



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: February 11, 2011

RE: Steel Dynamics, Inc. – Flat Roll Division / 033-28510-00043

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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

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

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

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

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



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Mr. Barry Smith
Steel Dynamics, Inc.
4500 County Road 59
Butler, IN 46721

February 11, 2011

Re: 033-28510-00043
Significant Permit Modification to
Part 70 No.: T 033-8068-00043

Dear Mr. Smith:

Steel Dynamics, Inc. - Iron Dynamics Division was issued a Part 70 Operating Permit T 033-8068-00043 on October 4, 2006 for a stationary Direct Reduced Iron (DRI) manufacturing operation at a steel minimill. A letter requesting changes to this permit was received on September 28, 2009. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification involves the modification of several conditions resulting from discussions between the Permittee and IDEM.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire Part 70 Operating Permit as modified.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Kristen Willoughby, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or call at (800) 451-6027, and ask for Kristen Willoughby or extension 3-3031, or dial (317) 233-3031.

Sincerely,

Donald F. Robin, P.E., Section Chief
Permits Branch
Office of Air Quality

Attachments

KLW

cc: File - Dekalb County
U.S. EPA, Region V
Dekalb County Health Department
Northern Regional Office
Air Compliance and Enforcement Branch



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Steel Dynamics, Inc. - Flat Roll Division
4500 County Road 59
Butler, Indiana 46721

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T033-8068-00043

Issued by:/Original signed by:

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Issuance Date: October 4, 2006

Expiration Date: October 4, 2011

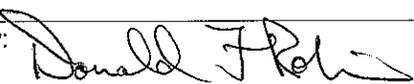
1st Significant Permit Modification No. 033-24411-00043, issued December 19, 2007

2nd Significant Permit Modification No. 033-27843-00043, issued July 10, 2009

3rd Significant Permit Modification No. 033-28134-00043, issued December 30, 2009

4th Significant Permit Modification No.: 033-28510-00043

Issued by:


Donald F. Robin, P.E., Section Chief
Permits Branch
Office of Air Quality

Issuance Date: February 11, 2011

Expiration Date: October 4, 2011

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SDI Certification

SDI Emergency Occurrence Report Form

SDI Quarterly Deviation and Compliance Monitoring Report Form

SDI Quarterly Report Form

Fugitive Dust Control Plan

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 - General Information, A.2 - Part 70 Source Definition, A.3 - Emission Units and Pollution Control Equipment Summary and A.4 - Insignificant Activities is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary steel minimill.

Source Address: 4500 County Rd 59, Butler, Indiana 46721
Phone Number: 260-868-8000
SIC Code: 3312
County Location: DeKalb
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules
1 of 28 Source Categories
Minor Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

The source consists of:

- (a) Steel Dynamics, Inc. - Flat Roll Division (SDI-Flat Roll), located at 4500 County Road 59, Butler, Indiana 46721; and
- (b) Steel Dynamics, Inc. - Iron Dynamics Division (SDI-IDD), located at 4500 County Road 59, Butler, Indiana 46721.

Separate Part 70 permits will be issued to Steel Dynamics, Inc. - Flat Roll Division (033-8068-00043) and Steel Dynamics, Inc. - Iron Dynamics Division (033-12614-00076), solely for administrative purposes. For this permit, the Permittee is Steel Dynamics, Inc. - Flat Roll Division, the primary operation.

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

Steel Dynamics, Inc. - Flat Roll Division consists of the following emission units and pollution control devices:

Melt Shop Operations

- (a) Electric Arc Furnaces (EAF)

Two (2) twin shell electric arc furnaces (EAF #1 South, permitted in 1994 for construction and EAF #2 North, permitted in 1997 for construction), each with a nominal capacity of 200 tons per hour, using a direct shell evacuation (DSE) system ("fourth hole" duct), an overhead roof exhaust system consisting of canopy hoods, DSE air gap for carbon monoxide (CO) emissions control, and low-NO_x/oxyfuel burners (combustion control) for nitrogen oxide (NO_x) emissions control. Particulate emissions from EAF #2 North are controlled by EAF Baghouse 2. All emissions from EAF #2 North exhaust to Stack 92. Particulate emissions from EAF #1 South are controlled by EAF Baghouse 1. All emissions from EAF #1 South exhaust to Stack 01.

(b) Continuous Casters

Two (2) continuous casters (CC #1 South, permitted in 1994 for construction and CC #2 North, permitted in 1997 for construction), each with a nominal capacity of 225 tons per hour. Particulate matter (PM/PM10) emissions are controlled by canopy hoods over each caster exhausting to the EAF baghouse through Stack 01.

(c) Miscellaneous natural gas combustion sources

- (1) One (1) ladle dryout station (LDS), with a nominal heat input of 10 MMBtu per hour, permitted in 1994 for construction;
- (2) Four (4) ladles preheat stations (LPS), with a nominal heat input of 10 MMBtu per hour each, three (3) permitted in 1994 and one (1) permitted in 1995 for construction;
- (3) Three (3) natural gas fired tundish ladle dryers with a nominal heat input capacity of 1.5 MMBtu per hour each, one (1) permitted in 1994 and two (2) permitted in 1995 for construction;
- (4) Two (2) natural gas-fired tundish preheaters with a nominal heat input capacity of 9.4 MMBtu per hour each, permitted in 1994 for construction; and
- (5) Lancing and cutting of skulls, coils and steel scrap.

(d) Storage Silos and Bins

- (1) Eleven (11) storage silos including the following:
 - (A) Three (3) EAF dust silos consisting of:
 - (i) Bin vent 5a for particulate matter control permitted in 1994 for construction,
 - (ii) Bin vent 5b for particulate matter control permitted in 1997 for construction and
 - (iii) Bin vent 5c for particulate matter control, permitted in 2007 for construction.
 - (B) Six (6) Lime/carbon silos with bin vents 22 through 27 for particulate matter control, permitted in 1994 and 1997 for construction, and
 - (C) Two (2) alloy silos with bin vents 28 and 29 for particulate matter control, permitted in 1994 for construction.
- (2) Enclosed, indoor and/or pneumatic conveying to control fugitive emissions.

(e) Slag pit digouts associated with each electric arc furnace.

(f) Melt shop building openings, dust handling system and melt shop roof monitors.

Ladle Metallurgical Stations

Two (2) Ladle Metallurgical Stations (LMS) (South permitted in 1994 for construction and North permitted in 1998 for construction), each with a nominal capacity of 200 tons per hour. Particulate (PM/PM10) emissions are controlled by the Ladle Metallurgical Furnaces (LMF) baghouse (permitted in 1998 for construction, with a nominal air flow rate of 200,000 standard cubic feet per minute) exhausting through Stack 61. The LMS consists of the following:

- (a) Three (3) Ladle Metallurgical furnaces (LMF), and
- (b) Two (2) stir stations.

Hot Mill Operations - Tunnel Furnaces

- (a) One (1) tunnel furnace, No. 1 South, permitted in 1994 for construction, using low NOx burners, with a nominal heat input capacity of 117.9 MMBtu per hour (nominal 92 MMBtu per hour in the heating zone and nominal 25.9 MMBtu per hour in the holding zone), exhausting through Stack 2.
- (b) One (1) tunnel furnace, No. 2 North, permitted in 1997 for construction, using low NOx burners with a nominal heat input capacity of 92 MMBtu per hour in the heating zone, exhausting through Stack 42.

Cold Mill Operations – Pickling Line

One (1) pickling line, with a nominal capacity of 1.4 million ton per year, permitted in 1996 for construction, with a packed scrubber and covered tanks maintained under negative pressure, for Hydrochloric Acid (HCl) control, and a mist eliminator for PM/PM-10 control, exhausting to Stack 17.

Pickle Line Scale Breaker

One (1) scale breaker, permitted in 1996 for construction, with a nominal capacity of 1.4 million tons per year that removes scale from the rolled steel prior to the pickling process. Particulate (PM/PM10) emissions are controlled by a baghouse with a nominal air flow rate of 10,600 acfm and exhausting to Stack 60.

Pickle Line Boilers

Three (3) natural gas fired boilers Nos. 1, 2 and 3, two (2) permitted in 1996 for construction and one (1) permitted in 2006, equipped with low NOx burners, exhausting to Stacks 15, 16a and 16b. The nominal heat input for each boiler is 20.4 MMBtu per hour. Only two (2) boilers will be utilized at any given time.

Reversing Mill

One (1) cold reversing mill, with a nominal capacity of one (1.0) million tons per year, permitted in 1996 for construction, with a mist eliminator for particulate (PM/PM10) emissions control, exhausting to Stack 18.

Galvanizing Lines

- (a) One (1) hot band galvanizing line with a nominal capacity of 400,000 tons of steel per year, permitted in 1996 for construction, heated by a low NOx burner natural gas fired heater with a nominal heat input of 45 MMBtu per hour, exhausting through Stack 19.
- (b) Twenty-four (24), natural gas fired radiant tube heaters associated with the galvanizing line, permitted in 2002 for construction. Each heater has a nominal heat input of 0.3 MMBtu per hour, exhausting inside the building.
- (c) One (1) cold rolled galvanizing line with a nominal capacity of 300,000 tons of steel per year, permitted in 1996 for construction, heated by a low NOx burner natural gas fired heater with a nominal heat input of 55 MMBtu per hour, exhausting to Stack 19.

Annealing Furnaces

Sixteen (16) low NOx burners, natural gas fired annealing furnaces and forty (40) annealing bases, permitted in 1996 for construction. Each furnace has a nominal heat input of four (4) MMBtu per hour, exhausting through roof pipes 30, 31 and 32.

Paint Line (Coil Coating Line)

- (a) One (1) 2-side, 2-coat coil coating line, permitted in 2002 for construction, using roll coating method, with a nominal capacity of 55,000 pounds per hour of the flat rolled steel, using a 60 MMBtu per hour heat input capacity burner equipped thermal oxidizer to control VOC emissions and exhausting to Stack 78.
- (b) Two (2) curing ovens, permitted in 2002 for construction, with a combined nominal heat input capacity of 16 MMBtu per hour using a 60 MMBtu per hour nominal heat input capacity burner equipped thermal oxidizer to control VOC emissions and exhausting to Stack 78.

Slag Handling Operation

The following slag handling operations are owned and operated by Edward C. Levy Company - Butler Mill Service.

- (a) One (1) grizzly feeder with a nominal capacity of 300 tons per hour, permitted in 1994 for construction;
- (b) One (1) 36" conveyor (#9), with a nominal capacity of 350 tons per hour, permitted in 1994 for construction;
- (c) One (1) 30" conveyor (#7), with a nominal capacity of 350 tons per hour, permitted in 1994 for construction;
- (d) Two (2) 5' by 12' Screens, each with a nominal capacity of 350 tons per hour, permitted in 1994 for construction;
- (e) One (1) 24" conveyor (#6), with a nominal capacity of 100 tons per hour, permitted in 1994 for construction;
- (f) One (1) 30" conveyor (#5), with a nominal capacity of 250 tons per hour, permitted in 1994 for construction;
- (g) Three (3) 6' by 16' Screens, each with a nominal capacity of 250 tons per hour, permitted in 1994 for construction;
- (h) One (1) 48" Conveyor (#1), with a nominal capacity of 75 tons per hour, permitted in 1994 for construction;
- (i) One (1) 24" Stacker (#1), with a nominal capacity of 75 tons per hour, permitted in 1994 for construction;
- (j) One (1) 24" Stacker (#2), with a nominal capacity of 125 tons per hour, permitted in 1994 for construction;
- (k) One (1) 24" Conveyor (#12); with a nominal capacity of 40 tons per hour, permitted in 1994 for construction;
- (l) One (1) 24" Stacker (#4), with a nominal capacity of 50 tons per hour, permitted in 1994 for construction;

- (m) One (1) 4 ¼ Standard Crusher, with a nominal capacity of 50 tons per hour, permitted in 1994 for construction;
- (n) One (1) 30" Conveyor (#8), with a nominal capacity of 25 tons per hour; permitted in 1994 for construction;
- (o) Two (2) 30" Conveyors (#10 and #11), with a nominal capacity of 50 tons per hour each, permitted in 2003 for construction;
- (p) One (1) jaw crusher, with a nominal capacity of 100 tons per hour, permitted in 2003 for construction, and
- (q) Aggregate Storage Piles.

Fugitive emissions from parts of the slag handling operations are controlled as needed by water sprays.

Fugitive Dust Sources

- (a) Paved roads,
- (b) Parking areas,
- (c) Unpaved roads, and
- (d) Traveled open areas.

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

Steel Dynamics, Inc. - Flat Roll Division also includes the following insignificant activities:

1. Specifically regulated insignificant activities, which are specifically regulated as defined in 326 IAC 2-7-1(21): One (1) Temper Mill [326 IAC 6-3-2]
2. Other Insignificant Activities
 - (a) Space heaters, process heaters, or boilers using the following fuels:
 - (i) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (ii) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
 - (b) Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) British thermal units per hour except where total capacity of equipment operated by one (1) stationary source as defined by subdivision (38) exceeds two million (2,000,000) British thermal units per hour.
 - (c) Combustion source flame safety purging on startup.
 - (d) Fuel dispensing activities, including the following:
 - (i) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.
 - (ii) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
 - (e) The following VOC and HAP storage containers:

- (i) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.
- (ii) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Refractory storage not requiring air pollution control equipment.
- (g) Equipment used exclusively for filling drums, pails, or other packaging containers with the following: Lubricating oils, Waxes and Greases.
- (h) Application of: oils; greases; lubricants; and nonvolatile material; as temporary protective coatings.
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (j) Closed loop heating and cooling systems.
- (k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (l) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPS.
- (m) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner or Operator, that is, an on-site sewage treatment facility.
- (n) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPS.
- (o) Noncontact cooling tower systems with the following: Forced and induced draft cooling tower system not regulated under a NESHAP.
- (p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (q) Heat exchanger cleaning and repair.
- (r) Process vessel degassing and cleaning to prepare for internal repairs.
- (s) Covered conveyors for solid raw material, including the following:
 - (i) Coal or coke conveying of less than or equal to three hundred sixty (360) tons per day.
 - (ii) Limestone conveying of less than or equal to seven thousand two hundred (7,200) tons per day for sources other than mineral processing plants constructed after August 31, 1983.
- (t) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (v) Blow down for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (w) Activities associated with emergencies, including the following:
 - (i) On-site fire training approved by the department.
 - (ii) Emergency generators as follows: Gasoline generators not exceeding one hundred ten (110) horsepower and Diesel generators not exceeding one thousand six hundred (1,600) horsepower.
 - (iii) Stationary fire pump engines.
- (x) A laboratory as defined in 326 IAC 2-7-1(21)(D)
- (y) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (z) Cleaners and solvents characterized as follows: Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F).
- (aa) Brazing equipment, cutting torches, soldering equipment, and welding equipment related to manufacturing activities not resulting in emissions of HAPS.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONDITIONS

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

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

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

-
- (a) This permit, T033-8068-00043, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7][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, and the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

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

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

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

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

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

-
- (a) The Permittee shall furnish to IDEM, OAQ, 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. 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 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

-
- (a) A certification required by this permit meets the requirement of 326 IAC 2-7-6(1) if:

- (i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
 - (ii) the certification states that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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 July 1 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

and

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

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

The submittal by the Permittee does require a certification that meet the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (a) A Preventive Maintenance Plan (PMP) meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) 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. The PMP and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

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

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

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

Indiana Department of Environmental Management
Compliance 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 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b) (2) (Sections 502(b) (10) of the Clean Air Act changes) and 326 IAC 2-7-20(c) (2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c) (7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b) (8)]

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

Except for the construction authorizations in these permits, all terms and conditions applicable to this source contained in the following permits:

Permit Number	Issuance Date
033-3692-00043	October 7, 1994
033-4997-00043	November 16, 1995
033-5625-00043	August 8, 1996
033-8091-00043	June 25, 1997
033-9187-00043	March 24, 1998
033-9752-00043	August 18, 1998
033-9506-00043	September 1, 1998
033-15186-00043	February 11, 2002
033-15836-00043	December 31, 2002
033-16638-00043	January 21, 2003
033-16981-00043	January 21, 2003
033-23028-00043	October 26, 2007
033-24411-00043	December 19, 2007
033-27843-00043	July 10, 2009
033-28134-00043	December 30, 2009

issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. Except for the construction authorizations of these permits, these prior permits and all of their terms and conditions are hereby superseded.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6) (C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6) (C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a) (3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ 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 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7 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, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

Indiana Department of Environmental Management
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 does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.18 Permit Revision under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b) (2)]

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

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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

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

Indiana Department of Environmental Management
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 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

Indiana Department of Environmental Management
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 does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c) (3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. In the event that the source is a sub-contractor and is combined with a larger Part 70 source, the larger Part 70 source may pay the Permittees' annual fees as part of the larger source billing and subject to the fee cap of the larger source. If, however, the larger Part 70 does not pay its annual Part permit fee, IDEM, OAQ will assess a separate fee in accordance with 326 IAC 2-7-19(c) to be paid by the Permittee. 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) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Matter 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 manufacturing 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 Opacity [326 IAC 5-1]

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.6 Stack Height [326 IAC 1-7]

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

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

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

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

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

- (a) For performance testing required by this permit, 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 61-52 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, no 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 no 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale

such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

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

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

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

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

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

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

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

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

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation of this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

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

- (a) When the results of a Stack test performed in conformance with Section C.8 - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred eighty (180) 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 not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6][326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11][326 IAC 2-2]

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

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit no later than July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii) and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (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 except that 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. This report shall be submitted no later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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) 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.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C.17 - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) at an existing emissions unit and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq)), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

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

Stratospheric Ozone Protection

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

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

Alternative Operating Scenario

C.20 Alternative Operating Scenario

The Permittee may use propane gas as an alternative fuel for natural gas during emergency situations.

