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

TO: Interested Parties / Applicant

DATE: June 16, 2009

RE: Steel Warehouse Company, LLC / 141-27412-00155

FROM: Matthew Stuckey, 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 according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07

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Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

Steel Warehouse Company, LLC.
2722 W. Tucker Drive
South Bend, Indiana 46624

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

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

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

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

Operation Permit No.: F141-27412-00155	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 16, 2009 Expiration Date: June 16, 2014

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

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

The Permittee owns and operates a stationary steel pickling plant.

Source Address:	2722 W. Tucker Dr., South Bend, Indiana 46619
Mailing Address:	2722 W. Tucker Dr., South Bend, Indiana 46619
General Source Phone Number:	574-236-1315
SIC Code:	3316
County Location:	St. Joseph, Area East of Pine Road and North of Kern Road.
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One steel pickling line consisting of the following:

(1) One (1) pickling process to remove surface impurities from coiled steel, identified as P-1, constructed in 1987, maximum capacity of 170 tons of steel coils per hour, equipped with two stage packed bed scrubber CE1 and CE2, followed by a demister, exhausting through stack S-2;

(2) Two (2) HCl storage tanks, identified as T-1 and T-2, constructed in 1987, each with a maximum storage capacity of 13,000 gallons;

(3) Three (3) waste acid storage tanks. One of the tanks has a maximum storage capacity of 8,000 gallons and the other two each have a maximum storage capacity of 10,000 gallons. These tanks were constructed in 1987;

NOTE: This pickling line is controlled by two (2) stage packed bed scrubber CE1 and CE2, followed by a chevron type demister pad, exhausting via stack S-2.

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

This stationary source also includes the following insignificant activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) One (1) 5 MMBtu per hour natural gas-fired boiler constructed in 1987;

(2) One (1) 8.4 MMBtu per hour natural-gas fired boiler constructed in 1999.

(b) Vessels storing the following:

(1) Lubricating oils;

(2) Hydraulic oils;

(3) Machining oils; and

(4) Machining fluids.

(c) Application of:

(1) oils;

(2) greases;

(3) lubricants; and

(4) nonvolatile materials;

as temporary protective coatings.

(d) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6, and using halogenated HAP less than 5% by weight.

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

(1) Brazing;

(2) Cutting torches;

(3) Soldering; and

(4) Welding.

(f) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.

(g) Paved and unpaved roads and parking lots with public access.

(h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including the following:

(1) Catch tanks;

(2) Temporary liquid separators;

(3) Tanks; and

(4) Fluid handling equipment.

(i) Blowdown for the following:

(1) Sight glass;

(2) Boiler;

(3) Cooling tower;

(4) Compressors; and

(5) Pumps.

(j) Activities associated with emergencies, including the following:

(1) Emergency Diesel generators not exceeding 1600 horsepower, constructed prior to July 1, 2006.

(k) Other categories with emissions below insignificant thresholds:

(1) One (1) leveler plate line with a capacity of 50,000 pounds per hour and connected to a baghouse, with 16 ounce polyester bag material and jet pulse method of cleaning.

(2) One (1) 12,000 gallon diesel fuel tank with a throughput of 756,000 gallons per year. This tank was constructed in 1990.

(3) One (1) small annealing operation using a maximum of one gallon of annealing solution per month.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, F141-27412-00155, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

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

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

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office 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 and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877**.**

(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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

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

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

(a) All terms and conditions of permits established prior to F141-27412-00155 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

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

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

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

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

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

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

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3.

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations)(Plant is located East of Pine Road and North of Kern Road), 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

C.7 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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later. 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

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

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

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; 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 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

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

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

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

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One steel pickling line consisting of the following:

(1) One (1) pickling process to remove surface impurities from coiled steel, identified as P-1, constructed in 1987, maximum capacity of 170 tons of steel coils per hour, equipped with two stage packed bed scrubber CE1 and CE2, followed by a demister, exhausting through stack S-2;

(2) Two (2) HCl storage tanks, identified as T-1 and T-2, constructed in 1987, each with a maximum storage capacity of 13,000 gallons;

(3) Three (3) waste acid storage tanks. One of the tanks has a maximum storage capacity of 8,000 gallons and the other two each have a maximum storage capacity of 10,000 gallons. These tanks were constructed in 1987;

NOTE: This pickling line is controlled by two (2) stage packed bed scrubber CE1 and CE2, followed by a chevron type demister pad, exhausting via stack S-2.

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

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

D.1.1 PM, PM-10, and PM2.5 Limitations [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7(Part 70 Program) not applicable, the PM, PM_{10}, and $PM_{2.5}$ emission rates from the emission units listed below shall be limited as follows:

(a) The total steel processed in the steel pickling line shall not exceed 1,489,200 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) PM emissions from the scrubber used in conjunction with the steel pickling line, P-1 shall not exceed 0.0135 pounds per ton of steel processed.

(c) PM_{10} emissions from the scrubber used in conjunction with the steel pickling line, P-1 shall not exceed 0.0135 pounds per ton of steel processed.

(d) $PM_{2.5}$ emissions from the scrubber used in conjunction with the steel pickling line, P-1 shall not exceed 0.0135 pounds per ton of steel processed.

