emissions from the Pickle Line Scale Breaker baghouse (stack 007) shall not exceed 2.72 pounds per hour.
- (c) The PM and PM₁₀ emissions from the Two Stand Reversing Cold Mill (RCM-1) shall not exceed 21.7 pounds per hour. (Note: This limit is more stringent than the one required by 326 IAC 6.5).

Compliance with these PM and PM₁₀ limits in conjunction with the total potential to emit of PM and PM₁₀ from the rest of the source, shall ensure that the source-wide PM and PM₁₀ emissions are less than 250 tons per twelve consecutive month period and the PM and PM₁₀ emissions of the nested portion are less than 100 tons per twelve consecutive month period, rendering the requirements of 326 IAC 2-2 (PSD) not applicable

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2006 and every 3 years after. Therefore, the next emission statement for this source must be submitted by July 1, 2006. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

CSN, LLC is not located in the small area specified in 326 IAC 5-1-1 (c) (8). Therefore, they are not subject to the more stringent requirements under 326 IAC 5-1-2 (2).

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is located in Vigo County. This source is not located in the area listed in 326 IAC 6-5-1(a)(2)(F). The source does not have particulate fugitive emissions that exceed 25 tons per year Pursuant to 326 IAC 6-5-7(d), this source is not subject to the requirements of 326 IAC 6-5.

State Rule Applicability – Individual Facilities

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

The operation of the Pickle Line will emit greater than ten (10) tons per year for a single HAP (HCL); however, pursuant to 326 IAC 2-4.1-1(b)(2), because this Pickle Line is specifically regulated by NESHAP 40 CFR 63, Subpart CCC, which was issued pursuant to Section 112(d) of the CAA, this Pickle Line is exempt from the requirements of 326 IAC 2-4.1.

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

- (a) Pursuant to 326 IAC 6-3-1 (b) (14), the Batch Annealing System is exempt from 6-3-2 because it has the potential to emit less than 0.551 pounds of particulate matter per hour.
- (b) Pursuant to 326 IAC 6-3-1 (c), 326 IAC 6-3-2 does not apply if a particulate matter limitation established in 326 IAC 6.5 is more stringent. A comparison of the 6-3-2 limit and the 6.5 limit are summarized in the table below:

Process	Process Weight Rate (tons/hr)	6-3-2 Limit (lbs/hr)	Air Flow (cfm)	6.5 Limit (lbs/hr)
GL-02	70	47.8	58400	15.0
GL-03	70	47.8	20000	5.1
GL-05	70	47.8	8500	2.2
PL-1	300	63.0	13000	3.34
Pickle Line Scale Breaker	300	63.0	10590	2.7
RCM-1	200	58.5	130000	33.4

The 6-3-2 limit was calculated using the following formula:

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

$$E = 55.0 P^{0.11} - 40$$

and where E = rate of emission in pounds per hour
 and P = process weight rate in tons per hour

The 6.5 limit was calculated using the following equation:

$$PM \text{ Limit} = .03 \text{ gr/ft}^3 \times 1\text{lb}/7000 \text{ gr} \times \text{Exhaust flow rate ft}^3/\text{min} \times 60 \text{ min}/\text{hour}$$

According to the calculations above, 326 IAC 6.5 limit is the more stringent, and therefore 326 IAC 6-3-2 does not apply to these processes.

326 IAC 6.5 (Particulate Matter Limitations except Lake County)

326 IAC 6.5 is applicable to this source since it is located in Vigo county.

- (a) Pursuant to 326 IAC 6.5-1-2 (b) (3) (formerly 326 IAC 6-1-2 (b)), particulate matter (PM) emissions from the boilers (PB-1, PB-2, and PB-3) shall be limited to 0.01 grain per dry standard cubic foot.
- (b) Pursuant to 326 IAC 6.5-1-2 (a), each of the units in the Galvanizing Line, the Pickle Line Scale Breaker, the Batch Annealing System (BA01-BA-09), and Temper Mill (TM-1), shall not discharge any gases containing more than 0.03 grain per dry standard cubic foot of particulate matter.

The mist eliminator for PM and PM₁₀ control shall be in operation at all times when the Galvanizing Line Spray Cleaning system is in operation.

The Wheelabrator baghouse controlling the Pickle Line Scale Breaker shall be in operation at all times when the Pickle Line Scale Breaker is in operation.