SECTION D.1 FACILITY OPERATION CONDITIONS (MELT SHOP)

Facility Description [326 IAC 2-7-5(15)]:

Melt Shop Operations

(a) Electric Arc Furnaces (EAF)

Two (2) twin shell electric arc furnaces (EAF #1 South, permitted in 1994 for construction and EAF #2 North, permitted in 1997 for construction for construction), each with a nominal capacity of 200 tons per hour, using a direct shell evacuation (DSE) system ("fourth hole" duct), an overhead roof exhaust system consisting of a canopy hoods, DSE air gap for carbon monoxide (CO) emissions control, and low-NO_x/oxyfuel burners (combustion control) for nitrogen oxide (NO_x) emissions control. Particulate emissions from EAF #2 North are controlled by EAF Baghouse 2. All emissions from EAF #2 North exhaust to Stack 92. Particulate emissions from EAF #1 South are controlled by EAF Baghouse 1. All emissions from EAF #1 South exhaust to Stack 01.

(b) Continuous Casters

Two (2) continuous casters (CC #1 South, permitted in 1994 for construction and CC #2 North, permitted in 1997 for construction), each with a nominal capacity of 225 tons per hour. Particulate (PM/PM10) emissions are controlled by canopy hoods over each caster exhausting to the EAF baghouse through Stack 01.

(c) Miscellaneous natural gas combustion sources

- (1) One (1) ladle dryout station (LDS), with a nominal heat input of 10 MMBtu per hour, permitted in 1994 for construction;
- (2) Four (4) ladle preheat stations (LPS), with a nominal heat input of 10 MMBtu per hour each, three (3) permitted in 1994 for construction and one (1) permitted in 1995 for construction;
- (3) Three (3) natural gas-fired tundish dryers with nominal heat input capacity of 1.5 MMBtu per hour each one (1) permitted in 1994 and two (2) permitted in 1995 for construction;
- (4) Two (2) natural gas-fired tundish ladle preheaters with a nominal heat input capacity of 9.4 MMBtu per hour each, permitted in 1994 for construction; and
- (5) Lancing and cutting of skulls, coils and steel scrap.

(d) Storage Silos and Bins

- (1) Eleven (11) outside storage silos including the following:
 - (A) Three (3) EAF dust silos, consisting of:
 - (i) Bin vent 5a for particulate matter control, permitted in 1994 for construction,
 - (ii) Bin vent 5b for particulate matter control, permitted in 1997 for construction;
 - (iii) Bin vent 5c for particulate matter control, permitted in 2007 for construction.
 - (B) Six (6) Lime/carbon silos with bin vents 22 through 27 for particulate matter control, permitted in 1994 and 1997 for construction, and
 - (C) Two (2) alloy silos with bin vents 28 and 29 for particulate matter control, permitted in 1994 for construction.
- (2) Enclosed, indoor and/or pneumatic conveying to control fugitive emissions.

(e) Slag pit dig outs associated with each electric arc furnace.

(f) Melt Shop building openings, dust handling system and Melt Shop roof monitors

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

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

D.1.1 Particulate Matter (PM) Limitations [40 CFR Part 60, Subpart AAa]

Pursuant to 40 CFR 60, Subpart AAa (Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarbonization Vessels Constructed After August 17, 1983),

filterable particulate matter emissions from the EAF baghouses, due solely to EAF operations, shall not exceed 0.0052 grains per dry standard cubic feet.

D.1.2 Particulate (PM/PM-10) Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to PSD CP 033-8091-00043, issued June 25, 1997, PSD SSM 033-23028-00043 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements):
- (1) The PM/PM10 emissions from EAF #1 South shall be controlled by a direct shell evacuation (DSE) system and canopy hood with 100 percent overall capture exhausted to EAF Baghouse 1 with a minimum 99.85 control efficiency for filterable PM/PM10, discharging through Stack 01. A negative pressure shall be maintained to draw particulate matter through the DSE duct. Baghouse 1 shall be operated at all times when the EAF #1 South is in operation.
 - (2) The PM/PM10 emissions from EAF #2 North shall be controlled by a direct shell evacuation (DSE) system and canopy hood with 100 percent overall capture and shall exhaust to EAF Baghouse 2 with a minimum 99.85 control efficiency for filterable PM/PM10, which discharges through Stack 92. A negative pressure shall be maintained to draw particulate matter through the DSE duct. Baghouse 2 shall be operated at all times when the EAF #2 North is in operation.
 - (3) The PM/PM10 emissions from EAF #2 North and EAF #1 South shall not exceed the limits in the following table:

Unit (Control)	Filterable PM/PM10 Limits		Filterable and Condensable PM10 Limits	
	(gr/dscf)	(lb/hr)	(gr/dscf)	(lb/hr)
EAF #1 South (EAF Baghouse 1)	0.0018	20.1	0.0052	57.9
EAF #2 North (EAF Baghouse 2)	0.0018	15.3	0.0052	44.3

- (b) Pursuant to CP 033-9187-00043, March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), PM/PM10 emissions from the continuous casters shall be controlled by canopy hoods and exhausted to EAF baghouse 1 and then to Stack 01. Baghouse 1 shall be operated at all times when the continuous casters are in operation.
- (c) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD Control Technology Review Requirements), the Permittee shall do the following as needed:
 - (1) Mechanically reduce skulls, coils and steel scrap in size.
 - (2) Oxygen lancing/cutting of any skulls, coils and steel scrap not mechanically reduced in size shall be conducted inside a building with adequate capture of emissions by a control system and a baghouse to control emissions.
- (d) Pursuant to PSD SSM 033-23028-00076 and 326 IAC 2-2-3 (BACT), the filterable PM/PM10 emissions from EAF dust silo 5c shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf).

D.1.3 Nitrogen Oxides (NO_x) Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the NO_x emissions from the EAFs using low-NO_x natural gas fired burners shall not exceed 0.51 pounds per ton of steel produced. The total NO_x emissions shall not exceed 204.0 pounds per hour.

- (b) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the Ladle Dryout Station (LDS) shall be limited to the use of natural gas, shall not exceed 10 MMBtu per hour heat input and NOx emissions shall not exceed 0.10 lbs/MMBtu.
- (c) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the four (4) Ladle Preheat Stations (LPS) shall be limited solely to the use of low-NOx natural gas-fired burners. The four (4) horizontal preheater stations combined shall not exceed 40 MMBtu per hour heat input and the NOx emissions shall not exceed 0.14 lbs/MMBtu.
- (d) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the three (3) Tundish dryers shall use low-NOx burners. Each burner shall be limited to 1.5 MMBtu per hour heat input and the NOx emissions shall not exceed 0.10 lbs/MMBtu.
- (e) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the two (2) Tundish Preheaters shall use low-NOx burners. Each burner shall not exceed 9.4 MMBtu per hour heat input and the NOx emissions shall not exceed 0.10 lbs/MMBtu.

D.1.4 Sulfur Dioxide (SO₂) Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), the combined SO₂ emissions from the LMF (Stack 61), EAF #1 South (Stack 01) and EAF #2 North (Stack 92) shall not exceed 0.2 pounds per ton of steel produced and 80 pounds of SO₂ per hour.
- (b) Pursuant to CP 033-8091-00043, issued June 24, 1997 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), the SO₂ emissions from the EAFs shall be controlled by the use of high quality scrap and monitoring the sulfur content of the coke.

D.1.5 Carbon Monoxide (CO) Limitations - Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the CO emissions from EAFs shall be controlled by an adjustment gap between the EAF direct shell evacuation system (DSE) and the remaining water cooled duct to common baghouse. The CO emissions from each EAF shall not exceed 2.0 pounds per ton of hot steel produced. The total emissions from EAF #1 South (Stack 1) and EAF #2 North (Stack 92) shall not exceed 800 pounds per hour. A negative pressure shall be maintained at the gap. The direct shell evacuation system, Baghouse 1, and Baghouse 2 shall be operated at all times when the EAFs are in operation.

D.1.6 Volatile Organic Compounds (VOC) Limitations - Best Available Control Technology [326 IAC 2-2][326 IAC 8-1-6]

Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review Requirements):

- (a) VOC emissions from EAFs shall be controlled through a scrap management program. The Permittee shall implement the SMP, which shall be in writing and available for inspection. The SMP shall provide at a minimum:
 - (1) All grades of scrap charged to the furnaces shall not contain excessive non-metallics.
 - (2) All grades of scrap shall not contain excessive oil and grease.
 - (3) Heavily oiled scrap shall not be used.

- (b) VOC emissions from the EAFs shall be limited to 0.13 pounds of VOC emissions per ton of steel produced. The total VOC emissions from EAF #1 South (Stack 1) and EAF #2 North (Stack 92) shall not exceed 52.0 pounds per hour.

D.1.7 Lead Limitations - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD Control Technology Review Requirements), the total lead emissions from EAF Baghouse 1 (Stack 1) and EAF Baghouse 2 (Stack 92) shall not exceed 0.19 pounds per hour.

D.1.8 Mercury Limitations [326 IAC 2-2]

Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD Control Technology Review Requirements), the total mercury emissions from EAF Baghouse 1 and EAF Baghouse 2 shall not exceed 0.022 pounds per hour. Compliance with this limit will render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.9 Visible Emission Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), visible emissions from the EAF Baghouse 1 and EAF Baghouse 2 stack exhausts (Stack 1 and Stack 92, respectively) shall not exceed three percent (3%) opacity, based on a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9). This condition will satisfy the NSPS 40 CFR Part 60 Subpart AAa, 40 CFR 60.272a.
- (b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), the fugitive emissions generated by the EAFs shall not exceed three percent (3%) opacity from any building opening as determined by a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9). Three percent (3%) opacity is reflective of 100 percent capture.
- (c) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), the EAF slag pit dig out operation located beneath each furnace shall not exceed five (5%) percent opacity. Each EAF slag pit dig out operation shall be controlled with the use of its associated EAF's baghouse.
- (d) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), visible emissions from the building opening and EAF dust handling system shall not exceed three percent (3%) opacity based on a six-minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).
- (e) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), the carbon and flux additive system conveyors and transfer points shall be enclosed and vented indoors.
- (f) Pursuant to PSD SSM 033-23028-00076 and 326 IAC 2-2-3 (BACT), visible emissions of the exhaust from EAF dust silo 5c shall not exceed three percent (3%) opacity, based on a six (6) minute average (24 readings taken in accordance with EPA Method 9, Appendix A).

D.1.10 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A (General Provisions), which are incorporated by reference in 326 IAC 12-1, apply to the EAFs, except when otherwise specified in 40 CFR Part 60, Subpart AAa.

D.1.11 Visible Emissions Limitations (NSPS) [40 CFR Part 60.272(a)]

- (a) Pursuant to 40 CFR 60.272(a)(2), the visible emissions from the EAF Baghouse 1 and EAF Baghouse 2 stack exhausts (Stack 1 and Stack 92, respectively) shall not exceed three percent (3%) opacity, based on a six-minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).

- (b) Pursuant to 40 CFR 60.272(a)(3), the visible emissions from the melt shop due solely to the operations of the electric arc furnace shall not exceed six percent (6%) opacity, based on a six-minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).
- (c) Pursuant to 40 CFR 60.272(b), the visible emissions from the EAF dust handling system shall not exceed ten percent (10%) opacity, based on a six-minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).

D.1.12 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for the EAFs, continuous casters (#1 and #2), EAF dust silo 5c and associated control devices. Condition B.10 - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements

D.1.13 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11][40 CFR 60, Subpart AAa]

- (a) In order to demonstrate compliance with Condition D.1.2(a) - Particulate (PM/PM10) Limitations - Best Available Control Technology, the Permittee shall perform PM/PM10 testing on the EAF #1 South and EAF #2 North (Stack 01 and Stack 92) utilizing methods as approved by the Commissioner at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration
- (b) In order to demonstrate compliance with Conditions D.1.3(a) - Nitrogen Oxides (NO_x) Limitations - Best Available Control Technology, the Permittee shall perform NO_x testing on EAF #1 South and EAF #2 North (Stack 01 and Stack 92), utilizing methods as approved by the Commissioner at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.
- (c) In order to demonstrate compliance with Conditions D.1.4(a) - Sulfur Dioxide (SO₂) Limitations - Best Available Control Technology, the Permittee shall perform simultaneous, SO₂ testing on EAF #1 South, EAF #2 North and the LMF (Stack 01, Stack 92 and LMF Stack 61), utilizing methods as approved by the Commissioner at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.
- (d) In order to demonstrate compliance with Conditions D.1.5 - Carbon Monoxide (CO) Limitations - Best Available Control Technology, the Permittee shall perform CO testing on EAF #1 South and EAF #2 North (Stack 01 and Stack 92) utilizing methods as approved by the Commissioner at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.
- (e) In order to demonstrate compliance with Conditions D.1.6(b) - Volatile Organic Compounds (VOC) Limitations - Best Available Control Technology, the Permittee shall perform VOC testing on EAF #1 South and EAF #2 North (Stack 01 and Stack 92) utilizing methods as approved by the Commissioner at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.
- (f) In order to demonstrate compliance with Conditions D.1.7 - Lead Limitations - Best Available Control Technology and D.1.8 - Mercury Limitations, the Permittee shall perform lead and mercury testing on EAF #1 South (Stack 01) and EAF #2 North (Stack 92) utilizing methods as approved by the Commissioner at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.
- (g) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Condition C.8 - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.1.14 Particulate Control

- (a) Bin vent filter 5c shall control emissions from EAF dust silo 5c at all times necessary to meet the requirements of Condition D.1.2(d) – Particulate (PM/PM-10) Limitations – Best Available Control Technology.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.15 Visible Emission Notations

- (a) Pursuant to CP 033-8091-00043, issued June 25, 1997, and PSD SSM 033-23028-00043, visible emission notations of the melt shop building openings, dust handling system, melt shop roof monitors and bin vent filter 5c shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, at least 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. Condition C.14- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

D.1.16 New Source Performance Standards – Emission Monitoring [40 CFR 60.273a]

Pursuant to 326 IAC 12 and 40 CFR 60.273a:

- (a) Except as provided under paragraphs (b) and (c) of this section, a continuous monitoring system for the measurement of the opacity of emissions discharged into the atmosphere from the control device(s) shall be installed, calibrated, maintained, and operated by the owner or operator subject to the provisions of this subpart.
- (b) No continuous monitoring system shall be required on any control device serving the dust-handling system.
- (c) A continuous monitoring system for the measurement of the opacity of emissions discharged into the atmosphere from the control device(s) is not required on any modular, multi-stack, negative-pressure or positive-pressure fabric filter if observations of the opacity of the visible emissions from the control device are performed by a certified visible emission observer; or on any single-stack fabric filter if visible emissions from the control device are performed by a certified visible emission observer and the owner installs and continuously operates a bag leak detection system according to paragraph (e) of this section. Visible emission observations shall be conducted at least once per day for at least three 6-minute periods when the furnace is operating in the melting and refining period. All visible emissions observations shall be conducted in accordance with Method 9. If visible emissions occur from more than one point, the opacity shall be recorded for any points where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible

emission, only one set of three 6-minute observations will be required. In that case, the Method 9 observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident. Records shall be maintained of any 6-minute average that is in excess of the emission limit specified in §60.272a(a).

- (d) A furnace static pressure monitoring device is not required on any EAF equipped with a DEC system if observations of shop opacity are performed by a certified visible emission observer as follows: Shop opacity observations shall be conducted at least once per day when the furnace is operating in the meltdown and refining period. Shop opacity shall be determined as the arithmetic average of 24 consecutive 15-second opacity observations of emissions from the shop taken in accordance with Method 9. Shop opacity shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one observation of shop opacity will be required. In this case, the shop opacity observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.
- (e) A bag leak detection system must be installed and continuously operated on all single-stack fabric filters if the owner or operator elects not to install and operate a continuous opacity monitoring system as provided for under paragraph (c) of this section. In addition, the owner or operator shall meet the visible emissions observation requirements in paragraph (c) of this section. The bag leak detection system must meet the specifications and requirements of paragraphs (e)(1) through (8) of this section.
 - (1) The bag leak detection system must be certified by the manufacturer to be capable of detecting particulate matter emissions at concentrations of 1 milligram per actual cubic meter (0.00044 grains per actual cubic foot) or less.
 - (2) The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means (e.g., using a strip chart recorder or a data logger.)
 - (3) The bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate loading is detected over the alarm set point established according to paragraph (e)(4) of this section, and the alarm must be located such that it can be heard by the appropriate plant personnel.
 - (4) For each bag leak detection system required by paragraph (e) of this section, the owner or operator shall develop and submit to the Administrator or delegated authority, for approval, a site-specific monitoring plan that addresses the items identified in paragraphs (i) through (v) of this paragraph (e)(4). For each bag leak detection system that operates based on the triboelectric effect, the monitoring plan shall be consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015). The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times. The plan shall describe the following:
 - (i) Installation of the bag leak detection system;
 - (ii) Initial and periodic adjustment of the bag leak detection system including how the alarm set-point will be established;
 - (iii) Operation of the bag leak detection system including quality assurance procedures;
 - (iv) How the bag leak detection system will be maintained including a routine maintenance schedule and spare parts inventory list; and
 - (v) How the bag leak detection system output shall be recorded and stored.