Compliance with the limits in (a) through (d), in conjunction with the limited potential to emit from other emission units at this source, shall limit the source-wide PTE of PM emissions from the source to less than 250 tons per year, $PM_{10,}$ and $PM_{2.5}$ to less than 100 tons per twelve (12) consecutive month period each.

D.1.2 HAP Limitations [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-2 and 326 IAC 2-7 not applicable, the emission rates from the emission units listed below shall be limited as follows:

(a) HCl emissions from the scrubber used in conjunction with the steel pickling line, P-1 shall not exceed 2.28 pounds per hour.

(b) The total HAPs emissions from the scrubber used in conjunction with the steel pickling line, P-1 shall not exceed 5.7 pounds per hour.

Compliance with the limits in (a) through (b), in conjunction with the limited potential to emit from other emission units at this source, shall limit the source-wide PTE of single HAP emissions from the source to less than 10 tons per twelve (12) consecutive month period, and combined HAPs to less than 25 tons per twelve (12) consecutive month period.

D.1.3 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2 (a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the steel pickling line, P-1 shall be limited to 0.03 grain per dry standard cubic foot (gr/dscf) of exhaust air.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-4(3)]

(a) In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM and HCl testing of two stage packed bed scrubber CE, controlling the particulate (PM) and HCl emissions associated with the pickling operation, P-1 which exhaust through stack S-2, once every five (5) years from the most recent valid compliance stack test. This testing shall be conducted utilizing methods as approved by the Commissioner.

(b) In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM_{10} and $PM_{2.5}$ testing of two stage packed bed scrubber CE, controlling the PM_{10} and $PM_{2.5}$ emissions associated with the pickling operation, P-1 which exhaust through stack S-2

(1) Within 180 days of publication of the new or revised condensable PM test method(s) referenced in the U. S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers ($PM_{2.5}$), signed on May 8th, 2008.

or

(2) Five (5) years from the most recent valid compliance stack test, which ever is later. This testing shall be conducted utilizing methods as approved by the Commissioner.

These tests shall be repeated at least once every five (5) years from the date of this most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM10 includes filterable and condensable PM.

D.1.6 Particulate Control

In order to comply with D.1.1, D.1.2 and D.1.3(a), the two (2) packed bed scrubber CE1 and CE2 for PM, PM-10, PM2.5 and HCl control shall be in operation and control emissions from the steel pickling line at all times that the steel pickling line is in operation.

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

D.1.7 Visible Emissions Notations

(a) Visible emission notations of the steel pickling line stack exhaust 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 Exceedences. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedences shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring of Scrubber Operational Parameters

(a) The Permittee shall record the pressure drop across the scrubber used in conjunction with the steel pickling line, at least once per day when the steel pickling line is in operation. When for any one reading, the pressure drop across the lower part of the scrubber (CE1) is outside the normal range of 4.9 to 6.7 inches of water, the pressure drop across the upper part of the scrubber (CE2) is outside the normal range of 0.4 and 1.3 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 Permittee shall record the scrubbing liquid and make-up water flow rates from the scrubbers used in conjunction with the steel pickling line, at least once per day when the steel pickling line is in operation. When for any one reading, the scrubber liquid flow rate is below 250 gallons per minute and the make-up water flow rate is below 17 gallons per minute 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 flow rate 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.

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

D.1.9 Scrubber Failure

In the event that a scrubber's failure has been observed:

The affected process will be shut down immediately until the failed unit has been 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). Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.1(a), the Permittee shall maintain records of the total amount of metal throughput in the steel pickling line on a monthly basis.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the steel pickling line, P-1 stack exhaust S-2 once per day. 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).

(c) To document compliance with Condition D.1.8, the Permittee shall maintain records once per day of the following operational parameters during normal operation. The Permittee shall include in its daily record when the pressure drop reading, the scrubbing liquid and make-up water flow rates are not taken and the reason for the lack of a pressure drop reading and water flow rates reading (e.g. the process did not operate that day).

(1) Pressure drop across the scrubbers;

(2) Scrubbing liquid and make-up water flow rates.

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

D.1.11 Reporting Requirements

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) One (1) 5 MMBtu per hour natural gas-fired boiler constructed in 1987;

(2) One (1) 8.4 MMBtu per hour natural-gas fired boiler constructed in 1999.

(b) Vessels storing the following:

(1) Lubricating oils;

(2) Hydraulic oils;

(3) Machining oils; and

(4) Machining fluids.

(c) Application of:

(1) oils;

(2) greases;

(3) lubricants; and

(4) nonvolatile materials;

as temporary protective coatings.

(d) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6, and using halogenated HAP less than 5% by weight.

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

(1) Brazing;

(2) Cutting torches;

(3) Soldering; and

(4) Welding.

(f) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.

(g) Paved and unpaved roads and parking lots with public access.

SECTION D.2 FACILITY OPERATION CONDITIONS (CONTINUED)

(h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including the following:

(1) Catch tanks;

(2) Temporary liquid separators;

(3) Tanks; and

(4) Fluid handling equipment.

(i) Blowdown for the following:

(1) Sight glass;

(2) Boiler;

(3) Cooling tower;

(4) Compressors; and

(5) Pumps.