326 IAC 10-1 (Nitrogen Oxide Emission Requirements)

This source is not located in Clark or Floyd County. Therefore, it is not subject to the requirements of 326 IAC 10-1.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7(Part 70) 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 monitoring requirements applicable to this source are as follows:

(a) Testing:

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement
Galvanizing Line Spray Cleaner System (GL-05)	Mist Eliminator	May 14, 2009	PM/PM10	Every Five Years	0.03 grain/dscf
Pickle Line Scale Breaker	Wheelabrator Baghouse	180 days after issuance of this permit	PM/PM10	Every Five Years	0.03 grain/dscf
Two Stand Reversing Cold Mill (RCM-1)	Progressive Purification filter system	May 11, 2009	PM/PM10	Every Five Years	21.7 lbs/hour

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Wheelabrator Baghouse for the Pickle Line Scale Breaker (stack 007)	Water Pressure Drop	Daily	3.0 to 6.0 inches	Response Steps
	Visible Emissions Visible Emissions		Normal-Abnormal	
Mist Eliminator for GL-05	Water Pressure Drop	Daily	0.1 to 0.6 inches	Response Steps
Progressive Purification System	Water Pressure Drop	Daily	0.5 to 3.0 inches	Response Steps

These monitoring conditions are necessary because the mist eliminator for the Galvanizing Line Spray Cleaner, the progressive purification system for the Two Stand Reversing Cold Mill, and the baghouse for the Pickle Line Scale Breaker must operate properly to ensure compliance with 326 IAC 6.5, 326 IAC 2-7 (Part 70), and 40 CFR 64.2 (CAM).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit 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 September 25, 2007.

Conclusion

The operation of this steel processing plant shall be subject to the conditions of the attached Part 70 Operating Permit No. T 167-25335-00120.

Appendix A: Emission Summary
Uncontrolled Potential to Emit (tons/yr)

Company Name: CSN,LLC

Address: 455 West Industrial Drive, Terre Haute, Indiana 47802

Permit #: T 167-25335-00120

Reviewer: Timothy R. Pettifor

Date: 8/18/2008

Uncontrolled Potential to Emit (tons/year)							
Process/ Emission Unit	PM	PM10	SO2	NOx	VOC	CO	HAPs
GL-02, GL-03	1.7	1.9	2.7	53.2	1.4	21.5	4.83E-01
GL-05	38.3	38.3	–	–	–	–	–
PB-1,2,&3	2.8	3.3	4.5	89.2	2.4	36.1	8.30E-01
PL-1, Scale Breaker	119.3	119.3	–	–	–	–	22.8
BA-01-BA-09	1.0	1.8	2.5	36.2	1.3	19.9	4.47E-01
RCM-1	14642	14642	–	–	–	–	–
Insignificant Activities (GL-01,GI-04, GL-06, GL-08, TM-1, Space Heater, & Emergency Generators	3.51	4.33	5.3	53.1	5.8	23.7	2.04
Total	14808.6	14810.9	15	231.7	10.9	101.2	26.6

**Appendix A: Emission Summary
Uncontrolled Potential to Emit (tons/yr)**

Company Name: CSN,LLC

Address: 455 West Industrial Drive, Terre Haute, Indiana 47802

Permit #: T 167-25335-00120

Reviewer: Timothy R. Pettifor

Date: 8/18/2008

*Limited Potential to Emit (tons/year)							
Process/ Emission Unit	PM	PM10	SO2	NOx	VOC	CO	HAPs
GL-02, GL-03	1.7	1.9	2.7	53.2	1.4	21.5	4.83E-01
GL-05	9.6	9.6	–	–	–	–	–
PB-1,2,&3	2.8	3.3	4.5	89.2	2.4	36.1	8.30E-01
PL-1, Scale Breaker	11.93	11.93	–	–	–	–	22.8
BA-01-BA-09	1.0	1.8	2.5	36.2	1.3	19.9	4.47E-01
RCM-1	95	95	–	–	–	–	–
Insignificant Activities (GL-01,GI-04, GL-06, GL-08, TM-1, Space Heater, & Emergency Generators	3.51	4.33	5.3	53.1	5.8	23.7	2.04
Total	125.54	127.86	15	231.7	10.9	101.2	26.6

*PM/PM10 limits are required by 326 IAC 6.5. RCM-1 is further limited so 326 IAC 2-2 does not apply.