- (5) The initial adjustment of the system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time (if applicable).
- (6) Following initial adjustment, the owner or operator shall not adjust the averaging period, alarm set point, or alarm delay time without approval from the Administrator or delegated authority except as provided for in paragraphs (e)(6)(i) and (ii) of this section.
 - (i) Once per quarter, the owner or operator may adjust the sensitivity of the bag leak detection system to account for seasonal effects including temperature and humidity according to the procedures identified in the site-specific monitoring plan required under paragraphs (e)(4) of this section.
 - (ii) If opacities greater than zero percent are observed over four consecutive 15-second observations during the daily opacity observations required under paragraph (c) of this section and the alarm on the bag leak detection system does not sound, the owner or operator shall lower the alarm set point on the bag leak detection system to a point where the alarm would have sounded during the period when the opacity observations were made.
- (7) For negative pressure, induced air baghouses, and positive pressure baghouses that are discharged to the atmosphere through a stack, the bag leak detection sensor must be installed downstream of the baghouse and upstream of any wet scrubber.
- (8) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- (f) For each bag leak detection system installed according to paragraph (e) of this section, the owner or operator shall initiate procedures to determine the cause of all alarms within 1 hour of an alarm. Except as provided for under paragraph (g) of this section, the cause of the alarm must be alleviated within 3 hours of the time the alarm occurred by taking whatever corrective action(s) are necessary. Corrective actions may include, but are not limited to, the following:
 - (1) Inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in particulate emissions;
 - (2) Sealing off defective bags or filter media;
 - (3) Replacing defective bags or filter media or otherwise repairing the control device;
 - (4) Sealing off a defective baghouse compartment;
 - (5) Cleaning the bag leak detection system probe or otherwise repairing the bag leak detection system; and
 - (6) Shutting down the process producing the particulate emissions.
- (g) In approving the site-specific monitoring plan required in paragraph (e)(4) of this section, the Administrator or delegated authority may allow owners or operators more than 3 hours to alleviate specific conditions that cause an alarm if the owner or operator identifies the condition that could lead to an alarm in the monitoring plan, adequately explains why it is not feasible to alleviate the condition within 3 hours of the time the alarm occurred, and demonstrates that the requested additional time will ensure alleviation of the condition as expeditiously as practicable.

D.1.17 New Source Performance Standards – Monitoring of Operations [40 CFR 60.274a]

Pursuant to 326 IAC 12 and 40 CFR 60.274a:

- (a) The owner or operator subject to the provisions of this subpart shall maintain records of the following information:
 - (1) All data obtained under paragraph (b) of this section; and
 - (2) All monthly operational status inspections performed under paragraph (c) of this section.
- (b) Except as provided under paragraph (e) of this section, the owner or operator subject to the provisions of this subpart shall check and record on a once-per-shift basis the furnace static pressure (if DEC system is in use, and a furnace static pressure gauge is installed according to paragraph (f) of this section) and either: check and record the control system fan motor amperes and damper position on a once-per-shift basis; install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet and check and record damper positions on a once-per-shift basis. The monitoring device(s) may be installed in any appropriate location in the exhaust duct such that reproducible flow rate monitoring will result. The flow rate monitoring device(s) shall have an accuracy of ± 10 percent over its normal operating range and shall be calibrated according to the manufacturer's instructions. The Administrator may require the owner or operator to demonstrate the accuracy of the monitoring device(s) relative to Methods 1 and 2 of appendix A of this part.
- (c) When the owner or operator of an affected facility is required to demonstrate compliance with the standards under §60.272a(a)(3) and at any other time that the Administrator may require (under section 114 of the CAA, as amended) either: the control system fan motor amperes and all damper positions, the volumetric flow rate through each separately ducted hood, or the volumetric flow rate at the control device inlet and all damper positions shall be determined during all periods in which a hood is operated for the purpose of capturing emissions from the affected facility subject to paragraph (b) of this section. The owner or operator may petition the Administrator for reestablishment of these parameters whenever the owner or operator can demonstrate to the Administrator's satisfaction that the affected facility operating conditions upon which the parameters were previously established are no longer applicable. The values of these parameters as determined during the most recent demonstration of compliance shall be maintained at the appropriate level for each applicable period. Operation at other than baseline values may be subject to the requirements of §60.276a(c).
- (d) Except as provided under paragraph (e) of this section, the owner or operator shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture system (i.e., pressure sensors, dampers, and damper switches). This inspection shall include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion). Any deficiencies shall be noted and proper maintenance performed.
- (e) The owner or operator may petition the Administrator to approve any alternative to either the monitoring requirements specified in paragraph (b) of this section or the monthly operational status inspections specified in paragraph (d) of this section if the alternative will provide a continuous record of operation of each emission capture system.
- (f) Except as provided for under §60.273a(d), if emissions during any phase of the heat time are controlled by the use of a DEC system, the owner or operator shall install, calibrate, and maintain a monitoring device that allows the pressure in the free space inside the EAF to be monitored. The pressure shall be recorded as 15-minute integrated averages. The monitoring device may be installed in any appropriate location in the EAF or DEC duct prior to the introduction of ambient air such that reproducible results will be

obtained. The pressure monitoring device shall have an accuracy of ± 5 mm of water gauge over its normal operating range and shall be calibrated according to the manufacturer's instructions.

- (g) Except as provided for under §60.273a(d), when the owner or operator of an EAF controlled by a DEC is required to demonstrate compliance with the standard under §60.272a(a)(3), and at any other time the Administrator may require (under section 114 of the Clean Air Act, as amended), the pressure in the free space inside the furnace shall be determined during the meltdown and refining period(s) using the monitoring device required under paragraph (f) of this section. The owner or operator may petition the Administrator for reestablishment of the pressure whenever the owner or operator can demonstrate to the Administrator's satisfaction that the EAF operating conditions upon which the pressures were previously established are no longer applicable. The pressure determined during the most recent demonstration of compliance shall be maintained at all times when the EAF is operating in a meltdown and refining period. Operation at higher pressures may be considered by the Administrator to be unacceptable operation and maintenance of the affected facility.
- (h) During any performance test required under §60.8, and for any report thereof required by §60.276a(f) of this subpart, or to determine compliance with §60.272a(a)(3) of this subpart, the owner or operator shall monitor the following information for all heats covered by the test:
- (1) Charge weights and materials, and tap weights and materials;
 - (2) Heat times, including start and stop times, and a log of process operation, including periods of no operation during testing and the pressure inside an EAF when direct-shell evacuation control systems are used;
 - (3) Control device operation log; and
 - (4) Continuous opacity monitor or Method 9 data.

[49 FR 43845, Oct. 31, 1984, as amended at 64 FR 10111, Mar. 2, 1999; 65 FR 61758, Oct. 17, 2000; 70 FR 8533, Feb. 22, 2005]

Record Keeping and Reporting Requirements

D.1.18 Record Keeping Requirements

- (a) To document the compliance status with the Conditions D.1.3 - Nitrogen Oxides (NO_x) Limitations - Best Available Control Technology, D.1.4 - Sulfur Dioxide (SO₂) Limitations - Best Available Control Technology, D.1.5 - Carbon Monoxide (CO) Limitations - Best Available Control Technology, and D.1.6(b) - Volatile Organic Compounds (VOC) Limitations - Best Available Control Technology, the Permittee shall record the metal throughput for the EAF operations.
- (b) To document compliance with Conditions D.1.9 - Visible Emission Limitations - Best Available Control Technology and D.1.15 - Visible Emissions Notations, the Permittee shall maintain records of visible emission notations required by Condition D.1.15 - Visible Emissions Notations. 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) Condition C.17 - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.19 Record Keeping and Reporting Requirements [40 CFR 60.276a]

Pursuant to 326 IAC 12 and 40 CFR 60.276a:

- (a) Records of the measurements required in §60.274a must be retained for at least 2 years following the date of the measurement.

- (b) Each owner or operator shall submit a written report of exceedances of the control device opacity to the Administrator semi-annually. For the purposes of these reports, exceedances are defined as all 6-minute periods during which the average opacity is 3 percent or greater.
- (c) Operation at a furnace static pressure that exceeds the value established under §60.274a(g) and either operation of control system fan motor amperes at values exceeding ± 15 percent of the value established under §60.274a(c) or operation at flow rates lower than those established under §60.274a(c) may be considered by the Administrator to be unacceptable operation and maintenance of the affected facility. Operation at such values shall be reported to the Administrator semiannually.
- (d) The requirements of this section remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such State. In that event, affected sources within the State will be relieved of the obligation to comply with this section, provided that they comply with the requirements established by the State.
- (e) When the owner or operator of an EAF or AOD is required to demonstrate compliance with the standard under §60.275 (b)(2) or a combination of (b)(1) and (b)(2) the owner or operator shall obtain approval from the Administrator of the procedure(s) that will be used to determine compliance. Notification of the procedure(s) to be used must be postmarked at least 30 days prior to the performance test.
- (f) For the purpose of this subpart, the owner or operator shall conduct the demonstration of compliance with §60.272a(a) of this subpart and furnish the Administrator a written report of the results of the test. This report shall include the following information:
 - (1) Facility name and address;
 - (2) Plant representative;
 - (3) Make and model of process, control device, and continuous monitoring equipment;
 - (4) Flow diagram of process and emission capture equipment including other equipment or process(es) ducted to the same control device;
 - (5) Rated (design) capacity of process equipment;
 - (6) Those data required under §60.274a(h) of this subpart;
 - (i) List of charge and tap weights and materials;
 - (ii) Heat times and process log;
 - (iii) Control device operation log; and
 - (iv) Continuous opacity monitor or Method 9 data.
 - (7) Test dates and test times;
 - (8) Test company;
 - (9) Test company representative;
 - (10) Test observers from outside agency;
 - (11) Description of test methodology used, including any deviation from standard reference methods;
 - (12) Schematic of sampling location;
 - (13) Number of sampling points;

- (14) Description of sampling equipment;
 - (15) Listing of sampling equipment calibrations and procedures;
 - (16) Field and laboratory data sheets;
 - (17) Description of sample recovery procedures;
 - (18) Sampling equipment leak check results;
 - (19) Description of quality assurance procedures;
 - (20) Description of analytical procedures;
 - (21) Notation of sample blank corrections; and
 - (22) Sample emission calculations.
- (g) The owner or operator shall maintain records of all shop opacity observations made in accordance with §60.273a(d). All shop opacity observations in excess of the emission limit specified in §60.272a(a)(3) of this subpart shall indicate a period of excess emission, and shall be reported to the administrator semi-annually, according to §60.7(c).
- (h) The owner or operator shall maintain the following records for each bag leak detection system required under §60.273a(e):
- (1) Records of the bag leak detection system output;
 - (2) Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings; and
 - (3) An identification of the date and time of all bag leak detection system alarms, the time that procedures to determine the cause of the alarm were initiated, if procedures were initiated within 1 hour of the alarm, the cause of the alarm, an explanation of the actions taken, the date and time the cause of the alarm was alleviated, and if the alarm was alleviated within 3 hours of the alarm.

[49 FR 43845, Oct. 31, 1984, as amended at 54 FR 6673, Feb. 14, 1989; 64 FR 10111, Mar. 2, 1999; 65 FR 61758, Oct. 17, 2000; 70 FR 8533, Feb. 22, 2005]

D.1.20 Reporting Requirements [40 CFR 60.276a][326 IAC 3-5-7]

- (a) If the Permittee elects to operate a COMs under Condition D.1.16 - New Source Performance Standards - Emission Monitoring, then the Permittee shall submit to IDEM, OAQ a quarterly excess emissions report, if applicable, based on the continuous opacity monitor (COM) data, pursuant to 326 IAC 3-5-7. These reports shall be submitted no later than thirty (30) calendar days following the end of each calendar quarter being reported. Condition C.18 - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition.
- (b) The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.21 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants Under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.10690, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the electric arc furnace steelmaking facilities as specified in Table 1 of 40 CFR 63, Subpart YYYYYY in accordance with schedule in 40 CFR 63 Subpart YYYYYY.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

D.1.22 National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities [40 CFR Part 63, Subpart YYYYYY]

The Permittee shall comply with the following provisions of 40 CFR 63, Subpart YYYYYY (included as Attachment A):

- (1) 40 CFR 63.10680(a), (b)(1), (c) and (d)
- (2) 40 CFR 63.10681(a)
- (3) 40 CFR 63.10685(a), (b)(1), (b)(2)(i)(iv), (c)(1), and (c)(2)
- (4) 40 CFR 63.10686(a), (b), (d)(1) – (d)(4), (d)(6), (e)
- (5) 40 CFR 63.10692
- (6) Table 1 to 40 CFR 63, Subpart YYYYYY

SECTION D.2 FACILITY OPERATION CONDITIONS (LADLE METALLURGICAL)

Facility Description [326 IAC 2-7-5(15)]:

Ladle Metallurgical Stations

Two (2) Ladle Metallurgical Stations (LMS) (South permitted in 1994 for construction and North permitted in 1998 for construction), each with a nominal capacity of 200 tons per hour. Particulate (PM/PM10) emissions are controlled by the Ladle Metallurgical Furnaces (LMF) baghouse (permitted in 1998 for construction, with a nominal air flow rate of 200,000 standard cubic feet per minute) exhausting through Stack 61. The LMS consists of the following:

- (a) Three (3) Ladle Metallurgical furnaces (LMF), and
- (b) Two (2) stir stations,

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

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

D.2.1 Particulate (PM/PM-10) Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), PM/PM-10 emissions from the ladle metallurgical stations (LMS) and stir stations shall be captured by a side draft hood and exhausted to the LMF baghouse to Stack 61.
- (b) Pursuant to CP 033-9187-00043, March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), PM/PM-10 filterable emissions from the LMF Stack 61 shall not exceed 0.0032 grains per dry standard cubic foot and 5.49 pounds per hour.

D.2.2 Nitrogen Oxides (NO_x) Limitations- Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-9187-00043 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the NO_x emissions from the LMF Stack 61 shall not exceed 0.025 pounds per ton and 10 pounds of NO_x emissions per hour.

D.2.3 Carbon Monoxide (CO) Limitations- Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), CO emissions from LMF Stack 61 shall not exceed 0.1 pounds per ton of steel produced and 40 pounds of CO per hour.

D.2.4 VOC Minor Limitations [326 IAC 2-2]

Pursuant to CP 033-9187-00043, issued March 24, 1998, and Significant Permit Modification No. 033-28134-00043, VOC emissions from the LMF Stack 61 shall not exceed 0.0082 pounds per ton and 3.28 pounds of VOC per hour.

Compliance with these emission limits will ensure that the VOC emissions from CP 033-9187-00043 are less than forty (40) tons per year and therefore will render the requirements of 326 IAC 2-2 not applicable to CP 033-9187-00043 for VOC.

D.2.5 Visible Emission Limitations - Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), visible emissions from the LMF baghouse Stack 61 shall not exceed three percent (3%) opacity based on a six-minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for the LMF and the associated control devices. Condition B.10 - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements

D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.2.1- Particulate (PM/PM-10) Limitations – Best Available Control Technology, the Permittee shall perform PM/PM10 testing on the LMF Stack 61 utilizing methods as approved by the Commissioner at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.
- (b) In order to demonstrate compliance with Condition D.2.2 - Nitrogen Oxide (NOx) Limitations - Best Available Control Technology, the Permittee shall perform NOx testing on the LMF Stack 61 utilizing methods as approved by the Commissioner at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.
- (c) In order to demonstrate compliance with Conditions D.2.4 - Carbon Monoxide (CO) Limitations - Best Available Control Technology, the Permittee shall perform CO testing on the LMF Stack 61 utilizing methods as approved by the Commissioner at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.
- (d) Not later than twelve (12) months after issuance of Significant Permit Modification No. 033-28134-00043 and in order to demonstrate compliance with Condition D.2.4 – VOC Minor Limitations, the Permittee shall perform VOC testing on the LMF Stack 61, utilizing testing methods approved by the Commissioner at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.
- (e) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Condition C.8 - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.2.8 Particulate Control [326 IAC 2-7-6(6)]

- (a) The LMF baghouse shall be operated at all times when the LMSs and stir stations are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.9 Visible Emission Notations

- (a) Pursuant to CP 033-9187-00043, issued March 24, 1998, visible emission notations of the LMF Baghouse Stack 61 exhaust, shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, at least 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. Condition C.14- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

D.2.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with the LMF at least once per day when the LMF is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 to 10.0 inches of water or a range established during the latest Stack test, the Permittee shall take reasonable response steps. Condition C.14- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Condition C.11 - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer specifications, if used.

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

D.2.11 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.9 - Visible Emission Notations, the Permittee shall maintain records of visible emission notations of the LMF Stack 61 exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that day).
- (b) To document the compliance status with Condition D.2.10 - Parametric Monitoring, the Permittee shall maintain records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) Condition C.17 - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Hot Mill Operations – Tunnel Furnaces

- (a) One (1) tunnel furnace, No. 1 South, permitted in 1994 for construction, using low NO_x burners, with a nominal heat input capacity of 117.9 MMBtu per hour (nominal 92 MMBtu per hour in the heating zone and nominal 25.9 MMBtu per hour in the holding zone), exhausting through Stack 2.
- (b) One (1) tunnel furnace, No. 2 North, permitted in 1997 for construction, using low NO_x burners with a nominal heat input capacity of 92 MMBtu per hour in the heating zone, exhausting through Stack 42.