(j) Activities associated with emergencies, including the following:

(1) Emergency Diesel generators not exceeding 1600 horsepower, constructed prior to July 1, 2006.

(k) Other categories with emissions below insignificant thresholds:

(1) One (1) leveler plate line with a capacity of 50,000 pounds per hour and connected to a baghouse, with 16 ounce polyester bag material and jet pulse method of cleaning.

(2) One (1) 12,000 gallon diesel fuel tank with a throughput of 756,000 gallons per year. This tank was constructed in 1990.

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

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

D.2.1 Storage Vessels [40 CFR 60, Subpart Kb] [326 IAC 12]

The 12,000 gallon diesel storage tank listed above is subject to the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. There are no applicable control requirements for this storage tank; however, the source must comply with the applicable record keeping requirements specified in the Record Keeping Requirements conditions of this section. This tank is exempt from the General Provision (40 CFR 60, Subpart A), because it has a design capacity of less than 75m^3.

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

(a) Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) from each of the leveler plate, brazing, cutting torches, soldering, and welding operations shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

(b) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter (PM) from 5.0 MMBtu per hour natural gas fired boiler, shall not exceed 0.01 grain per dry standard cubic foot (gr/dscf).

(c) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter (PM) from 8.4 MMBtu per hour natural gas fired boiler, shall not exceed 0.01 grain per dry standard cubic foot (gr/dscf).

D.2.3 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a emissions unit for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser emissions unit shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a emissions unit for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage emissions unit must be internal such that articles are enclosed under the cover while draining. The drainage emissions unit may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning emissions unit shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

D.2.5 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain a record showing the dimension of the storage vessels and an analysis showing the capacity of the storage vessels.

(b) These records shall be maintained in accordance with Section C- General Record Keeping Requirements.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Steel Warehouse Company, LLC
Source Address: 2722 W. Tucker Drive, South Bend, Indiana 46619
Mailing Address: 2722 W. Tucker Drive, South Bend, Indiana 46619
FESOP Permit No.: F141-27412-00155

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Steel Warehouse Company, LLC
Source Address: 2722 W. Tucker Drive, South Bend, Indiana 46619
Mailing Address: 2722 W. Tucker Drive, South Bend, Indiana 46619
FESOP Permit No.: F141-27412-00155

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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Steel Warehouse Company, LLC
Source Address: 2722 W. Tucker Drive, South Bend, Indiana 46619
Mailing Address: 2722 W. Tucker Drive, South Bend, Indiana 46619
FESOP Permit No.: F141-27412-00155
Facility: Steel Pickling Line
Parameter: Total Weight of the metal processed
Limit: Less than 1,489,200 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Source Name: Steel Warehouse Company, LLC
Source Address: 2722 W. Tucker Drive, South Bend, Indiana 46624
Mailing Address: 2722 W. Tucker Dr., South Bend, IN 46619
FESOP Permit No.: F141-27412-00155

Months: _____ **to** _____ **Year:** _____

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".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit (MSOP) Transitioning to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	Steel Warehouse Company, LLC
Source Location:	2722 West Tucker Drive, South Bend, Indiana 46619
County:	St. Joseph
SIC Code:	3316
Operation Permit No.:	141-27412-00155
Permit Reviewer:	Swarna Prabha

This source operates a stationary steel pickling plant. Coils of steel are uncoiled and pickled to remove surface impurities. The steel is then rinsed prior to leaving the pickling operation.

On January 27, 2009, the Office of Air Quality (OAQ) received an application from Steel Warehouse Company, LLC related to the transition of a Minor Source Operating Permit (MSOP) to a FESOP due to the re-evaluation of the potential to emit of a single HAP from the Pickling line, based on emission rate determined during stack test.

Existing Approvals

Since the issuance of the FESOP Renewal 141-14639-00155 on March 22, 2002, the source has constructed or has been operating under the following additional approvals:

(a) Significant Permit Revision No. 141-23264-00155 issued on November 28, 2006;

(b) Administrative Amendment No. 141-25218-00155 issued on October 9, 2007; and

(c) Minor Source operating permit No.: 141-23263-00155 issued on August 27, 2008.

Due to this application, the source is transitioning from a MSOP to a FESOP.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Attainment effective July 19, 2007, 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]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including St. Joseph County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards

(1) 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.

(2) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate St. Joseph County as attainment for the 8-hour ozone standard.

(3) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
St. Joseph County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.

(c) Other Criteria Pollutants
St. Joseph County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
This source is a steel pickling plant; however, it is not considered a steel mill. Therefore, it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, and fugitive emissions are not counted toward the determination of PSD applicability.

Background and Description of Permitted Emission Units

On January 27, 2009, Steel Warehouse Company, LLC submitted an application to the OAQ requesting a transition from the existing MSOP Permit No. 141-23263-00155, issued on August 28, 2008 to a FESOP. In December 2008, stack test was conducted by the source. The HCl emissions before control were measured over the 10 tons per year. Therefore, Steel Warehouse Company requested to transition to a Federally Enforceable State Operating Permit (FESOP) instead of proceeding with a MSOP. During this review process the maximum capacity of the pickling process has been corrected to 170 tons of steel per hour from 150 tons per hour of steel. There are no other emission units added to the facility.