Appendix A: Emissions Calculations
GL-01, GL-04 Natural Gas Combustion Only (2.0 MMBtu/hr each)
MM BTU/HR <100

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.0

35.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	50.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	0.9	0.1	1.5

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 GL-01, GL-04 Natural Gas Combustion Only
 MM BTU/HR <100
 HAPs Emissions**

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.679E-05	2.102E-05	1.314E-03	3.154E-02	5.957E-05

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	8.760E-06	1.927E-05	2.453E-05	6.658E-06	3.679E-05

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
GL-02, GL-03 Natural Gas Combustion Only
MM BTU/HR <100**

Unit	MMBtu/hr
GL-02	45.3
GL-03	13.2
Total	58.5

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 1/25/2008

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

58.5

512.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	1.9	7.6	0.6	50.0 **see below	5.5	84.0
	0.5	1.9	0.2	12.8	1.4	21.5

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 6 for HAPs emissions calculations.

Appendix A: Emissions Calculations
GL-02, GL-03 Natural Gas Combustion Only Galvanizing Line
MM BTU/HR <100
HAPs Emissions

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 1/25/2008

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.381E-04	3.075E-04	1.922E-02	4.612E-01	8.712E-04

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.281E-04	2.819E-04	3.587E-04	9.737E-05	5.381E-04

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
LPG-Propane - GL-01 & GL-04
(Heat input capacity: < 10 MMBtu/hr)

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

Heat Input Capacity Potential Throughput SO2 Emission factor = 0.10 x S
MMBtu/hr kgals/year S = Sulfur Content = 9.60 grains/100ft³

4.00 382.95

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.4	0.4	1.0 (0.10S)	14.0	0.5 **TOC value	1.9
Potential Emission in tons/yr	0.1	0.1	0.2	2.7	0.1	0.4

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well. Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

**The VOC value given is total organic compounds (TOC). The methane emission factor is 0.2 lb/kgal.

GL-01 & GL-04 propane calculations are separated from the other combustion units in the galvanizing line because their capacity is < 10 MMBtu/hr. Emission factors for units < 10 MMBtu/hr are different from units between 10 MMBtu/hr and 100 MMBtu/hr.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

LPG-Propane - GL-02 & GL-03
 (Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

Heat Input Capacity Potential Throughput SO2 Emission factor = 0.10 x S
 MMBtu/hr kgals/year S = Sulfur Content = grains/100ft³

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO2 (0.10S)	NOx	VOC **TOC value	CO
Potential Emission in tons/yr	0.6	0.6	1.0	19.0	0.5	3.2
	1.7	1.7	2.7	53.2	1.4	9.0

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well. Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

**The VOC value given is total organic carbon (TOC). The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Galvanizing Line Spray Cleaning Section (GL-05), Induction Melting Section (GL-06), Chromate Spray Section (GL-08)**Company Name:** CSN, LLC**Address City IN Zip:** 455 West Industrial Drive, Terre Haute, Indiana 47802**Permit Number:** T 167-25335-00120**Reviewer:** Timothy R. Pettifor**Date:** 8/18/2008**Line Spray Cleaning Section (GL-05)**

*Outlet Grain Loading: 0.03 gr/dscf

Stack 006 Flow Rate: 8500 acfm

Control Efficiency: 75%

Controlled PM/PM10 Emissions:0.03 gr/dscf x 8500 acfm x 60 min/hour x 1 lb/7000 grains x 8760 hours/year x 1 ton/2000 lbs = **9.57 tons/yr****Uncontrolled PM/PM10 Emissions:**9.57 tons/yr / (1 - 0.75) = **38.3 tons/yr**

*Outlet Grain Loading limited by 326 IAC 6.5.

Induction Melting Section (GL-06)

Maximum Capacity: 5.1 tons/hour

PM/PM10 Emission Factor: 0.005 lbs/ton

PM/PM10 Emissions: 5.1 tons/hour x 0.005 lbs/ton product x 8760 hours /year x 1 ton/2000 lbs = **0.11 tons/yr**

VOC Emission Factor: 0.18 lbs/ton

VOC Emissions: 5.1 tons/hour x 0.18 lbs/ton product x 8760 hours /year x 1 ton/2000 lbs = **4.0 tons/yr**

Emission factors are from WebFIRE. PM/PM10= SCC 3-04-008-70. VOC= 3-04-008-43.