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

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

D.3.1 Nitrogen Oxides (NO_x) Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), Tunnel Furnace No. 1 shall be equipped with low NO_x natural gas fired burners -and NO_x emissions shall not exceed 0.17 pounds per MMBtu. The total emissions per hour shall not exceed 20.0 pounds per hour through Stack 2.
- (b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), Tunnel Furnace No. 2 heating zone shall be equipped with low NO_x natural gas fired burners and NO_x emissions shall not exceed 0.10 pounds per MMBtu. The total emissions per hour shall not exceed 9.2 pounds per hour through Stack 42.

D.3.2 Visible Emissions Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), visible emissions from Tunnel furnace No. 1 (Stack 2), shall not exceed five percent (5%). The opacity shall be determined by 40 CFR 60, Appendix A, Method 9.
- (b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), visible emissions from Tunnel Furnace No. 2 (Stack 42), shall not exceed three percent (3%) opacity based on a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9.).

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

A Preventive Maintenance Plan is required for the Tunnel Furnace No. 1 and Tunnel Furnace No.2 natural gas fired burners. Condition B.10 - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

SECTION D.4 FACILITY OPERATION CONDITIONS (PICKLE LINE)

Facility Description [326 IAC 2-7-5(15)]:

Cold Mill Operations - Pickling Line

One (1) pickling line, with a nominal capacity of 1.4 million ton per year, permitted in 1996 for construction, with a packed scrubber and covered tanks maintained under negative pressure, for Hydrochloric Acid (HCl) control, and a mist eliminator for PM/PM-10 control, exhausting to Stack 17.

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

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

D.4.1 Particulate Matter Emissions Limitations - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the pickle line particulate matter emissions shall be controlled by a scrubber and the filterable particulate matter emissions from Stack 17 shall not exceed 1.23 pounds per hour. The scrubber shall be operated at all times when the pickle line is in operation.

D.4.2 Hydrochloric Acid (HCl) Pickling HAP Minor Emission Limitation [40 CFR 63, Subpart CCC]

Pursuant to CP 033-5625-00043, issued August 8, 1996, the hydrochloric acid mist from the pickle line shall be controlled by a scrubber and mist eliminator. Emissions shall not exceed 0.32 pounds per hour. The scrubber and mist eliminator shall be operated at all times when the pickle line is in operation.

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

A Preventive Maintenance Plan is required for the pickle line, scrubber and mist eliminator. Condition B.10 - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

In order to comply with condition D.4.2 - Hydrochloric Acid (HCL) Pickling HAP Minor Emission Limitation, the Permittee shall perform a hydrochloric acid test on the pickle line Stack 17, utilizing methods as approved by the Commissioner at least once five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Condition C.8 - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.4.5 Parametric Monitoring

- (a) The Permittee shall record the flow rate of the packed scrubber used in conjunction with the Pickling Line, at least once per day when the Pickling Line is in operation. When for any one reading, the flow rate of the scrubber is below a minimum of six (6) gallons per minute (gpm) or a minimum flow rate established during the latest Stack test, the Permittee shall take reasonable response steps. Condition C.14- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. A flow rate that is below the above mentioned minimum is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (b) The instrument used for determining the flow rate shall comply with Condition C.11 - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six (6) months or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer specifications, if used.

D.4.6 Scrubber Failure Detection

In the event, a scrubber failure has been observed:

- (a) For a scrubber controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Condition B.11 - Emergency Provisions).
- (b) For a scrubber controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Condition B.11 - Emergency Provisions).

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

D.4.7 Record Keeping Requirements

- (a) To document compliance with Condition D.4.5 - Parametric Monitoring, the Permittee shall maintain records of the once per day pickle line scrubber flow rate during normal operation. The Permittee shall include in its daily record when a flow rate reading is not taken and the reason for the lack of a flow rate reading (e.g. the process did not operate that day).
- (b) Condition C.17 - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.5 FACILITY OPERATION CONDITIONS (PICKLE LINE BOILERS)

Facility Description [326 IAC 2-7-5(15)]:

Pickle Line Scale Breaker

One (1) scale breaker, permitted in 1996 for construction, with a nominal capacity of 1.4 million tons per year that removes scale from the rolled steel prior to the pickling process. Particulate (PM/PM10) emissions are controlled by a baghouse with a nominal air flow rate of 10,600 acfm and exhausting to Stack 60.

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

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

D.5.1 Particulate Matter Emissions - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to 326 IAC 2-2 BACT, the pickle line scale breaker particulate matter PM/PM10 emissions shall be controlled by a baghouse with an outlet grain loading of 0.003 gr/dscf and PM/PM10 emissions shall not exceed 1.19 lb/hr.

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

A Preventive Maintenance Plan is required for the scale breaker and baghouse. Condition B.10 - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements

D.5.3 Particulate Control

The scale breaker baghouse shall be in operation at all times the scale breaker is in operation.

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

D.5.4 Visible Emission Notations

- (a) Visible emission notations of the pickle line scale breaker Stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, at least 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. Condition C.14- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

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

D.5.5 Record Keeping Requirements

- (a) To document compliance with Condition D.5.4 - Visible Emission Notations, the Permittee shall maintain records of the once per day visible emission notations. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that day).
- (b) Condition C.17 - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.6 FACILITY OPERATION CONDITIONS (PICKLE LINE BOILERS)

Facility Description [326 IAC 2-7-5(15)]:

Pickle Line Boilers

Three (3) natural gas fired boilers Nos. 1, 2 and 3, two (2) permitted in 1996 for construction and one (1) permitted in 2006, equipped with low NOx burners, exhausting to Stacks 15, 16a and 16b. The nominal heat input for each boiler is 20.4 MMBtu per hour. Only two (2) boilers will be utilized at any given time.

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

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

D.6.0 Particulate Emission Limitations [326 AC 6-2-4] and Nitrogen Oxides (NOx) Limitations – Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) and 326 IAC 2-2 (BACT), only two of the three boilers Nos. 1, 2 and 3, shall be utilized at any time.

D.6.1 Particulate Emission Limitations [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions shall not exceed 0.42 pound per MMBtu heat input from the pickle line boilers with a combined heat input of 40.8 MMBtu per hour.

D.6.2 Nitrogen Oxides (NOx) Limitations - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the pickle line boilers shall not exceed 81 pounds per million cubic feet (MMCF) of gas burned.

D.6.3 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

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

D.6.4 Particulate (PM/PM-10) and Sulfur Dioxide (SO₂) Limitations (NSPS) [40 CFR 60, Subpart Dc] [326 IAC 12-1]

Pursuant to CP 033-5625-00043, issued August 8, 1996, 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial Boilers Commercial-Institutional Steam Generating Boilers) and 326 IAC 12-1, the pickle line boilers shall burn natural gas only in order to minimize particulate and sulfur dioxide emissions.

D.6.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for the pickle line boilers. Condition B.10 - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

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

D.6.6 Record Keeping Requirements

- (a) To document compliance with Condition D.6.4 - Particulate (PM/PM-10) and Sulfur Dioxide (SO₂) Limitations (NSPS), the Permittee shall maintain records of the natural gas usage for the boilers.
- (b) To document compliance with Condition D.6.2 - Nitrogen Oxide (NOx) Limitations - Best Available Control Technology, the Permittee shall maintain records of when Boiler No. 3 is used as a backup for Boiler No. 1 or Boiler No. 2.

- (c) Condition C.17 - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.7 FACILITY OPERATION CONDITIONS (REVERSING MILL)

Facility Description [326 IAC 2-7-5(15)]:

Reversing Mill

One (1) cold reversing mill, with a nominal capacity of one (1.0) million tons per year, permitted in 1996 for construction, with a mist eliminator for particulate (PM/PM10) emissions control, exhausting to Stack 18.

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

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

D.7.1 Particulate Matter Emissions - Best Available Control Technology (BACT) [326 IAC 2-2

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the filterable particulate matter emissions from the cold reversing mill shall be controlled by a mist eliminator. Particulate matter emissions from Stack 18 shall not exceed 7.2 pounds per hour.

Compliance Determination Requirements

D.7.2 Particulate Control

The reversing mill mist eliminator shall be in operation at all times the reversing mill is in operation.

SECTION D.8 FACILITY OPERATION CONDITIONS (GALVANIZING LINE)

Facility Description [326 IAC 2-7-5(15)]:

Galvanizing Lines

- (a) One (1) hot band galvanizing line with a nominal capacity of 400,000 tons of steel per year, permitted in 1996 for construction, heated by a low NOx burner natural gas fired heater with a nominal heat input of 45 MMBtu per hour, exhausting through Stack 19.
- (b) Twenty-four (24), natural gas fired radiant tube heaters associated with the galvanizing line, permitted in 2002 for construction. Each heater has a nominal heat input of 0.3 MMBtu per hour, exhausting inside the building.
- (c) One (1) cold rolled galvanizing line with a nominal capacity of 300,000 tons of steel per year, permitted in 1996 for construction, heated by a low NOx burner natural gas fired heater with a nominal heat input of 55 MMBtu per hour, exhausting to Stack 19.

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

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

D.8.1 Particulate Matter Emissions - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the hot band and cold roll galvanizing lines heaters shall burn natural gas only.

D.8.2 Nitrogen Oxides (NOx) - Best Available Control Technology (BACT) [326 IAC 2-2]

- (a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the hot band galvanizing line heater shall not exceed 200 pounds per MMCF of natural gas burned.
- (b) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the hot band galvanizing line heater shall use low-NOx burners.
- (c) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the cold roll galvanizing line heater shall not exceed 200 pounds per MMCF of natural gas burned.
- (d) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the cold roll galvanizing line heater shall use low-NOx burners.

D.8.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for the hot band line and cold roll line heaters and low NOx burners. Condition B.10 - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

SECTION D.9 FACILITY OPERATION CONDITIONS (ANNEALING)

Facility Description [326 IAC 2-7-5(15)]:

Annealing Furnaces

Sixteen (16) low NOx burners, natural gas fired annealing furnaces and forty (40) annealing bases, permitted in 1996 for construction. Each furnace has a nominal heat input of four (4) MMBtu per hour, exhausting through roof pipes 30, 31 and 32.

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

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

D.9.1 Particulate Matter Emissions - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the annealing furnaces shall burn natural gas only.

D.9.2 Nitrogen Oxides (NOx) - Best Available Control Technology (BACT) [326 IAC 2-2]

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the annealing furnaces shall not exceed 200 pounds per MMCF of natural gas burned.

(b) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the annealing furnaces shall be low-NOx burners.

D.9.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for the annealing furnaces and low NOx burners. Condition B.10 - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

SECTION D.10 FACILITY OPERATION CONDITIONS (PAINT LINE)

Facility Description [326 IAC 2-7-5(15)]:

Paint Line (Coil Coating Line)

- (a) One (1) 2-side, 2-coat coil coating line, permitted in 2002 for construction, using roll coating method, with a nominal capacity of 55,000 pounds per hour of the flat rolled steel, using a 60 MMBtu per hour heat input capacity burner equipped thermal oxidizer to control VOC emissions and exhausting to Stack 78.
- (b) Two (2) curing ovens, permitted in 2002 for construction, with a combined nominal heat input capacity of 16 MMBtu per hour using a 60 MMBtu per hour nominal heat input capacity burner equipped thermal oxidizer to control VOC emissions and exhausting to Stack 78.

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

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

D.10.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit [326 IAC 2-2][40 CFR Subpart SSSS]

Pursuant to SSM 033-15836-00043, issued December 31, 2002 and 326 IAC 2-2 (Prevention of Significant Deterioration) to maintain the minor status for this modification, the VOC emissions shall be limited as follows:

- (a) For the 2-side, 2-coat, coil-coating line the input of VOC shall be limited to less than 3894 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. This VOC usage limitation in conjunction with the operation of thermal oxidizer at 99% overall control efficiency limits VOC emissions from the coil coating line to less than 38.94 tons per twelve (12) consecutive month period.
- (b) The combined heat input rate for the two curing ovens shall not exceed 16 million Btu per hour and that for the thermal oxidizer shall not exceed 60 million Btu per hour. This limits the VOC emissions from the curing ovens to less than 0.02 tons per twelve (12) consecutive month period.
- (c) The items (a) and (b) combined, limits the VOC emissions from the 2-side, 2-coat coil coating line modification to less than 40 tons per 12 consecutive months period, with compliance demonstrated at the end of each month. This limit pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) makes this modification minor under this rule.
- (d) Pursuant to PSD SSM 033-23028-00043, issued October 26, 2007:
 - (1) The single HAP emissions from the coil coating line shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
 - (2) The combined HAP emissions from the coil coating line shall be limited to less than 14.6 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
 - (3) The thermal oxidizer for the coil coating line shall be in operation whenever the coating line is in operation.

Compliance with these limits and requirements, in conjunction with HAP limits on SDI - IDD's rotary hearth furnace and SDI - Flat Roll Division's pickle line, limits the source-wide PTE of a single HAP and a combination of HAPs to less than ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively, and renders the requirements of 40 CFR Part 63, Subpart SSSS not applicable.

D.10.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-4]

- (a) Pursuant to SSM 033-15836-00043, issued December 21, 2002 and 326 IAC 8-2-4 (Coil Coating Operations), the volatile organic compound (VOC) discharge to the atmosphere shall be limited to 2.6 pounds VOC per gallon of coating less water delivered to the coating applicator from prime and topcoat or single coat operations.
- (b) Pursuant to 326 IAC 8-1-2 (b), the coil coating line VOC emissions shall be limited to no greater than the equivalent emissions, 4.02 pounds of VOC per gallon of coating solids, allowed in (a).

The equivalency emissions are determined by the following equation:

$$E = L / (1 - (L/D))$$

Where:

- L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating.
- D = Density of VOC in coating in pounds per gallon of VOC.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the coil coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (c) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency of 46.04% calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

D.10.3 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart TT.

D.10.4 Metal Coil Surface Coating NSPS [326 IAC 12-1-1] [40 CFR 60, Subpart TT]

This facility is subject to 40 CFR 60, Subpart TT, which is incorporated by reference in 326 IAC 12-1-1. Permittee shall not cause to be discharged into the atmosphere more than:

- (a) 1.17 pounds of VOC per gallon of coating solids applied for each calendar month for 2-side, 2-coat, coating line that continuously uses a thermal oxidizer operated at the most recently demonstrated overall efficiency.

-or-

- (b) 10 percent of the VOCs applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency.

D.10.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for the coil coating operation and associated control device. Condition B.10 - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements

D.10.6 Permanent Total Enclosure

In order to maintain the minor status for the 2-side, 2-coat, coil coating line, the Permittee shall use a permanent total enclosure:

- (a) The capture system for the 2-side, 2-coat, coil coating line shall meet the criteria for a Permanent Total Enclosure as described in 40 CFR 51, Method 204.

-or-

- (b) Verify 100% capture through other methods as approved by the Commissioner.

D.10.7 Thermal Oxidizer

The thermal oxidizer shall operate with a control efficiency of not less than 99% at all times that the 2-side, 2-coat, coil coating line is in operation. This efficiency is necessary to ensure compliance with conditions D.10.1 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit, D.10.2 - Volatile Organic Compounds (VOC), and D.10.4 - Metal Coil Surface Coating NSPS.

D.10.8 Testing Requirements [326 IAC 12, 40 CFR 60.463]

- (a) The Permittee shall conduct a performance test for each calendar month for each affected facility according to the procedures under condition D.10.8(c), (d), (e), and (f).
- (b) 40 CFR 60.8(d) and (f) do not apply to the performance test.
- (c) The Permittee shall determine the overall reduction efficiency (R) for the capture system and the control device to determine compliance with condition D.10.4(b).

The Permittee may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c) (1), (2), and (3) of this section, shall be repeated when directed by the Administrator, IDEM, OAQ or when the Permittee elects to operate the control device or capture system at conditions different from the initial performance test.

- (1) Determine the fraction (F) of total VOC's emitted by an affected facility that enters the control device using the following equation:

$$F = \frac{\sum_{i=1}^l C_{bi} Q_{bi}}{\sum_{i=1}^l C_{bi} Q_{bi} + \sum_{i=1}^p C_{fi} Q_{fi}}$$

Where:

- C_b = the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon).
- Q_b = the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour).
- C_{fi} = the VOC concentration in each gas stream emitted directly to the atmosphere (parts per million by volume, as carbon).
- Q_{fi} = the volumetric flow rate of each gas stream emitted directly to the atmosphere.
- l = the number of gas streams entering the control device, and
- p = the number of gas streams emitted directly to the atmosphere.

- (2) Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation:

$$E = \frac{\sum_{i=1}^n C_{bi} Q_{bi} - \sum_{i=1}^m C_a Q_a}{\sum_{i=1}^n C_{bi} Q_{bi}}$$

Where:

- C_a = the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million by volume, as carbon).
- Q_a = the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour).
- n = the number of gas streams entering the control device, and
- m = the number of gas streams leaving the control device and entering the atmosphere.

The Permittee shall construct the VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in § 60.466.

- (3) Determine overall reduction efficiency (R) using the following equation:

$$R = EF$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as specified in sections (d) and (e) below.