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

(a) One steel pickling line consisting of the following:

(1) One (1) pickling process to remove surface impurities from coiled steel, identified as P-1, constructed in 1987, maximum capacity of 170 tons of steel coils per hour, equipped with two stage packed bed scrubber CE1 and CE2, followed by a demister, exhausting through stack S-2;

(2) Two (2) HCl storage tanks, identified as T-1 and T-2, constructed in 1987, each with a maximum storage capacity of 13,000 gallons;

(3) Three (3) waste acid storage tanks. One of the tanks has a maximum storage capacity of 8,000 gallons and the other two each have a maximum storage capacity of 10,000 gallons. These tanks were constructed in 1987;

NOTE: This pickling line is controlled by two (2) stage packed bed scrubber CE1 and CE2, followed by a chevron type demister pad, exhausting via stack S-2.

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) One (1) 5 MMBtu per hour natural gas-fired boiler constructed in 1987;

(2) One (1) 8.4 MMBtu per hour natural-gas fired boiler constructed in 1999.

(b) Vessels storing the following:

(1) Lubricating oils;

(2) Hydraulic oils;

(3) Machining oils; and

(4) Machining fluids.

(c) Application of:

(1) oils;

(2) greases;

(3) lubricants; and

(4) nonvolatile materials;

as temporary protective coatings.

(d) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6, and using halogenated HAP less than 5% by weight.

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

(1) Brazing;

(2) Cutting torches;

(3) Soldering; and

(4) Welding.

(f) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.

(g) Paved and unpaved roads and parking lots with public access.

(h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including the following:

(1) Catch tanks;

(2) Temporary liquid separators;

(3) Tanks; and

(4) Fluid handling equipment.

(i) Blowdown for the following:

(1) Sight glass;

(2) Boiler;

(3) Cooling tower;

(4) Compressors; and

(5) Pumps.

(j) Activities associated with emergencies, including the following:

(1) Emergency Diesel generators not exceeding 1600 horsepower, constructed prior to July 1, 2006.

(k) Other categories with emissions below insignificant thresholds:

(1) One (1) leveler plate line with a capacity of 50,000 pounds per hour and connected to a baghouse, with 16 ounce polyester bag material and jet pulse method of cleaning.

(2) One (1) 12,000 gallon diesel fuel tank with a throughput of 756,000 gallons per year. This tank was constructed in 1990.

(3) One (1) small annealing operation using a maximum of one gallon of annealing solution per month.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations

Unrestricted Potential Emissions

The following table reflects the unlimited potential to emit (PTE) to emit of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Emissions (tons/year)
PM	Greater than 100
PM10[(1)]	Greater than 100
PM2.5[(1)]	Greater than 100
SO_2	Less than 100
VOC	Less than 25
CO	Less than 100
NO_x	Less than 100
HAPs	Greater than 25

[(1)] Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

(a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1 (29)) of PM, PM10 and PM2.5 is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. The source is subject to the provisions of 326 IAC2-7. However, the source has agreed to limit their PM, PM10 and PM2.5 to less than Title V levels, therefore the source will be issued a FESOP.

(b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of all HAP is greater than twenty-five (25) tons per year. Therefore the source would have been subject to the provisions of 326 IAC 2-7, however, because the source has agreed to limit emissions of HAP to less than the Title V major source threshold levels, the source will be issued a FESOP (326 IAC 2-8).

PTE of the Entire Source After Issuance of the EFSOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5	SO_2	NOx	VOC	CO	Single HAP	Combined HAPs
Steel Pickling Line**	100.52(1)	10.05(2)	10.05(2)	--	--	--	--	9.986(2) (HCl)	9.986
Natural Gas Combustion	0.11	0.45	0.45	0.04	5.87	0.32	4.93	0.11(Hexane)	0.12
Emergency Generator	0.87	0.87	0.87	0.81	12.35	1.01	2.66	negl.	negl.
Leveler Plate Line	0.54(1)	0.54(1)	0.54(1)	--	--	--	--	0	--
Diesel Storage Tank	--	--	--	--	--	1.00	--		--
Other Units (3)	Less than 14.0	Less than 14.0	Less than 14.0	0.03	5.87	0.32	4.93.	0.118	0.12
Fugitive Emissions	2.00	2.00	2.00	-	-	-	-	-	-
Total Emissions	Less than 118.04	Less than 27.04	Less than 27.37	0.88	24.09	2.65	12.52	9.986 (HCl)	<25
Part 70 Major Source Threshold	**N/A**	**100**	**-**	**100**	**100**	**100**	**100**	**10**	**25**
PSD Major Source Threshold	**250**	**250**	**250**	**250**	**250**	**250**	**250**	**N/A**	**N/A**

PTE after Production Limitation.
negl. = negligible

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
There are no PM2.5 Emission Factors in AP42 , PM10 = PM2.5

** Emission limits are to comply with 326 IAC 6.5-1-2 and 326 IAC 2-8-4 requirements.
(1) PM Emissions without control.
(2) Emissions after FESOP Limits.
(3) Other units include storage vessels, application of oils or lubricants, welding, degresing, trimmers, material collection equipment, various blow down operations, and a small annealing operation. As a worst-case scenario, it is assumed that these units each will emit no more than 15 lbs/day of VOC and 25 lbs/day of PM10 (assume PM = PM10 =PM2.5).