Chromate Spray Section (GL-08)

Maximum Chromate Spray used: 0.37 lbs/hr

PM/PM10, Chromium Compound Emissions: 0.37 lbs/hr x 8760 hrs/yr x 1 ton/2000 = **1.6 tons/yr**

Appendix A: Emission Calculations
Pickle Line Emissions

Company Name: CSN, LLC
Address City IN Zip 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

Pickle Line HCL Emissions (Stack 001)

* Average Emission Rate: 0.26 lbs HCL,PM/hour
Controlled HCL Emissions: 0.26 lbs HCL,PM/hour x 8760 hours/year x 1ton/2000 lbs = **1.14 tons/year**
Collection Efficiency: 95%
Uncontrolled Emissions: 1.13 tons/year/(1-.95) = **22.8 tons/year**

*Outlet emission rate was taken from a stack test conducted on June 1, 2006 and approved by IDEM OAQ on August 2, 2006.

Pickle Line Scale Breaker

*Outlet Grain Loading: 0.03 gr/dscf
Stack 007 Flow: 10590 acfm
Control Efficiency: 90%
Controlled PM/PM10 Emissions: 0.03 gr/acf x 10590 acfm x 60 min/hr x 1 lb/7000 gr x 8760 hr/yr x 1 ton/2000 lbs = **11.93 tons/yr.**
Uncontrolled PM/PM10 Emissions: 11.93 tons/year/(1-.90) = **119.3 tons/yr**

*Outlet Grain Loading limited by 326 IAC 6.5.

The Pickle Line electrostatic oiler and Welding/Shearing operations are activities that meet the definition of insignificant activities (< 25 lbs/day of CO or Nox; < 5 pounds/hour or 25 lbs/day SO₂; < 3 lbs/hr or 15 lbs/day VOC; < 3.29 lbs/day or 0.6 tons/yr lead).

Appendix A: Emissions Calculations
Natural Gas Combustion Only, PB-1, PB-2, PB-3 (32.7 MMBtu/hr each)
MM BTU/HR <100

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

98.10

859.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	50.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.8	3.3	0.3	21.5	2.4	36.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 12 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only, PB-1, PB-2, PB-3 (33.48 MMBtu/hr each)
MM BTU/HR <100
HAPs Emissions

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.023E-04	5.156E-04	3.223E-02	7.734E-01	1.461E-03

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.148E-04	4.726E-04	6.015E-04	1.633E-04	9.023E-04

Methodology is the same as page 11.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
LPG-Propane - PB-1, PB-2, PB-3 (32.7 MMBtu/hr each)
(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

Heat Input Capacity Potential Throughput SO2 Emission factor = 0.10 x S
MMBtu/hr kgals/year S = Sulfur Content = 9.60 grains/100ft³

98.10 9391.87

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO2 (0.10S)	NOx	VOC **TOC value	CO
Potential Emission in tons/yr	2.8	2.8	4.5	89.2	2.3	15.0

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well. Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

**The VOC value given is total organic compounds (TOC). The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Appendix A: Emission Calculations
LPG-Propane - Batch Annealing Furnaces
(Heat input capacity: < 10 MMBtu/hr)

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25336-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

Heat Input Capacity Potential Throughput SO2 Emission factor = 0.10 x S
MMBtu/hr kgals/year S = Sulfur Content = grains/100ft³

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.4	0.4	1.0 (0.10S)	14.0	0.5 **TOC value	1.9
Potential Emission in tons/yr	1.0	1.0	2.5	36.2	1.3	4.9

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well. Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

**The VOC value given is total organic compounds (TOC). The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only, Batch Annealing System
MM BTU/HR <100

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

54.0

473.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	50.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.4	1.8	0.1	11.8	1.3	19.9

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 16 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only, Batch Annealing System
MM BTU/HR <100
HAPs Emissions

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.967E-04	2.838E-04	1.774E-02	4.257E-01	8.042E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.183E-04	2.602E-04	3.311E-04	8.988E-05	4.967E-04

Methodology is the same as page 15.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Two Stand Reversing Cold Mill, Temper Mill (TM-1)

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

Two Stand Reversing Cold Mill (RCM-1)