- (d) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility as follows:

(1) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied (G) during each calendar month for each affected facility, except as provided under paragraph (c)(1)(iv) of 40 CFR 60.463 as follows:

(A) Calculate the mass of VOC's used (M_o+M_d) during each calendar month for each affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj}$$

Where:

- M_o = Mass of VOC's in coatings consumed, as received in kilogram (kg)
- M_d = Mass of VOC-solvent added to the coatings, in kg
- L_c = the volume of each coating consumed, as received in liters
- L_d = the volume of each VOC-solvent added to the coatings in liters (l)
- W_o = the proportion of VOC's in each coating, as received (fraction by weight)
- D_d = density of each VOC-solvent added to the coatings (kg/l)
- ∑ L_{dj}D_{dj} = will be 0 if no VOC solvent is added to the coatings, as received
- n = the number of different coatings used during calendar month, and
- m = the number of different VOC solvents added to coatings used during the calendar month.

(A) Calculate the total volume of coating solids used (L_s) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^n V_{si} L_{ci}$$

Where

- V_s = the proportion of solids in each coating, as received (fraction by volume).
- L_c = the volume of each coating consumed, as received in liters
- L_s = total volume of solids used in a calendar month
- n = the number of different coatings used during the calendar month.

(e) Calculate the volume-weighted average mass of VOC's used per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s}$$

(f) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$$N = G (1-R)$$

- (g) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

D.10.9 Testing Requirements [326 IAC 3-6] [326 IAC 2-7-6(1), (6)]

- (a) In order to demonstrate compliance with Conditions D.10.1 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit and D.10.2 - Volatile Organic Compounds (VOC), the Permittee shall perform VOC emissions and thermal oxidizer control efficiency testing utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration.
- (b) The Permittee shall determine the hourly average temperature and duct pressure or fan amperage for the thermal oxidizer from the most recent valid stack test that demonstrates compliance with the limits in conditions D.10.1 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit and D.10.2 - Volatile Organic Compounds (VOC) as approved by IDEM.
- (c) In order to demonstrate compliance with Condition D.10.1(d) - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit, within 180 days of the end of the month in which it is determined that VOC emissions equal or exceed nine (9) tons for any twelve (12) consecutive month period, the Permittee shall perform inlet and outlet HAP testing on the thermal oxidizer controlling emissions from the coil coating line (Step #1). Testing shall be done utilizing Method 18 or other methods approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM or using an estimation method approved by IDEM. If the VOC emissions equal or exceed nine (9) tons for any twelve (12) consecutive month period more than once in a period of 4.5 years, then a subsequent test shall be conducted within 5 years from the date of the last valid compliance demonstration (Step #2). If within 4.5 years after the second valid compliance demonstration the VOC emissions do not equal or exceed nine (9) tons for any twelve (12) consecutive month period, then the Permittee is not required to repeat inlet and outlet HAP testing until the VOC emissions equal or exceed nine (9) tons for any twelve (12) consecutive month period at which time the Permittee shall repeat Step #1. If within 4.5 years after the second valid compliance demonstration the VOC emissions equal or exceed nine (9) tons for any twelve (12) consecutive month period, then the Permittee shall repeat Step #2.
- (d) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Condition C.8 - Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.

D.10.10 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Pursuant to SSM 033-15836-00043, issued December 1, 2002, and PSD SSM 033-23028-00043:

- (a) Compliance with Condition D.10.1 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit shall be demonstrated at the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at the VOC emission rate for 12 consecutive months period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

$$\text{VOC emitted} = [(\text{VOC input}) \times (100 - \text{Overall control efficiency of thermal oxidizer})] + [\text{uncontrolled VOC}]$$

Where VOC input is based on the formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

- (b) If VOC emissions from the 2-side, 2-coat coil line exceed nine (9) tons for any twelve consecutive month period, or the Permittee chooses to demonstrate compliance with Condition D.10.1(d) - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit using the HAP control efficiency, the Permittee shall determine the single and combination HAP emissions for each month using the following methodology:

$$\text{HAP emitted} = [(\text{HAP input}) \times (100 - \text{Overall control efficiency of thermal oxidizer})] + [\text{uncontrolled HAP}]$$

Where:

HAP input is based on the formulation data supplied by the coating manufacturer.

Until the initial Method 18 stack test is performed, an overall control efficiency of 99% shall be used in the equation above.

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

D.10.11 Thermal Oxidizer [326 IAC 12, 40 CFR 60.464]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer to continuously record the combustion temperature of any effluent gases incinerated to achieve compliance with D.10.1 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit, D.10.2 - Volatile Organic Compounds (VOC) and D.10.4 - Metal Coil Surface Coating NSPS. This system shall have an accuracy of $\pm 2.5^{\circ}\text{C}$ or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater.
- (b) The Permittee shall record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the thermal oxidizer used to control VOC emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with limit in D.10.1 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit, D.10.2 - Volatile Organic Compounds (VOC) and D.10.4 - Metal Coil Surface Coating NSPS was demonstrated during the most recent measurement of thermal oxidizer efficiency required by D.10.7 - Thermal Oxidizer - Prevention of Significant Deterioration (PSD) and D.10.8 - Testing Requirements.
- (c) The records required by 40 CFR 60.7 shall identify each such occurrence and its duration.
- (d) The Permittee shall observe the duct pressure or fan amperage at least once per day when the thermal oxidizer is in operation. The duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test.
- (e) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with the limits in Condition D.10.1 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP), as approved by IDEM.
- (f) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

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

D.10.12 Record Keeping and Reporting Requirements [326 IAC 12, 40 CFR 60.465]

- (a) The Permittee shall identify, record, and submit a written report to IDEM, OAQ every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under D.10.4 - Metal Coil Surface Coating NSPS. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to IDEM, OAQ, quarterly.
- (b) The Permittee shall include in the quarterly reports, instances when the thermal oxidizer temperature drops as defined under D.10.11 - Thermal Oxidizer. If no such periods occur, the owner or operator shall state this in the report.
- (c) The Permittee shall maintain at the source, for a period of at least two (2) years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. The Permittee shall maintain, at the source, daily records of the thermal oxidizer combustion temperature.

D.10.13 Record Keeping Requirements

- (a) To document the compliance status with Condition D.10.1 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.10.1 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a monthly basis.

Records may include, for example, purchase orders, invoices, and material safety data sheets (MSDS) or any other information necessary to verify the type and amount used.
 - (3) The total VOC usage for each month.
- (b) To document the compliance status with Conditions D.10.1 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit and D.10.11- Thermal Oxidizer, the Permittee shall maintain records in accordance with (1) through (2) below.
 - (1) The continuous temperature records (on a three hour average basis) for the thermal oxidizer and the average temperature used to demonstrate compliance during the most recent compliant stack test. The Permittee shall include in its continuous record when a temperature is not taken and the reason for the lack of a temperature recording (e.g. the process was not in operation).
 - (2) Daily records of the duct pressure or fan amperage. The Permittee shall include in its daily record when a pressure or amperage reading is not taken and the reason for the lack of pressure or amperage reading (e.g. the process did not operate that day).
- (c) If VOC emissions from the 2-side, 2-coat coil coating line equal or exceed nine (9) tons for any twelve (12) consecutive month period, or the Permittee chooses to determine compliance with the HAP limits in Condition D.10.1(d) - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit using the HAP control efficiency, the Permittee shall thereafter maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and

sufficient to establish compliance with the HAP emission limits established in Condition D.10.1(d) - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit.

- (1) The amount and HAP content of each coating material and solvent used. Records may include, for example, inventory records and Material Safety Data Sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use.
 - (3) The single and combined HAP usage for each month.
 - (4) The weight of the single and combined HAPs emitted for each compliance period.
- (d) Condition C.17 - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.10.14 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.10.1- Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Condition C.18 - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.11 FACILITY OPERATION CONDITIONS (SLAG PROCESSING)

Facility Description [326 IAC 2-7-5(15)]:

A Slag Handling Operation owned and operated by Edward C. Levy Company - Butler Mill Service.

- (a) One (1) grizzly feeder with a nominal capacity of 300 tons per hour, permitted in 1994 for construction;
- (b) One (1) 36" conveyor (#9), with a nominal capacity of 350 tons per hour, permitted in 1994 for construction;
- (c) One (1) 30" conveyor (#7), with a nominal capacity of 350 tons per hour, permitted in 1994 for construction;
- (d) Two (2) 5' by 12' Screens, each with a nominal capacity of 350 tons per hour, permitted in 1994 for construction;
- (e) One (1) 24" conveyor (#6), with a nominal capacity of 100 tons per hour, permitted in 1994 for construction;
- (f) One (1) 30" conveyor (#5), with a nominal capacity of 250 tons per hour, permitted in 1994 for construction;
- (g) Three (3) 6' by 16' Screens, each with a nominal capacity of 250 tons per hour, permitted in 1994 for construction;
- (h) One (1) 48" Conveyor (#1), with a nominal capacity of 75 tons per hour, permitted in 1994 for construction;
- (i) One (1) 24" Stacker (#1), with a nominal capacity of 75 tons per hour, permitted in 1994 for construction;
- (j) One (1) 24" Stacker (#2), with a nominal capacity of 125 tons per hour, permitted in 1994 for construction;
- (k) One (1) 24" Conveyor (#12); with a nominal capacity of 40 tons per hour, permitted in 1994 for construction;
- (l) One (1) 24" Stacker (#4), with a nominal capacity of 50 tons per hour, permitted in 1994 for construction;
- (m) One (1) 4 ¼ Standard Crusher, with a nominal capacity of 50 tons per hour, permitted in 1994 for construction;
- (n) One (1) 30" Conveyor (#8), with a nominal capacity of 25 tons per hour; permitted in 1994 for construction;
- (o) Two (2) 30" Conveyors (#10 and #11), with a nominal capacity of 50 tons per hour each, permitted in 2003 for construction;
- (p) One (1) jaw crusher, with a nominal capacity of 100 tons per hour, permitted in 2003 for construction, and
- (q) Aggregate Storage Piles.

Fugitive emissions from the slag handling operations are controlled as needed by water sprays.

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

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

D.11.1 Fugitive Dust Limitations (BACT) [326 IAC 2-2]

- (a) Pursuant to CP 033-3692-00043 issued October 7, 1994, the fugitive dust control plan shall be implemented to reduce emissions from slag processing by at least 95 percent based on a filterable PM10 emission basis.

- (b) Pursuant to CP 033-3692-00043, issued October 7, 1994, the fugitive dust control plan shall be implemented to reduce emissions from storage piles by eighty (80) percent.

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

D.11.2 Record Keeping Requirements

- (a) To document compliance with Condition D.11.1 - Fugitive Dust Limitations (BACT), the Permittee shall maintain records of the times and type of fugitive dust control measures applied to the slag handling and storage piles, as specified in the Fugitive Dust Control Plan.
- (b) Condition C.17- General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.12

FACILITY OPERATIONS CONDITIONS (FUGITIVE DUST)

Facility Description [326 IAC 2-7-5(15)]:

Fugitive Dust Sources consisting of but not limited to the following:

- (a) Paved roads,
- (b) Parking areas,
- (c) Unpaved roads and
- (d) Traveled open areas.

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

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

D.12.1 Fugitive Dust Limitations (BACT) [326 IAC 2-2] [326 IAC 6-5]

Pursuant to CP 033-3692-00043, issued October 7, 1994, the fugitive dust control plan shall be implemented to reduce emissions from the paved roads, parking lots, unpaved roads, and traveled open areas by eighty (80%) percent.

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

D.12.2 Record Keeping Requirements

-
- (a) To document compliance with Condition D.12.1 - Fugitive Dust Limitations (BACT), the Permittee shall maintain records of the times and type of fugitive dust control measures (dust suppressants, water sprays and vacuum/sweeping of paved areas) used as specified in the Fugitive Dust Control Plan.
 - (b) Condition C.17 General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.13 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Insignificant Activities

1. Specifically regulated insignificant activities as define in 326 IAC 2-7-1(21): One (1) Temper Mill [326 IAC 6-3-2]
2. Other Insignificant activities
 - (a) Space heaters, process heaters, or boilers using the following fuels:
 - (i) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (ii) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
 - (b) Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) British thermal units per hour except where total capacity of equipment operated by one (1) stationary source as defined by subdivision (38) exceeds two million (2,000,000) British thermal units per hour.
 - (c) Combustion source flame safety purging on startup.
 - (d) Fuel dispensing activities, including the following:
 - (i) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.
 - (ii) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
 - (e) The following VOC and HAP storage containers:
 - (i) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.
 - (ii) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
 - (f) Refractory storage not requiring air pollution control equipment.
 - (g) Equipment used exclusively for filling drums, pails, or other packaging containers with the following: Lubricating oils, Waxes and Greases.
 - (h) Application of: oils; greases; lubricants; and nonvolatile material; as temporary protective coatings.
 - (i) Machining where an aqueous cutting coolant continuously floods the machining interface.
 - (j) Closed loop heating and cooling systems.
 - (k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
 - (l) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPS.

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

Facility Description [326 IAC 2-7-5(15)]:

Insignificant Activities (continued):

- (m) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner or Operator, that is, an on-site sewage treatment facility.
- (n) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.
- (o) Noncontact cooling tower systems with the following: Forced and induced draft cooling tower system not regulated under a NESHAP.
- (p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (q) Heat exchanger cleaning and repair.
- (r) Process vessel degassing and cleaning to prepare for internal repairs.
- (s) Covered conveyors for solid raw material, including the following:
 - (i) Coal or coke conveying of less than or equal to three hundred sixty (360) tons
 - (ii) Limestone conveying of less than or equal to seven thousand two hundred (7,200) tons per day for sources other than mineral processing plants constructed after August 31, 1983.
- (t) Purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (v) Blow down for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (w) Activities associated with emergencies, including the following:
 - (i) On-site fire training approved by the department.
 - (ii) Emergency generators as follows: Gasoline generators not exceeding one hundred ten (110) horsepower and Diesel generators not exceeding one thousand six hundred (1,600) horsepower.
 - (iii) Stationary fire pump engines.
- (x) A laboratory as defined in 326 IAC 2-7-1(21)(D)
- (y) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (z) Cleaners and solvents characterized as follows: Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F).
- (aa) Brazing equipment, cutting torches, soldering equipment, and welding equipment related to manufacturing activities not resulting in emissions of HAPs.

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

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

D.13.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission pound per hour limitation from the temper mill shall be calculated using the following equation:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

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

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance and Enforcement Branch
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Steel Dynamics, Inc. - Flat Roll Division
Source Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043

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

Please check what document is being certified:

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

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

Signature: _____

Printed Name: _____

Title/Position: _____

Phone: _____

Date: _____

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Steel Dynamics, Inc. - Flat Roll Division
Source Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043

This form consists of 2 pages

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), no later than four (4) daytime 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 no later than two (2) 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, HCl, 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: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance and Enforcement Branch
 100 N. Senate Avenue
 Indianapolis, IN 46204-2251
 Phone: 317-233-0178
 Fax: 317-233-6865**

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

Source Name: Steel Dynamics, Inc. - Flat Roll Division
 Source Address: 4500 County Road 59, Butler, IN 46721
 Part 70 Permit No.: T033-8068-00043

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

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

Form completed by: _____

Title/Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

Part 70 Quarterly Report

Source Name: Steel Dynamics, Inc. - Flat Roll Division
Source Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043
Facility: 2-side, 2-coat, coil coating line (paint line)
Parameter: single HAP emission
Limits: 10 tons per 12 consecutive month period with compliance demonstrated on a monthly basis

Quarter _____ YEAR: _____

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

- No deviations occurred in this quarter.
- Deviation/s occurred in this quarter.

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

Part 70 Quarterly Report

Source Name: Steel Dynamics, Inc. - Flat Roll Division
Source Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043
Facility: 2-side, 2-coat, coil coating line (paint line)
Parameter: combination of HAP emissions
Limits: 14.6 tons per 12 consecutive month period with compliance demonstrated on a monthly basis

Quarter _____ YEAR: _____

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

- No deviations occurred in this quarter.
- Deviation/s occurred in this quarter.

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
QUARTERLY REPORT**

Source Name: Steel Dynamics, Inc. - Flat Roll Division
Source Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043
Facility: 2-side, 2-coat, coil coating line (paint line)
Parameter: VOC usage for the coil coating line (paint line)
Limits: 3894 tons per 12 consecutive month period with compliance demonstrated on a monthly basis

Quarter _____ YEAR: _____

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

- No deviations occurred in this quarter.
- Deviation/s occurred in this quarter.

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Fugitive Dust Control Plan

Steel Dynamics, Inc. - Flat Roll Division
4500 County Road 59
Butler, Indiana

Section 1 – Introduction

The following control plan, when implemented, is designed to reduce uncontrolled fugitive dust based on PM10 mass emissions basis from paved roadways and parking lots, unpaved roadways and traveled open areas, storage piles, and slag processing operations.

The plan shall be implemented on a year-round basis until such time as another plan is approved or ordered by the Indiana Department of Environmental Management.

Section 2 – Paved Roads and Parking Lots

Except as provided below, paved roads and parking lots shall be controlled by the use of a vehicular vacuum sweeper or by water application and shall be performed at least once every 14 day period. Upon request of the Assistant Commissioner, Steel Dynamics, Inc. - Flat Roll Division shall sample and provide to IDEM surface material silt content and surface dust loadings in accordance with field and laboratory procedures provided in the document: C. Cowherd, Jr. et. al., Iron and Steel Plant Open Dust Source Fugitive Emission Evaluation, PE-600/2-79-103, U.S. Environmental Protection Agency, *Cincinnati*, OH, May 1979.. IDEM will have the right to specify road segments to be sampled.

The period listed above for cleaning of the paved road segments and parking lots may be extended by one day for each time:

- (a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.
- (b) It is raining at the time of the scheduled cleaning.
- (c) It is below freezing at the time of the scheduled cleaning.