(a) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, or 326 IAC 2-7, and there was no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD and Part 70 Permit applicability.

(b) PSD Minor Limits [326 IAC 2-2]

(1) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the source has chosen to limit the source wide emissions of PM to less than 250 tons per twelve (12) consecutive month period.

(2) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the source has chosen to limit the source wide emissions of PM10, and PM2.5 to less than 100 tons per twelve (12) consecutive month period each.

(c) FESOP Status [326 IAC 2-8]
This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

The following emission units shall have their PM, $PM_{10,}$ $PM_{2.5}$ and HCl emissions limited such that units shall not exceed the emission limits specified in the following table at a production limit of 1,489,200 tons of steel per year:

Unit ID	Hourly PM Limit (lbs/ton) of steel	Hourly PM_{10} Limit (lbs/ton) of steel	Hourly $PM_{2.5}$ Limit (lbs/ton) of steel	Hourly HCl Limit (lbs/hr)
Pickling	0.0135	0.0135	0.0135	2.28

Compliance with these limits, combined with the potential to emit PM_{10} and $PM_{2.5}$ from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, and $PM_{2.5}$ to less than 100 tons per 12 consecutive month period, any single HAP to less than 10 tons per twelve (12) consecutive month period, and total HAP to less than twenty-five (25) tons per twelve consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

Federal Rule Applicability

New Source Performance Standards (NSPS)

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

(b) The requirements of New Source Performance Standards 40 CFR Part 60, Subpart K (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978) (326 IAC 12) and Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984) (326 IAC 12) are not included in this permit for the diesel fuel tank, because it has a storage capacity that is less than 40,000 gallons.

(c) The requirements of New Source Performance Standard 40 CFR Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction or Modification Commenced After July 23, 1984) (326 IAC 12) are not included in this permit for the diesel fuel tank, because it has a storage capacity that is less than 75 cubic meters.

(d) The two (2) natural gas-fired process boilers, rated at 5 and 8.4 MMBtu/hr each, installed in 1987 and 1999 respectively, the requirements of New Source Performance Standard 40 CFR 60, Subpart D (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which

Construction Is Commenced After August 17, 1971), Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units), and Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) are not included in this permit, because the each boiler has a heat input capacity less than 10 MMBtu per hour each. Also, boilers are subject to more stringent requirements of 326 IAC 6.5.

(e) The requirements of 40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) are not included in this permit because the emergency generator was constructed prior to July 1, 2006.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(f) The requirements of 40 CFR 63, Subpart T (National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning) are not included in this permit, because the material used in the degreaser does not have a total concentration of halogenated HAP solvents greater than 5 percent by weight.

(g) The requirements of 40 CFR 63, Subpart CCC (National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants) are not included in this permit, because this source is not a major source of HAPs.

(h) The requirements of 40 CFR 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) are not included in this permit because pursuant to 40 CFR 63.6590(b)(3), an existing emergency stationary RICE does not have to meet the requirements of this subpart or subpart A of this part. The emergency generator is existing emergency stationary RICE.

(i) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit.

Compliance Assurance Monitoring (CAM)

(j) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability

The following state rules are applicable to the source:

326 IAC 2-8-4 (FESOP)

FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP status above.

326 IAC 2-6 (Emission Reporting)

This source is located in St. Joseph County, is not required to have an operating permit under 326 IAC 2-7 and does not have lead emissions greater than five (5) tons per year. Therefore, the source is only subject to additional information requests as provided in 326 IAC 2-6-5.

326 IAC 5-1 (Opacity Limitations)

This plant is located in the area East of Pine Road and North of Kern Road in St. Joseph County. 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6-4 (Fugitive Dust Emissions)

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)

Although this source is located in the area east of Pine Road and north of Kern Road in St. Joseph County, it is not subject to the provisions of this rule, because the potential fugitive particulate emissions are less than 25 tons per year.

Steel Pickling Line

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following conditions shall apply to this steel pickling plant.

(1) PM-10 and PM2.5 Limitations:

(a) The steel processed in the steel pickling line shall not exceed 1,489,200 tons per twelve (12) consecutive month with compliance determined at the end of each month.

(b) The PM emissions from the scrubber used in conjunction with the steel pickling line, P-1 shall not exceed 0.0135 pounds per ton of steel processed.

(c) The PM10 emissions from the scrubber used in conjunction with the steel pickling line, P-1 shall not exceed 0.0135 pounds per ton of steel processed.

(d) The PM2.5 emissions from the scrubber used in conjunction with the steel pickling line, P-1 shall not exceed 0.0135 pounds per ton of steel processed.

(2) HAP Limitations:

The single HAP usage at the steel pickling process shall be limited to less than 9.986 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is accomplished by limiting the HCl at 2.28 lb/hr. This usage limit, including the potential to emit of HAP limits single HAP to less than 10.0 tons per year.

Compliance with above conditions shall limit the source-wide PM2.5 and PM10 emissions to less than 100 tons per twelve consecutive month period; any individual HAP to less than ten (10) tons per twelve (12) consecutive month period, and combination HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month, respectively. These limits will render 326 IAC 2-7 (Part 70), 326 IAC 2-2 and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable.