*Outlet Grain Loading: 0.03 gr/dscf
Stack 004 Flow Rate: 130000 acfm
Control Efficiency: 99%
Controlled PM/PM10 Emissions:
 $0.03 \text{ gr/dscf} \times 130000 \text{ acfm} \times 60 \text{ min/hour} \times 1 \text{ lb/7000 grains} \times 8760 \text{ hours/year} \times 1 \text{ ton/2000 lbs} = \mathbf{146.42 \text{ tons/yr}}$
Uncontrolled PM/PM10 Emissions:
 $\text{tons/yr}/(1-.99) = \mathbf{14642 \text{ tons/yr}}$

*Outlet Grain Loading limited by 326 IAC 6.5.

Temper Mill (TM-1)

Average lbs of steel/hour during stack test: 128737 lbs/hour
Maximum lbs of steel/hour permitted: 158000 lbs/hour
PM Emission rate from stack test: .003 lbs/hour
Potential to Emit PM: $.003 \text{ lbs/hour} \times (158000/128737) \times 1 \text{ ton/2000 lbs} \times 8760 \text{ hrs/yr} = \mathbf{0.016 \text{ tons/year}}$
PM10 Emission rate from stack test: 0.008 lbs/hour
Potential to Emit PM10: $0.008 \text{ lbs/hour} \times (158000/128736) \times 1 \text{ ton/2000 lbs} \times 8760 \text{ hrs/yr} = \mathbf{0.043 \text{ tons/year}}$

A stack test was conducted on December 20, 2005 to determine PM & PM10 emissions from this unit. This test was approved by IDEM OAQ on February 21, 2006.

Appendix A: Emission Calculations
LPG-Propane - Space Heaters
(Heat input capacity: < 10 MMBtu/hr)

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25336-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

Heat Input Capacity Potential Throughput SO2 Emission factor = 0.10 x S
MMBtu/hr kgals/year S = Sulfur Content = 9.60 grains/100ft³
46.20 4423.08

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO2 (0.10S)	NOx	VOC **TOC value	CO
Potential Emission in tons/yr	0.9	0.9	2.1	31.0	1.1	4.2

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only 7 Space Heaters (6.6 MMBTU/Hr each)
MM BTU/HR <100

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

46.2

404.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.4	1.5	0.1	20.2	1.1	17.0

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 20 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only 7 Space Heaters (6.6 MMBTU/Hr each)
MM BTU/HR <100
HAPs Emissions

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.249E-04	2.428E-04	1.518E-02	3.642E-01	6.880E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.012E-04	2.226E-04	2.833E-04	7.690E-05	4.249E-04

Methodology is the same as page 19.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Insignificant Combustion
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: CSN. LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.0

26.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	1.3	0.1	1.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 22 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Insignificant Combustion
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions**

Company Name: CSN. LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.759E-05	1.577E-05	9.855E-04	2.365E-02	4.468E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.570E-06	1.445E-05	1.840E-05	4.993E-06	2.759E-05

Methodology is the same as page 21.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel**

Two Emergency Generators (rated at 1447 Bhp each)

Company Name: CSN, LLC
Address City IN Zip: 455 West Industrial Drive, Terre Haute, Indiana 47802
Permit Number: T 167-25335-00120
Reviewer: Timothy R. Pettifor
Date: 8/18/2008

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity
MM Btu/hr

S= = WEIGHT % SULFUR

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.1	0.0573	0.5 (1.01S)	3.2 **see below	0.1	0.85
Potential Emission in tons/yr	0.5	0.3	2.5	15.6	0.4	4.1

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

B. Emissions calculated based on output rating (hp)

Heat Input Capacity
Horsepower (hp)

Potential Throughput
hp-hr/yr

S= = WEIGHT % SULFUR

Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.0007	0.00070	0.0040 (.00809S)	0.024 **see below	0.00071	0.00550
Potential Emission in tons/yr	0.5	0.5	2.9	17.4	0.5	4.0

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr

Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.

An average conversion factor of 1hp-hr = 7,000Btu is provided below.

Methodology

Potential Throughput (hp-hr/yr) = hp * 500 hr/yr [500 hours used since it is only for emergency use]

Emission Factors are from AP 42 (Supplement B 10/96) Table 3.4-1 and Table 3.4-2

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.