Section 3 – Unpaved Roads

Unpaved maintenance roads outside of the slag processing area shall be treated to control at least 90 percent instantaneous control based on a PM10 mass emission basis. All unpaved roads shall be treated with a commercially produced dust suppressant specifically manufactured for that purpose, and shall be approved in writing, by the Indiana Department of Environmental Management for the use in the State of Indiana as a chemical dust suppressant. As an alternative, Steel Dynamics, Inc. - Flat Roll Division may pave previously unpaved road sections and apply paved road cleaning measures to these newly paved roads at frequencies similar to existing paved roads in the immediate area.

All roads at the slag handling processing facility shall be unpaved and treated by plant personnel with an asphaltic emulsion at a rate of at least 0.16 gallons per square yard, once per month based on average daily 70-80 vehicles of travel.

Asphalt emulsion products (AE-30) or equivalent shall be applied on a frequency of once per month, April through October, unless conditions require frequency to increase or as required

by IDEM or USEPA, to insure fugitive dust control. Snow cover, inclement weather and freezing/thawing shall preclude application November through March.

Equivalent suppressant shall require written approval from IDEM shall be applied at a rate equivalent to 0.16 gallons per square yard. The initial treatment and subsequent treatments shall immediately follow the first application rates and frequencies shall be sufficient to provide at least 85 percent instantaneous control efficiency.

The above dosage may be too high to be absorbed by the road in one step. In this case, application may be done in two or more stages using lower concentrations but with corresponding increase in treatment frequency.

Treating of unpaved road segments may be delayed by one day when:

- (a) 0.1 or more inches of rain have accumulated during the 24-hour period prior to the scheduled treatment.
- (b) Road segments are saturated with water such that chemical dust suppressants cannot be accepted by the surface.
- (c) Road segments are frozen or covered by ice, snow or standing water.
- (d) The road segment or area is closed or abandoned. Abandoned roads will be barricaded.
- (e) It is raining at the time of the scheduled treatment.

Section 4 – Open Aggregate Piles

Open aggregate piles consist of slag in various stages of processing. To maintain product quality and chemical stability, watering the stockpiles shall be the primary means of dust control. Water must be limited as to keep the moisture content of the product within standards.

Wind erosion – When visible emissions exceed 5 percent opacity from any piles, the affected piles shall be sprayed as required by water to eliminate wind erosion. Water added to the product during processing provides added procedures specified in Section 7.

Section 5 – Slag Processing

Emissions from slag processing operations shall be controlled through the application of water. Visible emissions shall not exceed 10% by Method 9, 6-minute average evident from any batch drop, continuous drop, screening or crushing operation.

Section 6 – Material Spill control

Incidents of material spillage leading to visible fugitive dust shall be investigated and properly cleaned up.

Section 7 – Unpaved Roadway and Unpaved Area Opacity Limits

Visible emissions from any unpaved road segment or unpaved area shall not exceed 5 percent opacity as averaged over any consecutive 3-minute period. All visible emission observations shall be determined in accordance with 40 CFR 60 Appendix A Method 9, except as otherwise provided below:

- (a) In viewing fugitive emissions generated by vehicular traffic, the observer shall be positioned in accordance with the provisions of paragraph 2.1 of Method 9 except that the observer need not position himself with his back to the sun.
- (b) The observer shall begin reading when a vehicle crosses his line of sight which shall be approximately perpendicular to the trajectory of that vehicle. The observer shall continue to observe and record visible emission opacities at 15-second intervals along that same line of sight until no less than twelve consecutive opacity readings have been obtained.

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

**Technical Support Document (TSD) for a Part 70 Significant Permit
Modification**

Source Description and Location

Source Name:	Steel Dynamics, Inc. - Flat Roll Division
Source Location:	4500 County Rd 59, Butler, Indiana 46721
County:	DeKalb
SIC Code:	3312
Operation Permit No.:	T 033-8068-00043
Operation Permit Issuance Date:	October 4, 2006
Significant Permit Modification No.:	033-28510-00043
Permit Reviewer:	Kristen Willoughby

Source Definition

The source consists of:

- (a) Steel Dynamics, Inc. - Flat Roll Division (SDI-Flat Roll), located at 4500 County Road 59, Butler, Indiana 46721; and
- (b) Steel Dynamics, Inc. - Iron Dynamics Division (SDI-IDD), located at 4500 County Road 59, Butler, Indiana 46721.

Separate Part 70 permits will be issued to Steel Dynamics, Inc. - Flat Roll Division (033-8068-00043) and Steel Dynamics, Inc. - Iron Dynamics Division (033-12614-00076), solely for administrative purposes. For this permit, the Permittee is Steel Dynamics, Inc. - Flat Roll Division, the primary operation.

Existing Approvals

The source was issued Part 70 Operating Permit No. T033-8068-00043 on October 4, 2006. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Significant Source Modification	033-23028-00043	October 26, 2007
Significant Permit Modification	033-24411-00043	December 19, 2007
Significant Permit Modification	033-27843-00043	July 10, 2009
Significant Permit Modification	033-27843-00043	December 30, 2009

County Attainment Status

The source is located in DeKalb County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, 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.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
 Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards

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. DeKalb 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

DeKalb County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

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

(d) Since this source is classified as an iron and steel mill plant, it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(e) Fugitive Emissions

Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (ton/yr)
PM	Greater than 100
PM ₁₀	Greater than 100
PM _{2.5}	Greater than 100
SO ₂	Greater than 100
VOC	Greater than 100
CO	Greater than 100
NO _x	Greater than 100

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the Technical Support Document for Significant Permit Modification No. 033-24411-00043.

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

HAPs	Potential To Emit (ton/yr)
Single HAP	Less than 10
Total HAP	Less than 25

This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

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

Pollutant	Actual Emissions (ton/yr)
PM	not reported
PM ₁₀	166
SO ₂	225
VOC	106
CO	743
NO _x	1,190
Lead	0.22

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Steel Dynamics, Inc. - Flat Roll Division on September 28, 2009, relating to the revision of several conditions within the Permittee's Title V Operating Permit.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Permit Level Determination – Part 70

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

There is no increase in the potential to emit of any regulated pollutants associated with this modification.

The modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because it does require a significant change to existing monitoring, record keeping and reporting requirements.

Federal Rule Applicability Determination

There is no change in the federal rule applicabilities due to this modification.

State Rule Applicability Determination

There is no change in the state rule applicabilities due to this modification.

Compliance Determination and Monitoring Requirements

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

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

Since there is no new equipment associated with this modification, there are no new compliance determination or monitoring requirements. Existing compliance determination and monitoring requirements have been modified as part of this modification and those changes are detailed in the Proposed Changes section of this document.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T033-8068-00043. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

Upon further review, IDEM, OAQ has made the following changes:

Change 1:

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM is revising all instances of "the responsible official" to read "a responsible official."

Change 2:

IDEM has determined that IC 13-17-12 (Enforcement of Local Air Pollution Control Ordinances) should also be cited in the header of Condition B.4 - Enforceability.

B.4 Enforceability [326 IAC 2-7-7][**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, and the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

Change 3:

IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether the a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 the "responsible official" as defined by 326 IAC 2-7-1(34).~~ 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.

Change 4:

To clarify that Condition B.8 - Certification only states what a certification must be, IDEM has revised the condition.

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

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

- ~~(b) One (1) certification shall be included, using the attached Certification Form or its equivalent, with each submittal requiring certification. One certification may cover multiple forms in one (1) submittal.~~
- (a) A certification required by this permit meets the requirement of 326 IAC 2-7-6(1) if:**
- (i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and**
 - (ii) the certification states that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.**
- (b) The Permittee may use the attached Certification Form or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.**
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

Change 5:

IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether the a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so.

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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 July 1 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
- and
- United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

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

The submittal by the Permittee does require ~~the~~ **a certification that meet the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a “responsible official”** as defined by 326 IAC 2-7-1(34).

Change 6:

IDEM has decided to clarify Section B - Preventive Maintenance Plan.

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

(a) ~~If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain A Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit, including the following information on each facility~~ **meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:**

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than 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 a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (bc) 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 PMP **and their submittal do not require a** ~~does not require the~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).
- (ed) 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.

Change 7:

IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether the a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so. Also, IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-8-4(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.

B.11 Emergency Provisions [326 IAC 2-7-16]

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

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

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

Indiana Department of Environmental Management
Compliance 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 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- ~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "Responsible Official" need only referenced by the date of the original report.~~

Change 8:

IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM has removed Condition B.15 - Deviation from Permit Requirements and Conditions and added the requirements of that condition to Condition C.20 - General Reporting Requirements. Paragraph (d) of Condition C.20 - General Reporting Requirements has been removed because IDEM already states the timeline and certification needs of each report in the condition requiring the report. Subparagraph (g)(4) has been revised to match the underlying rule language.

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

- ~~(a) Deviations from any permit requirements (for emergencies see Section B.11 - 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 46204-2254~~

~~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 do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

Change 9:

IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether the a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so.

~~B.165 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6) (C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]~~

- ~~(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6) (C)] The notification by the Permittee does require ~~the~~ a certification **that meet the requirements of 326 IAC 2-7-6(1)** by the a "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

- ~~(1) That this permit contains a material mistake.~~

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a) (3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
 - (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ 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 2-7-9(c)]

Change 10:

IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether the particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so. Also, the rule citations 326 IAC 2-7-3 (Requirement for a Permit) and 326 IAC 2-7-4 (Permit Application) were added for clarification to Condition B.17 - Permit Renewal.

B.176 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7 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, **pursuant to 326 IAC 2-7-4(a)(2)(D)**, in writing by IDEM, OAQ any additional information identified as being needed to process the application.

Change 11:

IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether the a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so.

B.187 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
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 **does require a certification that meets the requirements of 326 IAC 2-7-6(1)** ~~shall be certified by the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

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

Change 12:

IDEM has decided to state that no notice is required for approved changes in Section B - Permit Revision Under Economic Incentives and Other Programs.

B.198 Permit Revision under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b) (2)]

(a) No Part 70 permit revision **or notice** shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.2019 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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

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

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

Indiana Department of Environmental Management
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 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require ~~the~~ **a certification that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a "responsible official"** as defined by 326 IAC 2-7-1(34).

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

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

Change 13:

IDEM has decided to reference 326 IAC 2 in Section B-Source Modification Requirements, rather than specific construction rule.

~~B.2120~~ Source Modification Requirement [326 IAC 2-7-10.5] ~~[326 IAC 2-2-2]~~

- ~~(a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.~~
- ~~(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.~~

Change 14:

IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether the a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so.

~~B.2322~~ Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a ~~permit revision that allows for~~ 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

Any such application does require a ~~The application which shall be submitted by the Permittee does require the certification~~ **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c) (3)]

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

Change 15:

IDEM, OAQ has revised Condition C.1 - Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour to make it consistent with the language in 326 IAC 6-3-2.

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

- (a) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any **manufacturing** 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.

Change 16:

IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.

C.2 Opacity [326 IAC 5-1]

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

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

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

Change 17:

IDEM has removed the first paragraph of Section C.8 - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.

~~C.9C.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) For performance testing required by this permit, a** 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 61-52 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 a certification **that meets the requirements of 326 IAC 2-7-6(1)** by the a "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification **that meets the requirements of 326 IAC 2-7-6(1)** by the a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, no 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 no later than five (5) days prior to the end of the initial forty-five (45) day period. ~~The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

Change 18:

IDEM has revised Condition C.11 - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been change to clearly indicate that it is the Permittee that must follow the requirements of the condition.

C.44-10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, ~~for all monitoring and record keeping requirements not already legally required, the Permittee shall be allowed up to~~ **implemented no later than ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring after permit issuance.** If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. ~~If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit that equipment cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 a~~ **certification that meets the requirements of 326 IAC 2-7-6(1)** by the a "responsible official" as defined by 326 IAC 2-7-1(34).

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

Change 19:

IDEM has removed Condition C.12 - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.

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

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

Change 20:

IDEM has revised Condition C.16 - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

~~C.4614 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]~~

~~Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation of this permit:~~

- (a) ~~Upon detecting an excursion or exceedance,~~ Tthe Permittee shall **take reasonable response steps** to 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 **excess** 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).~~ **The response** Corrective actions may include, but are **is** not limited to, the following:
- (1) initial inspection and evaluation;
 - (2) recording that operations returned **or are returning** 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 **normal or usual manner of operation** ~~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 **record the reasonable response steps taken.** ~~maintain the following records:~~
- ~~(1) — monitoring data;~~
 - ~~(2) — monitor performance data, if applicable; and~~
 - ~~(3) — corrective actions taken.~~

Change 21:

IDEM has revised Condition C.17 - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Condition C16 - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

C.4715 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a Stack test performed in conformance with Section C.98 - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall ~~take appropriate corrective actions.~~ **submit a description of these corrective its response actions to IDEM, OAQ, no later than thirty (30) seventy-five (75) days after receipt of the date of the test results.** ~~The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.~~
- (b) A retest to demonstrate compliance shall be performed no later than one hundred **eighty (180) twenty (120) days after submission to IDEM, OAQ of the original date of the test results.** Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred **eighty (180) and twenty (120) days** is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do not require ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6][326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11][326 IAC 2-2]

Change 22:

Paragraph (b) of Condition C.18 - Emission Statement has been removed. It was duplicative of the requirement in Condition C.19 - General Reporting Requirements.

C.4816 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit no later than July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

The emission statement does require ~~the~~ a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1(34).

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

Change 23:

The voice of paragraph (b) of Condition C.19 - General Record Keeping Requirements has been change to clearly indicate that it is the Permittee that must follow the requirements of the paragraph. Also, the clean unit and pollution control project provisions of the U.S. EPA's New Source Review Reform Rules were vacated on June 24, 2005 by a United States Court of Appeals for the District of Columbia Circuit decision. This decision also remanded the "reasonable possibility" standard back to U.S. EPA. On January 22, 2008 U.S. EPA promulgated a rule to address the remand, by the U.S. Court of Appeals for the District of Columbia on June 25, 2005, of the reasonable possibility provisions of the December 31, 2002 major NSR reform rule. IDEM has agreed, with U.S. EPA, to interpret "reasonable possibility" in 326 IAC 2-2 and 326 IAC 2-3 consistent with the January 22, 2008 U.S. EPA rule. To implement this interpretation, IDEM is revising Section C - General Record Keeping Requirements and Section C - General Reporting Requirements (original Conditions C.19 and C.20).

C.4917 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

- (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, **for** all record keeping requirements not already legally required, **the Permittee shall be allowed up to ninety (90) days from the date of implemented no later than ninety (90) days after permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.**
- (c) If there is a reasonable possibility **(as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b))** that a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing

emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii) and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) **If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:**
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

Change 24:

IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM has removed Condition B.15. - Deviation from Permit Requirements and Conditions and added the requirements of that condition to Condition C.20 - General Reporting Requirements. Paragraph (d) of Condition C.20 - General Reporting Requirements has been removed because IDEM already states the timeline and certification needs of each report in the condition requiring the report.

C.2018 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (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 **except that 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.** This report shall be submitted no later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall

include ~~the~~ a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1(34). **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.**

- (b) The **address for report submittal is 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 61-523 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 no later than thirty (30) days of the end of the reporting period. All reports that require the certification shall be signed by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- (e) The first report shall cover the period commencing on the date of issuance of this permit **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.
- (f) If the Permittee is required to comply with the recordkeeping provisions of ~~(e)~~ **(d)** in Section C.4917 - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) at an existing emissions unit and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq)), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with ~~(e)(2) and (3)~~ **(d)(1) and (2)** in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee **wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.** ~~deems fit to include in this report,~~

Reports required in this part 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

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

Stratospheric Ozone Protection

Change 25:

IDEM has decided to simplify the referencing in Condition C.21 - Compliance with 40 CFR 82 and 326 IAC 22-1.

C.2419 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 **applicable** 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.~~

Change 26:

326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM is revising all instances of "the responsible official" to read "a responsible official" as shown in the example below.

D.1.2521 Reporting Requirements [40 CFR 60.276a][326 IAC 3-5-7]

- (a) ...
- (b) The reports submitted by the Permittee do require ~~the~~ **a certification that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a "responsible official"** as defined by 326 IAC 2-7-1(34).

Change 27:

For clarity, IDEM, OAQ has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to "Section C ... contains the Permittee's obligations with regard to the records required by this condition" as shown in the example below.

D.1.13 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

~~A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit is required for the EAFs, continuous casters (#1 and #2), EAF dust silo 5c and associated control devices.~~ **Condition B.10 - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.**

Change 28:

IDEM, OAQ has removed the first paragraph of Condition C.9 - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures. Therefore, reference to 326 IAC 3-6 has been added to all Section D testing conditions. Additionally, all section D testing conditions have been revised for clarification purposes.

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

~~Within~~ **Not later than 12 months after the issuance of this Part 70 Permit No. T033-8068-00043 or 30 months from the date of the latest compliance demonstration stack test, whichever is later,** and in order to comply with condition D.4.2 - **Hydrochloric Acid (HCL) Pickling Emission Limitation**, the Permittee shall perform a hydrochloric acid test on the pickle line Stack 17, utilizing methods as approved by the Commissioner **at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).** ~~and in accordance with Condition C.98 - Performance Testing~~ **contains the Permittee's obligation with regard to the performance testing required by this condition.** ~~This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.~~

Change 29:

IDEM has decided to streamline our process by not listing the source mailing address in the permit. We will continue to list the source location.. Therefore, the Permittee's mailing address has been removed throughout the permit.