326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)

This source is located in St. Joseph County. However, the steel pickling line at this source is not specifically listed in 326 IAC 6.5-7. The potential to emit PM of this source is greater than 100 tons per year and actual emissions are more than 10 tons per year of particulate matter. Therefore, the emission units at this source must comply with the more stringent requirements of

326 IAC 6.5 or 326 IAC 6-3-2. Therefore, the PM emissions from the steel pickling line are subject to the requirements of 326 IAC 6.5-1-2. Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) from the steel pickling line shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

NOTE: Based on 326 IAC 2-8-4 limits, Particulate emissions from the pickling operation are less than 0.03 grain per dry standard cubic foot, therefore complies with 326 IAC 6.5-1-2.

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

Pursuant to 326 IAC 6-3-1(c)(3), the steel pickling line is exempt from the requirements of 326 IAC 6-3-2 because the steel pickling line is subject to the more stringent requirements of 326 IAC 6.5-1.

Leveler, Brazing, Cutting Soldering, Welding, Boilers, and Emergency Generator

326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)

This source is located in St. Joseph County and the actual PM emissions from the source are greater than 10 tons per year. Therefore, the PM emissions from this source are subject to the requirements of 326 IAC 6.5-1-2 and shall comply with the following:

(a) Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) from each of the leveler plates, brazing, cutting torches, soldering, and welding operations shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

(b) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter (PM) from each of the natural gas fired boilers shall not exceed 0.01 grain per dry standard cubic foot (gr/dscf).

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

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. Since PM emissions from the leveler plates, brazing, cutting, soldering, and welding are subject to the requirements of 326 IAC 6.5-1, these emission units are exempt from the requirements of 326 IAC 6-3-2.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired boilers are subject to emission limitations under 326 IAC 6.5. Pursuant to 326 IAC 6-2-1(e), the limits in 326 IAC 6.5 prevail over the limits established in 326 IAC 6-2.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Pursuant to 326 IAC 8-1-6, this source is not subject to this rule because none of the emission units at this source have the potential to emit twenty-five (25) tons per year or more of VOC.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.6, the boilers are not subject to this rule because the potential sulfur dioxide emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour.

326 IAC 10-5 (Nitrogen Oxide Reduction Program for Internal Combustion Engines (ICE))

Pursuant to 326 IAC 10-5, the emergency generator is not subject to the requirements because it is not a large NOx SIP Call engine.

Degreasing Operations

326 IAC 8-3-2 (Cold Cleaner Operation)

Any degreaser using VOC containing solvents is considered a cold cleaning operation.
The degreasing operation was constructed after January 1, 1980 in St. Joseph County and is used to perform organic solvent degreasing operations. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The degreasing operation is subject to 326 IAC 8-3-5 because it was constructed in St. Joseph County prior to July 1, 1990, is used to perform organic solvent degreasing operations, and does not have a remote solvent reservoir.

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, the Permittee shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without a remote solvent reservoir existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

This source is not subject to the requirements of the 326 IAC 20-6-1, since the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

Compliance Determination and Monitoring Requirements

(a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control device - Stack	Operating Parameters	Frequency	Range	Excursions and Exceedances
Steel Pickling Line/ Scrubber-stack (S-2)	Water Pressure Drop	Daily	4.9 to 6.7 inches of water (CE1-Lower Part of scrubber)	Response Steps
			0.4 to 1.3 inches of water (CE2 -Upper Part of scrubber)	
	Visible Emissions		Normal-Abnormal	
	Scrubbing liquid	Daily	262 gallon/minute	Response Steps
	Make up water flow rate		17 gallons/minute	

These monitoring conditions are necessary because the scrubber for the steel pickling operation must operate properly to ensure compliance with 326 IAC 6.5 (Particulate Matter Emission Limitations) and 326 IAC 2-8 (FESOP). The two stage scrubber followed by a demister shall operate all the times the steel pickling operation is in operation.

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

Emission Unit	Control Device	Time frame for Testing	Pollutant	Frequency of Testing	Limit or Requirement
Steel Pickling Line	Scrubber Stack S-2	Within five (5) years of the last valid compliant stack test. Within 180 days after publication of revised test method or within five (5) years of the last valid compliant stack test, which ever is later.	PM, and HCl PM10, and PM 2.5	Once every five (5) years Once every five (5) years	PM = 0.0135 lbs/ ton metal HCl = 2.28 lbs/hr $PM_{10,}$ $PM_{2.5}$ each =0.0135 lbs/ton metal

The last Scrubber stack test occurred in November 2005 for PM, PM_{10} and HCl. *The source was in compliance at that time. The next scheduled PM/PM10 test will be in 2010. However, due to the new federal rule regarding the PM2.5, the test shall be performed per schedule above. The source has taken FESOP limits to comly with 326 IAC 2-8 and 326 IAC 6.5 (Particulate Matter Limitations Except Lake County).*

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant on February 11, 2009, February 12, 2009, March 16, 2009 and April 21, 2009. An application for the purposes of this review was received on January 27, 2009.