~~Mailing Address: _____ 4500 County Rd 59, Butler, Indiana 46724~~

The following changes are a result of discussions between the Permittee and IDEM:

- (1) *The Permittee requests all references to "Steel Dynamics, Inc." are revised to "Steel Dynamics, Inc. - Flat Roll Division" and references to "Iron Dynamics Division" are revised to "Steel Dynamics, Inc. - Iron Dynamics Division."*

IDEM agrees to this change. This change has been made throughout the permit as shown in the example below.

Steel Dynamics, Inc. - Flat Roll Division

Steel Dynamics, Inc. - Iron Dynamics Division

- (2) *The Permittee requests, for ease of subsequent changes to the Permit, where specific conditions numbers are referenced, the condition title for the condition number be added to the permit. In addition, where IDEM cross-references a specific condition (in lieu of a general section), such as "Emergency Provision" in Section B, the Permit should be revised to specify the condition. Finally, where IDEM has already made this change specifying a condition number, it should be noted consistently as a "Condition" not a "Section."*

IDEM agrees to this change. This change has been made throughout the permit as shown in the example below.

D.2.1211 Record Keeping Requirements

- (a) To document compliance with Condition D.2.10 - **Visible Emission Notations**, the Permittee shall maintain records of visible emission notations of the LMF Stack 61 exhaust 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 a visible emission notation (e.g. the process did not operate that day).
 - (b) To document compliance with Condition D.2.11 - **Parametric Monitoring**, the Permittee shall maintain records once per day of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
 - (c) ~~All records shall be maintained in accordance with the Section~~ **Condition C.1917 - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.**
- (3) *The Permittee requests the construction dates be removed from the permit and replaced with the dates the units were permitted for construction since many of the construction dates are inaccurate. The Permittee requests the removal of any unnecessary descriptive information and the removal of emission units that were not constructed from the permit*

The following changes have been made in Condition A.3 - Emission Units and Pollution Control Equipment Summary and all Facility Description Boxes:

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

Steel Dynamics, Inc. - Flat Roll Division consists of the following emission units and pollution control devices:

Melt Shop Operations

- (a) Electric Arc Furnaces (EAF)

Two (2) twin shell electric arc furnaces (EAF #1 South, ~~constructed in 1995~~ **permitted in 1994 for construction** and EAF #2 North, ~~constructed in 1998~~ **permitted in 1997 for construction**), each with a nominal capacity of 200 tons per hour, using a direct shell evacuation (DSE) system ("fourth hole" duct), an overhead roof exhaust system consisting of canopy hoods, DSE air gap for carbon monoxide (CO) emissions control, and low-NO_x/oxyfuel burners (combustion control) for nitrogen oxide (NO_x) emissions control. Particulate emissions from EAF #2 North are controlled by EAF Baghouse 2. All emissions from EAF #2 North exhaust to Stack 92 (~~equipped with a COM~~). Particulate emissions from EAF #1 South are controlled by EAF Baghouse 1. All emissions from EAF #1 South exhaust to Stack 01 (~~equipped with a COM~~).
- (b) Continuous Casters

Two (2) continuous casters (CC #1 South, ~~constructed in 1995~~ **permitted in 1994 for construction** and CC #2 North, ~~constructed in 1998~~ **permitted in 1997 for construction**), each with a nominal capacity of 225 tons per hour. Particulate matter (PM/PM10) emissions are controlled by canopy hoods over each caster exhausting to the EAF baghouse through Stack 01.
- (c) Miscellaneous natural gas combustion sources

- (1) One (1) ladle dryout station (LDS), with a nominal heat input of 10 MMBtu per hour, **permitted in 1994 for construction;**
 - (2) Four (4) ladles preheat stations (LPS), with a nominal heat input of 10 MMBtu per hour each, **three (3) permitted in 1994 and one (1) permitted in 1995 for construction;**
 - (3) Three (3) **natural gas fired** tundish ladle dryers with a nominal heat input capacity of 1.5 MMBtu per hour each, **one (1) permitted in 1994 and two (2) permitted in 1995 for construction;**
 - (4) Two (2) **natural gas-fired** tundish preheaters with a nominal heat input capacity of 9.4 MMBtu per hour each, **permitted in 1994 for construction;** and
 - (5) Lancing and cutting of skulls, coils and steel scrap.
- (d) Storage Silos and Bins
- (1) Eleven (11) storage silos including the following:
 - (A) Three (3) EAF dust silos consisting of:
 - (i) Bin vent 5a for particulate matter control ~~constructed in 1995~~ **permitted in 1994 for construction,**
 - (ii) Bin vent 5b for particulate matter control ~~constructed in 1998;~~ **permitted in 1997 for construction** and
 - (iii) Bin vent 5c for particulate matter control, ~~approved for construction in 2007~~ **permitted in 2007 for construction.**
 - (B) Six (6) Lime/carbon silos with bin vents 22 through 27 for particulate matter control, **permitted in 1994 and 1997 for construction,** and
 - (C) Two (2) alloy silos with bin vents 28 and 29 for particulate matter control, **permitted in 1994 for construction.**
 - (2) Enclosed, indoor and/or pneumatic conveying to control fugitive emissions.
- (e) Slag pit digouts associated with each electric arc furnace.
- (f) Melt shop building openings, dust handling system and melt shop roof monitors.

Ladle Metallurgical Stations

Two (2) Ladle Metallurgical Stations (LMS) (South ~~constructed in 1995~~ **permitted in 1994 for construction** and North ~~constructed in 1998~~ **permitted in 1998 for construction**), each with a nominal capacity of 200 tons per hour. Particulate (PM/PM10) emissions are controlled by the Ladle Metallurgical Furnaces (LMF) baghouse (~~constructed in 1998~~ **permitted in 1998 for construction**, with a ~~maximum~~ **nominal** air flow rate of 200,000 standard cubic feet per minute) exhausting through Stack 61. The LMS consists of the following:

- (a) Three (3) Ladle Metallurgical furnaces (LMF), and
- (b) Two (2) stir stations,

Hot Mill Operations - Tunnel Furnaces

- (a) One (1) tunnel furnace, No. 1 South, ~~constructed in 1995~~ **permitted in 1994 for construction**, using low NOx burners, with a nominal heat input capacity of 117.9 MMBtu per hour (nominal 92 MMBtu per hour in the heating zone and nominal 25.9 MMBtu per hour in the holding zone), exhausting through Stack 2.
- (b) One (1) tunnel furnace, No. 2 North, ~~constructed in 1998~~ **permitted in 1997 for construction**, using low NOx burners with a nominal heat input capacity of 92 MMBtu per hour in the heating zone, exhausting through Stack 42.

Cold Mill Operations – Pickling Line

One (1) pickling line, with a nominal capacity of 1.4 million ton per year, ~~constructed in 1997~~ **permitted in 1996 for construction**, with a packed scrubber and covered tanks maintained under negative pressure, for Hydrochloric Acid (HCl) control, and a mist eliminator for PM/PM-10 control, exhausting to Stack 17.

Pickle Line Scale Breaker

One (1) scale breaker, ~~constructed in 1997~~ **permitted in 1996 for construction**, with a nominal capacity of 1.4 million tons per year that removes scale from the rolled steel prior to the pickling process. Particulate (PM/PM10) emissions are controlled by a baghouse with a nominal air flow rate of 10,600 acfm and exhausting to Stack 60.

Pickle Line Boilers

Three (3) natural gas fired boilers Nos. 1, 2 and 3, ~~constructed in 1997~~ **two (2) permitted in 1996 for construction and one (1) permitted in 2006**, equipped with low NOx burners, exhausting to Stacks 15, 16a and 16b. The nominal heat input for each boiler is 20.4 MMBtu per hour and the CP 033-5625-00043, issued August 8, 1996, permitted the heat input per hour for Boilers Nos. 1 and 2 as 11.8 MMBtu per hour each. Boiler No. 3 is a standby boiler. Only two (2) boilers will be utilized at any **given** time.

Reversing Mill

One (1) cold reversing mill, with a nominal capacity of one (1.0) million tons per year, ~~constructed in 1997~~ **permitted in 1996 for construction**, with a mist eliminator for particulate (PM/PM10) emissions control, exhausting to Stack 18.

Galvanizing Lines

- (a) One (1) hot band galvanizing line with a nominal capacity of 400,000 tons of steel per year, ~~constructed in 1997~~ **permitted in 1996 for construction**, heated by a low NOx burner natural gas fired heater with a nominal heat input of 45 MMBtu per hour, exhausting through Stack 19.
- (b) Twenty-four (24), natural gas fired radiant tube heaters **associated with the galvanizing line**, added to the hot band galvanizing line **permitted in 2002 for construction**. Each heater has a nominal heat input of 0.3 MMBtu per hour, exhausting inside the building.
- (c) One (1) cold rolled galvanizing line with a nominal capacity of 300,000 tons of steel per year, ~~constructed in 1997~~ **permitted in 1996 for construction**, heated by a low NOx burner natural gas fired heater with a nominal heat input of 55 MMBtu per hour, exhausting to Stack 19.

Annealing Furnaces

Sixteen (16) low NOx burners, natural gas fired annealing furnaces and forty (40) annealing bases, ~~constructed in 1997~~ **permitted in 1996 for construction**. Each furnace has a nominal heat input of four (4) MMBtu per hour, exhausting through roof pipes 30, 31 and 32.

Paint Line (Coil Coating Line)

- (a) One (1) 2-side, 2-coat coil coating line, ~~constructed in 2003~~ **permitted in 2002 for construction**, using roll coating method, with a nominal capacity of 55,000 pounds per hour of the flat rolled steel, using a 60 MMBtu per hour heat input capacity burner equipped thermal oxidizer to control VOC emissions and exhausting to Stack 78.
- (b) Two (2) curing ovens, ~~constructed in 2003~~ **permitted in 2002 for construction**, with a combined nominal heat input capacity of 16 MMBtu per hour using a 60 MMBtu per hour nominal heat input capacity burner equipped thermal oxidizer to control VOC emissions and exhausting to Stack 78.

Slag Handling Operation

The following slag handling operations are owned and operated by Edward C. Levy Company - Butler Mill Service.

- (a) One (1) grizzly feeder with a nominal capacity of 300 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (b) One (1) 36" conveyor (#9), with a nominal capacity of 350 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (c) One (1) 30" conveyor (#7), with a nominal capacity of 350 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (d) Two (2) 5' by 12' Screens, each with a nominal capacity of 350 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (e) One (1) 24" conveyor (#6), with a nominal capacity of 100 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (f) One (1) 30" conveyor (#5), with a nominal capacity of 250 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (g) Three (3) 6' by 16' Screens, each with a nominal capacity of 250 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (h) One (1) 48" Conveyor (#1), with a nominal capacity of 75 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (i) One (1) 24" Stacker (#1), with a nominal capacity of 75 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (j) One (1) 24" Stacker (#2), with a nominal capacity of 125 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (k) One (1) 24" Conveyor (#12); with a nominal capacity of 40 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (l) One (1) 24" Stacker (#4), with a nominal capacity of 50 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;

- (m) One (1) 4 ¼ Standard Crusher, with a nominal capacity of 50 tons per hour, ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (n) One (1) 30" Conveyor (#8), with a nominal capacity of 25 tons per hour; ~~constructed in 1995~~ **permitted in 1994 for construction**;
- (o) Two (2) 30" Conveyors (#10 and #11), with a nominal capacity of 50 tons per hour each, ~~constructed in 2003~~ **permitted in 2003 for construction**;
- (p) One (1) jaw crusher, with a nominal capacity of 100 tons per hour, ~~constructed in 2003~~ **permitted in 2003 for construction**, and
- (q) Aggregate Storage Piles.

Fugitive emissions from parts of the slag handling operations are controlled as needed by water sprays.

Fugitive Dust Sources

- (a) Paved roads,
- (b) Parking areas,
- (c) Unpaved roads, and
- (d) Traveled open areas.

Acid Regeneration

~~One (1) Pickle Line Acid Regeneration Facility; identified as ARF-1; approved for construction in 2007; exhausting to stack 93; consisting of:~~

- ~~(a) One (1) 21.2 MMBtu/hr natural gas fired boiler;~~
- ~~(b) One (1) water treatment system; and~~
- ~~(c) Emissions controlled by a packed scrubber.~~

- (4) *The Permittee requests the addition of one insignificant activity to the source.*

The following change has been made and the Facility Description Box for Section D.14 updated:

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

Steel Dynamics, Inc. - Flat Roll Division also includes the following insignificant activities:

1. Specifically regulated insignificant activities, which are specifically regulated as defined in 326 IAC 2-7-1(21): One (1) Temper Mill [326 IAC 6-3-2]
2. Other Insignificant Activities
 - (a) Space heaters, process heaters, or boilers using the following fuels:
 - (i) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (ii) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
 - (b) Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) British thermal units per hour except where total capacity of equipment operated by one

- (1) stationary source as defined by subdivision (38) exceeds two million (2,000,000) British thermal units per hour.
- (c) Combustion source flame safety purging on startup.
- (d) Fuel dispensing activities, including the following:
 - (i) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.
 - (ii) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers:
 - (i) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.
 - (ii) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Refractory storage not requiring air pollution control equipment.
- (g) Equipment used exclusively for filling drums, pails, or other packaging containers with the following: Lubricating oils, Waxes and Greases.
- (h) Application of: oils; greases; lubricants; and nonvolatile material; as temporary protective coatings.
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (j) Closed loop heating and cooling systems.
- (k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (l) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPS.
- (m) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner or Operator, that is, an on-site sewage treatment facility.
- (n) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.
- (o) Noncontact cooling tower systems with the following: Forced and induced draft cooling tower system not regulated under a NESHAP.
- (p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (q) Heat exchanger cleaning and repair.
- (r) Process vessel degassing and cleaning to prepare for internal repairs.
- (s) Covered conveyors for solid raw material, including the following:
 - (i) Coal or coke conveying of less than or equal to three hundred sixty (360) tons per day.
 - (ii) Limestone conveying of less than or equal to seven thousand two hundred (7,200) tons per day for sources other than mineral processing plants constructed after August 31, 1983.
- (t) Purging of gas lines and vessels that is related to ~~routing~~ **routine** maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (v) Blow down for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (w) Activities associated with emergencies, including the following:

- (i) On-site fire training approved by the department.
- (ii) Emergency generators as follows: Gasoline generators not exceeding one hundred ten (110) horsepower and Diesel generators not exceeding one thousand six hundred (1,600) horsepower.
- (iii) Stationary fire pump engines.
- (x) A laboratory as defined in 326 IAC 2-7-1(21)(D)
- (y) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (z) Cleaners and solvents characterized as follows: Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F).
- (aa) Brazing equipment, cutting torches, soldering equipment, and welding equipment related to manufacturing activities not resulting in emissions of HAPs.**

(5) *The Permittee requests Condition B.13 - Prior Permits Superseded be revised to clarify that the current Title V Permit contains all applicable requirements from previous permits issued to SDI.*

The following change has been made:

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

Except for the construction authorizations in these permits, all terms and conditions applicable to this source contained in the following permits:

Permit Number	Issuance Date
033-3692-00043	October 7, 1994
033-4997-00043	November 16, 1995
033-5625-00043	August 8, 1996
033-8091-00043	June 25, 1997
033-9187-00043	March 24, 1998
033-9752-00043	August 18, 1998
033-9506-00043	September 1, 1998
033-15186-00043	February 11, 2002
033-15836-00043	December 31, 2002
033-16638-00043	January 21, 2003
033-16981-00043	January 21, 2003
033-23028-00043	October 26, 2007
033-24411-00043	December 19, 2007
033-27843-00043	July 10, 2009
033-28134-00043	December 30, 2009

Issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. Except for the construction authorizations of these permits, these prior permits and all of their terms and conditions are hereby superseded.

- (a) ~~All terms and conditions of permits established prior to T033-8068-00043 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) ~~incorporated as originally stated,~~
 - (2) ~~revised under 326 IAC 2-7-10.5, or~~
 - (3) ~~deleted under 326 IAC 2-7-10.5.~~~~
- (b) ~~Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.~~

- (6) *The Permittee requests Condition C.4 - Incineration be revised to clarify that it does not prohibit the introduction of feedstock material for melting in the electric arc furnace.*

The electric arc furnace is not an incinerator and therefore not regulated under Condition C.4 - Incineration. However, additional clarification language has been added to Condition C.4 - Incineration as follows:

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

The Permittee shall not operate an incinerator ~~or incinerate any waste or refuse~~ except as provided in 326 IAC 4-2 and ~~326 IAC 9-1-2~~ **or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.**

- (7) *The Permittee requests Condition C.6 - Fugitive Particulate Matter Emission Limitations be revised to control emissions as needed instead of saying as specified in the plan submitted on October 7, 1994 in order to allow for plan revisions without permit modifications.*

IDEM has combined the requirements of Condition C.6 - Fugitive Particulate Matter Emission Limitations with Condition D.12.1 - Fugitive Dust Limitations (BACT) which also requires the Permittee to follow their Fugitive Dust Control Plan.