The operation of this source shall be subject to the conditions of the attached proposed FESOP No.: 141-27412-00155. The staff recommends to the Commissioner that this FESOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Swarna Prabha at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5376 or toll free at 1-800-451-6027 extension 4-5376.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emission Calculations
PM/PM10 and HAP Emissions
Emission Summary

Company Name: **Steel Warehouse Company, LLC**
Address City IN Zip: **2722 West Tucker Dr., South Bend, IN 46624**
FESOP Permit No: **141-27412-00155**
Reviewer: **Swarna Prabha**

Process before control	PM	PM10	SO2	NOx	VOC	CO	Singe HAP	
Steel Pickling line	100.52	100.52	0.00	0.00	0.00	0.00	99.86	HCl (single HAP)
Natural gas Combustion	0.11	0.45	0.04	5.87	0.32	4.93	0.11	Hexane
Emergency Generator	0.87	0.87	0.81	12.35	1.01	2.66	negl.	
Leveler Plate Line	0.54	0.54	0.00	0.00	0.00	0.00	0.00	Based on permit No.: M141-14639-00155
Diesel Storage Tank	0.00	0.00	0.00	0.00	1.00	0.00	0.00	Based on permit No.: M141-14639-00155
Other Insignificant Activities*	14.00	14.00	0.03	5.87	0.32	4.93	0.00	Based on permit No.: M141-14639-00155
Fugitive Emissions	2.00	2.00	0.00	0.00	0.00	0.00	0.00	Based on permit No.: M141-14639-00155
Total (tons/yr)	**118.04**	**118.38**	**0.88**	**24.09**	**2.65**	**12.52**	**99.86 (HCl)**	

Note: All values are in Tons per year

Process after control	PM	PM10	SO2	NOx	VOC	CO	Single HAP	
Steel Pickling line	10.05	10.05	0.00	0.00	0.00	0.00	9.986	HCl (single HAP)
Natural gas Combustion	0.11	0.45	0.04	5.87	0.32	4.93	0.11	Hexane
Emergency Generator	0.87	0.87	0.81	12.35	1.01	2.66	negl.	
Leveler Plate Line	0.005	0.005	0.00	0.00	0.00	0.00	0.00	Based on permit No.: M141-14639-00155
Diesel Storage Tank	0.00	0.00	0.00	0.00	1.00	0.00	0.00	Based on permit No.: M141-14639-00155
Other Insignificant Activities*	14.00	14.00	0.03	5.87	0.32	4.93	0.00	Based on permit No.: M141-14639-00155
Fugitive Emissions	2.00	2.00	0.00	0.00	0.00	0.00	0.00	Based on permit No.: M141-14639-00155
Total (tons/yr)	**27.04**	**27.37**	**0.88**	**24.09**	**2.65**	**12.52**	**9.986 (HCl)**	

There are no emissions for PM2.5 in AP42, therefore PM2.5 = PM10

1. Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

*Other insignificant units include storage vessels, application of oils or lubricants, welding, degreasing, trimmers, material collection equipment, various blowdown oprerations, and a small annealing operation. As a worst-case scenario, it is assumed that these units will emit no more than the total amounts shown for Other Insignificant Units above.

Appendix A: Emission Calculations
PM/PM10 and HAP Emissions
Steel Pickling Line

Company Name: Steel Warehouse Company, LLC
Address City IN Zip: 2722 West Tucker Dr., South Bend, IN 46624
FESOP Permit No 141-27412-00155
Reviewer: Swarna Prabha

Max. Capacity (tons/hr)	
170	Stack flow rate = 9037 acfm

This line is controlled by two (2) packed bed scrubber followed by a demister pad.

Emission Limit*	PM 0.0135 (lbs/ton)	PM10/PM2.5 0.0135 (lbs/ton)	HCl 2.28 (lbs/hr)
**Scrubber control efficiency %	**90**	**90**	**90**
Potential to Emit after Control in tons/yr	**10.05**	**10.05**	**9.986**
Potential to Emit before Control in tons/yr	100.52	100.52	99.864

*These emission limits are to comply with 326 IAC 6.5-1-2 requirements and to comply with 326 IAC 2-8-4
**The control efficiency of the scrubber is 90.0% based on source data.
Last Stack test was conducted in November 2005.

Methodology:

PTE of PM/PM10 after Control (tons/yr) = Max. Capacity (tons/hr) x Emission Limit (lbs/ton) x 8760 hr/yr x 1 ton/2000 lbs
PTE of HCl after Control (tons/yr) = Emission Factor (lbs/hr) x 8760 hr/yr x 1 ton/2000 lbs

Emissions based on outlet grain loading 326 IAC 6.5

Controlled PM/ PM10 Emissions = 0.03 gr/dscf x 9037 acfm x 60 min/hour x 1 lb/7000 grains x 8760 hours/ year x 1 ton/2000 lbs = 10.17 tons /yr

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boilers (5MMBtu/hr and 10.5MMBtu/hr)

Company Name: **Steel Warehouse Company, LLC**
Address City IN Zip: **2722 West Tucker Dr., South Bend, IN 46624**
FESOP Permit No.: **141-27412-00155**
Reviewer: **Swarna Prabha**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
13.40	117.38

Boiler 1 = 5 MMBTU/HR
Boiler (SB03) = 8.4 MMBTU/HR

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 *see below	5.5	84.0
Potential Emission in tons/yr	0.11	0.45	0.04	5.87	0.32	4.93
Potential Emission in lb/hr	0.025	0.102	0.008	1.340	0.074	1.126

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	1.23E-04	7.04E-05	4.40E-03	1.06E-01	2.00E-04
Potential Emission in lb/hr	2.81E-05	1.61E-05	1.01E-03	2.41E-02	4.56E-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	2.93E-05	6.46E-05	8.22E-05	2.23E-05	1.23E-04
Potential Emission in lb/hr	6.70E-06	1.47E-05	1.88E-05	5.09E-06	2.81E-05

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
There is no emission factor for PM2.5 in AP 42, PM10 = PM2.5
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
All emission factors are based on normal firing.
1BHP = 45 *10^3 Btu/hr based on EPA's boiler horsepower conversion specifications.
http://www.epa.gov/ttn/chief/ap42/appendix/appa.pdf
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
PM emission factors are condensable and filterable.

Methodology:
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

Appendix A: Emission Calculations
Emergency Generator
HAPs Emissions

Company Name: Steel Warehouse Company, LLC
Address: 2722 West Tucker Dr., South Bend, IN 46619
FESOP Permit No.: 141-27412-00155
Reviewer: Swarna Prabha

Maximum Output (hp-hr)	Maximum Output MMBtu
1600	11.20

	Pollutant					
	PM*	PM10*	SO_2	NOx	VOC**	CO
Emission Factor (lbs/MMBtu)	3.10E-01	3.10E-01	2.90E-01	4.410	0.360	9.50E-01
Potential to Emit (tons/year)	0.87	0.87	0.81	12.3	1.01	2.66

HAPs - Organics

	Benzene	Xylenes	Formaldehyde	Propylens	Toluene
Emission Factor in lb/MMcf	9.3E-04	2.9E-04	1.2E-03	2.6E-03	4.1E-04
Potential Emission in tons/yr	2.61E-03	7.98E-04	3.30E-03	7.22E-03	1.15E-03
Potential Emission in lb/hr	5.96E-04	1.82E-04	7.54E-04	1.65E-03	2.61E-04

7,000 Btu/hp-hr was used to convert from lb/MMBtu to lb/hp-hr

Methodology
PTE (tons/year) at 500 hrs = Maximum Output (hp) x Emission Factor (lbs/hp-hr) x 500 hrs/yr x 1 ton/2,000 lbs

The five highest organic HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 3.3.
(2-03-001-01)

Appendix A: Emissions Calculations
Leveler Plate Line

Company Name: Steel Warehouse Company, LLC
Address: 2722 West Tucker Dr., South Bend, IN 46619
MSOP: 141-27412-00155
Reviewer: Swarna Prabha

The leveler plate line is controlled by a baghouse.

*Potential to Emit PM/PM10 (tons/yr) = Amount of Material Collected in Baghouse (lbs/hr) x (1/Control Efficiency of Baghouse %) x 8,760 hrs/yr x 1 ton/2,000 lbs

= 0.121 lbs/hr x (1/99.0%) x 8,760 hrs/yr x 1 ton/2,000 lbs
= 0.54 tons/yr

PM/PM10 Emissions After Control (tons/yr) = 0.121 lbs/hr x((1/ Control Efficiency of Baghouse %)-1) x 8,760 hrs/yr x 1 ton/2,000 lbs

= .121 lbs.hr x ((1/.99) - 1)) x 8,760 hrs/yr x 1 ton/2,000 lbs

= **0.005 tons per year**

* Emissions for this operation are based on Permit # 141-14639-00155

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Tony Truscelli
Steel Warehouse Company, LLC
2722 W Tucker Drive
South Bend, IN 46619

DATE: June 16, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
FESOP
141-27412-00155

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Gerald Lerman (VP/Legal Counsel)
Valerian Simianu (M3V, LLC)
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

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Toll Free (800) 451-6027
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June 16, 2009

TO: St. Joseph County Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: **Steel Warehouse Company, LLC**
Permit Number: **141-27412-00155**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	MIDENNEY 6/16/2009 Steel Warehouse Company, LLC 141-27412-00155 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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1		Tony Truscelli Steel Warehouse Company, LLC 2722 W Tucker Dr South Bend IN 46619 (Source CAATS) via confirmed delivery									
2		Gerald Lerman VP/ Legal Counsel Steel Warehouse Company, LLC 2722 W Tucker Dr South Bend IN 46619 *(RO CAATS)*									
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 *(Affected Party)*									
4		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 *(Affected Party)*									
5		St Joseph Co Public Library 304 S Main South Bend IN 46601-2125 *(Library)*									
6		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 *(Affected Party)*									
7		South Bend City Council / Mayors Office 227 W. Jefferson Blvd. South Bend IN 46601 *(Local Official)*									
8		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 *(Local Official)*									
9		St. Joseph County Health Department 227 W Jefferson Blvd, Room 825 South Bend IN 46601-1870 *(Health Department)*									
10		Ms. Valerian Simianu M3V, LLC 11925 E 65th St, Ste 13 Indianapolis IN 46236 *(Consultant)*									
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