~~C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]~~

~~Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on October 7, 1994 (see Attachment A).~~

- (8) *The Permittee requests Condition C.7 - Stack Height be revised to fix a typographical error.*

The following change has been made:

C.76 Stack Height [326 IAC 1-7]

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

- (9) *The Permittee requests Condition C.14 - Emergency Reduction Plans be revised to show the correct submission date for the emergency reduction plan.*

The condition has been updated to reflect IDEM, OAQ current model language:

C.4412 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee ~~prepared and~~ **shall maintain the most recently** submitted written emergency reduction plans (ERPs) consistent with safe operating procedures ~~on August 21, 1998.~~
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]
- (10) *The Permittee requests Condition D.1.1 – Particulate Matter (PM) Limitations be revised to reflect that the PM limit from 40 CFR 60, Subpart AAa is filterable only.*

The following change has been made:

D.1.1 Particulate Matter (PM) Limitations [40 CFR Part 60, Subpart AAa]

Pursuant to 40 CFR 60, Subpart AAa (Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarbonization Vessels Constructed After August 17, 1983), **filterable** particulate matter emissions from the EAF baghouses, due solely to EAF operations, shall not exceed 0.0052 grains per dry standard cubic feet.

(11) *The Permittee requests the following revisions to Condition D.1.2 - Particulate (PM/PM-10) Limitations - Best Available Control Technology:*

- (a) *Condition D.1.2(a)(1), (a)(2), and (b) - Particulate (PM/PM-10) Limitations - Best Available Control Technology be deleted because they are redundant to the requirements of Condition D.1.5 - Particulate Control - (BACT).*

Condition D.1.2(a)(1), (a)(2), and (b) - Particulate (PM/PM-10) Limitations - Best Available Control Technology is a BACT limit that requires the units be controlled by the control device at all times while Condition D.1.15 - Particulate Control - (BACT) is how the source shows compliance with the limit by being required to operate the control device at all times the unit is in operation. In order to simplify matters IDEM has combined the requirements of Condition D.1.2(a)(1), (a)(2), and (b) - Particulate (PM/PM-10) Limitations - Best Available Control Technology and Condition D.1.5(a), (b), and (c) - Particulate Control - (BACT).

- (b) *The removal of the stack height from Condition D.1.2(a)(1) and (2) - Particulate (PM/PM-10) Limitations - Best Available Control Technology.*

IDEM agrees to this change. However, if the stack height is changed, then a new air quality analysis must be done.

- (c) *Condition D.1.2(c)(2) - Particulate (PM/PM-10) Limitations - Best Available Control Technology be revised to no longer require the lancing/cutting of non mechanically reduced skulls, coils, and scrap to be done inside the steel works building.*

Condition D.1.2(c)(2) - Particulate (PM/PM-10) Limitations - Best Available Control Technology has been revised to still meet the original BACT requirements for control, but allow more flexibility in the location of the lancing/cutting.

D.1.2 Particulate (PM/PM-10) Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to PSD CP 033-8091-00043, issued June 25, 1997, PSD SSM 033-23028-00043 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements):

- (1) The PM/PM10 emissions from EAF #1 South shall be controlled by a direct shell evacuation (DSE) system and canopy hood with 100 percent overall capture exhausted to EAF Baghouse 1 with a minimum 99.85 control efficiency for filterable PM/PM10, discharging through Stack 01 ~~at a height of 125 feet above the ground.~~ A slight negative pressure shall be maintained to draw particulate matter through the DSE duct. **Baghouse 1 shall be operated at all times when the EAF #1 South is in operation.**
- (2) The PM/PM10 emissions from EAF #2 North shall be controlled by a direct shell evacuation (DSE) system and canopy hood with 100 percent overall capture and shall exhaust to EAF Baghouse 2 with a minimum 99.85 control efficiency for filterable PM/PM10, which discharges through Stack 92 ~~at a height of 125 feet above the ground.~~ A slight negative pressure shall be maintained to draw particulate matter through the DSE duct. **Baghouse 2 shall be operated at all times when the EAF #2 North is in operation.**

- (3) The PM/PM10 emissions from EAF #2 North and EAF #1 South shall not exceed the limits in the following table:

Unit (Control)	Filterable PM/PM10 Limits		Filterable and Condensable PM10 Limits	
	(gr/dscf)	(lb/hr)	(gr/dscf)	(lb/hr)
EAF #1 South (EAF Baghouse 1)	0.0018	20.1	0.0052	57.9
EAF #2 North (EAF Baghouse 2)	0.0018	15.3	0.0052	44.3

- (b) Pursuant to CP 033-9187-00043, March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), PM/PM10 emissions from the continuous casters shall be controlled by canopy hoods and exhausted to EAF baghouse 1 and then to Stack 01. **Baghouse 1 shall be operated at all times when the continuous casters are in operation.**
- (c) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD Control Technology Review Requirements), the Permittee shall do the following as needed:
- (1) Mechanically reduce skulls, coils and steel scrap in size.
 - (2) ~~Transport any~~ **Oxygen lancing/cutting of any** skulls, coils and steel scrap not mechanically reduced in size ~~to the steel works~~ **shall be conducted inside a building with adequate capture of emissions by a control system** and ~~oxygen lance/cut under a furnace canopy using the a~~ baghouse to control emissions.
- (d) Pursuant to PSD SSM 033-23028-00076 and 326 IAC 2-2-3 (BACT), the filterable PM/PM10 emissions from EAF dust silo 5c shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf).
- (12) *The Permittee requests the removal of any unnecessary descriptive information from Condition D.1.3 - Nitrogen Oxides (NO_x) Limitations - Best Available Control Technology.*

Descriptive information was removed where possible and the construction permit number was corrected for Condition D.1.3(d) - Nitrogen Oxides (NO_x) Limitations - Best Available Control Technology.

D.1.3 Nitrogen Oxides (NO_x) Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the NO_x emissions from the EAFs using low-NO_x natural gas fired burners shall not exceed 0.51 pounds per ton of steel produced. The total NO_x emissions shall not exceed 204.0 pounds per hour.
- (b) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the Ladle Dryout Station (LDS) shall be limited to the use of natural gas, shall not exceed 10 MMBtu per hour heat input and NO_x emissions shall not exceed 0.10 lbs/MMBtu.
- (c) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the four (4) Ladle Preheat Stations (LPS) shall be limited solely to the use of low-NO_x natural gas-fired burners. The four (4) horizontal preheater stations combined shall not exceed 40 MMBtu per hour heat input and the NO_x emissions shall not exceed 0.14 lbs/MMBtu.

- (d) Pursuant to A ~~033-4997-00043~~ **CP 033-3692-00043**, issued ~~November 16, 1995~~ **October 7, 1994** and 326 IAC 2-2 (PSD -Control Technology Review; Requirements), the three (3) Tundish dryers shall ~~be limited solely to the use of low-NOx natural gas-fired burners.~~ Each burner shall be limited to 1.5 MMBtu per hour heat input and the NOx emissions shall not exceed 0.10 lbs/MMBtu.
- (e) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the two (2) Tundish Preheaters shall ~~be limited solely to the use of low-NOx natural gas-fired burners.~~ Each burner shall not exceed 9.4 MMBtu per hour heat input and the NOx emissions shall not exceed 0.10 lbs/MMBtu.
- (13) *The Permittee requests the pound per ton limit in Condition D.1.14(a) - Sulfur Dioxide (SO₂) Limitations - Best Available Control Technology be revised to be consistent with the original construction permit 033-9187-00043.*

The following change has been made:

D.1.4 Sulfur Dioxide (SO₂) Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), the combined SO₂ emissions from the LMF (Stack 61), EAF #1 South (Stack 01) and EAF #2 North (Stack 92) shall not exceed 0.2θ pounds per ton of steel produced and 80 pounds of SO₂ per hour.
- (b) Pursuant to CP 033-8091-00043, issued June 24, 1997 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), the SO₂ emissions from the EAFs shall be controlled by the use of high quality scrap and monitoring the sulfur content of the coke.
- (14) *The Permittee requests Condition D.1.5 - Carbon Monoxide (CO) Limitations - Best Available Control Technology be revised to remove language redundant with Condition D.1.16 - CO Control - (BACT).*

Condition D.1.5 - Carbon Monoxide (CO) Limitations - Best Available Control Technology is a BACT limit that requires the units be controlled by the control device at all times while Condition D.1.16 - CO Control - (BACT) is how the source shows compliance with the limit by being required to operate the control device at all times the unit is in operation. In order to simplify matters IDEM has combined the requirements of Condition D.1.5 - Carbon Monoxide (CO) Limitations - Best Available Control Technology and Condition D.1.16 - CO Control - (BACT).

D.1.5 Carbon Monoxide (CO) Limitations - Best Available Control Technology [326 IAC 2-2]

- Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD – Control Technology Review; Requirements), the CO emissions from EAFs shall be controlled by an adjustment gap between the EAF direct shell evacuation system (DSE) and the remaining water cooled duct to common baghouse. The CO emissions from each EAF shall not exceed 2.0 pounds per ton of hot steel produced. The total emissions from EAF #1 South (Stack 1) and EAF #2 North (Stack 92) shall not exceed 800 pounds per hour. A slight negative pressure shall be maintained at the gap. **The direct shell evacuation system shall be operated at all times when the EAFs are in operation.**
- (15) *The Permittee requests Condition D.1.6 - Volatile Organic Compounds (VOC) Limitations - Best Available Control Technology be revised for clarification purposes and the requirement to attach the scrap management plan be removed from the condition. Also, rather than setting out a separate condition (D.1.7 – VOC General Reduction Requirements (BACT): New Facilities) which states that the 326 IAC 2-2 BACT requirements satisfy the 326 IAC 8-1-6 VOC BACT requirements, we request that the 326 IAC 8-1-6 citation be added to Condition D.1.6 – Volatile Organic Compounds (VOC) Limitations – Best Available Control Technology.*

The following change has been made:

D.1.6 Volatile Organic Compounds (VOC) Limitations - Best Available Control Technology [326 IAC 2-2][326 IAC 8-1-6]

Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review Requirements):

- (a) ~~Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review Requirements),~~ VOC emissions from EAFs shall be controlled through the **a scrap management program plan attached to this permit. All grades of scrap shall be free of non-ferrous metals, non-metallic, excessive dirt, oil, grease, and tin plate. Heavily oiled scrap such as used engine blocks and machine shop borings shall not be used. The Permittee shall implement the SMP, which shall be in writing and available for inspection. The SMP shall provide at a minimum:**
- (1) **All grades of scrap charged to the furnaces shall not contain excessive non-metallics.**
 - (2) **All grades of scrap shall not contain excessive oil and grease.**
 - (3) **Heavily oiled scrap shall not be used.**
- (b) ~~Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review Requirements),~~ the VOC emissions from the EAFs shall be limited to 0.13 pounds of VOC emissions per ton of steel produced. The total VOC emissions from EAF #1 South (Stack 1) and EAF #2 North (Stack ~~492~~) shall not exceed 52.0 pounds per hour.

~~D.1.7 VOC General Reduction Requirements (BACT): New Facilities [326 IAC 8-1-6]~~

~~Pursuant to 326 IAC 8-1-6, the EAFs Best Available Control Technology (BACT) requirements for 326 IAC 2-2 are equivalent to BACT requirements for this rule.~~

- (16) *The Permittee requests the following revisions to Condition D.1.10 - Visible Emission Limitations - Best Available Control Technology:*
- (a) *Condition D.1.10(b) - Visible Emission Limitations - Best Available Control Technology be revised to match the language in the original construction permit number 033-8091-00043.*
- IDEM agrees to this change.*
- (b) *Condition D.1.10(c) - Visible Emission Limitations - Best Available Control Technology be removed since this operation is indoors.*
- The EAF slag pit dig out operation is controlled by the EAF baghouse which vents outside. Therefore, an opacity limit is appropriate. The EAF Baghouse has a more stringent limit than the EAF slag pit dig out operation. Therefore, compliance with the baghouse's limit satisfies the EAF slag pit dig out operation's limit. Language clarifying this has been added to the permit.*
- (c) *Condition D.1.10(e) - Visible Emission Limitations - Best Available Control Technology be revised to reflect the appropriate venting for the units currently at the source and to match the original BACT.*

IDEM agrees to this change.

D.1.1409 Visible Emission Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), visible emissions from the EAF Baghouse 1 and EAF Baghouse 2 stack exhausts (Stack 1 and Stack 92, respectively) shall not exceed three percent (3%) opacity, based on a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9). This condition will satisfy the NSPS 40 CFR Part 60 Subpart AAa, 40 CFR 60.272a.
- (b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), the fugitive emissions generated ~~at~~ **by** the ~~melt shop~~ **EAFs** shall not exceed three percent (3%) opacity from any building opening as determined by a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9). Three percent (3%) opacity is reflective of 100 percent capture.
- (c) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), the EAF slag pit dig out operation located beneath each furnace shall not exceed five (5%) percent opacity. **Each EAF slag pit dig out operation shall be controlled with the use of its associated EAF's baghouse.**
- (d) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD -Control Technology Review Requirements), visible emissions from the building opening and EAF dust handling system shall not exceed three percent (3%) opacity based on a six-minute average(24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).
- (e) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review Requirements), the carbon and flux additive system conveyors and transfer points shall be enclosed and vented **indoors** ~~through bin vents or shall use a pneumatic conveyance.~~
- (f) Pursuant to PSD SSM 033-23028-00076 and 326 IAC 2-2-3 (BACT), visible emissions of the exhaust from EAF dust silo 5c shall not exceed three percent (3%) opacity, based on a six (6) minute average (24 readings taken in accordance with EPA Method 9, Appendix A).

(17) *The Permittee requests the following revisions to Condition D.1.14 - Testing Requirements:*

- (a) *Please update the language to match IDEM's new model language*
This change will be made.
- (b) *The requirement to test the LMF for SO2 be added to this condition and deleted from Condition D.2.8 - Testing Requirements since it shares an SO2 limit with the EAF #1.*
This change will be made.

D.1.143 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11][40 CFR 60, Subpart AAa]

- (a) ~~Within 180 days after initial startup of EAF Baghouse #2 and in order to demonstrate compliance with Condition D.1.2(a) - Particulate (PM/PM10) Limitations - Best Available Control Technology, the Permittee shall perform PM/PM10 testing on the EAF #1 South and EAF #2 North (Stack 01 and Stack 92) utilizing methods as approved by the Commissioner at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration. and in accordance with Condition C.9 - Performance Testing. PM10 includes filterable and condensable PM10. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.~~

- (b) ~~Within 30 months from the date of the latest compliance demonstration stack test and in~~ order to demonstrate compliance with Conditions D.1.3(a) - **Nitrogen Oxides (NO_x) Limitations - Best Available Control Technology**, the Permittee shall perform NO_x testing on EAF #1 South and EAF #2 North (Stack 01 and Stack 92), utilizing methods as approved by the Commissioner **at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.** ~~and in accordance with Condition C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.~~
- (c) ~~Within 30 months from the date of the latest compliance demonstration stack test and in~~ order to demonstrate compliance with Conditions D.1.4(a) and (b) - **Sulfur Dioxide (SO₂) Limitations - Best Available Control Technology**, the Permittee shall perform simultaneous, SO₂ testing on EAF #1 South, EAF #2 North and the LMF (Stack 01, Stack 92 and LMF Stack 61), utilizing methods as approved by the Commissioner **at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.** ~~and in accordance with Condition C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.~~
- (d) ~~Within 30 months from the date of the latest compliance demonstration stack test and in~~ order to demonstrate compliance with Conditions D.1.5 - **Carbon Monoxide (CO) Limitations - Best Available Control Technology**, the Permittee shall perform CO testing on EAF #1 South and EAF #2 North (Stack 01 and Stack 92) utilizing methods as approved by the Commissioner **at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.** ~~and in accordance with Condition C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.~~
- (e) ~~Within 30 months from the date of the latest compliance demonstration stack test and in~~ order to demonstrate compliance with Conditions D.1.6(b) - **Volatile Organic Compounds (VOC) Limitations - Best Available Control Technology**, the Permittee shall perform VOC testing on EAF #1 South and EAF #2 North (Stack 01 and Stack 92) utilizing methods as approved by the Commissioner **at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.** ~~and in accordance with Condition C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.~~
- (f) ~~Within 180 days after issuance of this Part 70 permit, and in~~ order to demonstrate compliance with Conditions D.1.87 - **Lead Limitations - Best Available Control Technology** and D.1.98 - **Mercury Limitations**, the Permittee shall perform lead and mercury testing on EAF #1 South (Stack 01) and EAF #2 North (Stack 92) utilizing methods as approved by the Commissioner **at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.** ~~and in accordance with Condition C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.~~
- (g) ~~Within 180 days after initial startup of EAF Baghouse #2 and in order to demonstrate~~ compliance with Conditions D.1.8 and D.1.9, the Permittee shall perform lead and mercury testing on EAF #2 North (Stack 92) utilizing methods as approved by the Commissioner **and in accordance with Condition C.9 - Performance Testing.** ~~This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.~~

(g) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Condition C.8 - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

(18) *The Permittee requests Subpart (a) and (b) of Condition D.1.15 - Particulate Control - (BACT) be revised to reflect the deletion of Condition D.1.2(a)(1), (a)(2), and (b) - Particulate (PM/PM-10) Limitations - Best Available Control Technology.*

Instead of deleting Condition D.1.2(a)(1), (a)(2), and (b) - Particulate (PM/PM-10) Limitations - Best Available Control Technology, IDEM combined Condition D.1.15(a) and (b) - Particulate Control - (BACT) into Condition D.1.2(a)(1), (a)(2), and (b) - Particulate (PM/PM-10) Limitations - Best Available Control Technology. Additionally, since Condition D.1.15 - Particulate Control - (BACT) is a compliance determination requirement not a BACT limit, all references to 326 IAC 2-2 (BACT) have been removed from the condition. This change was also made to Condition D.2.9(b) - Particulate Control - (BACT).

~~D.1.156 Particulate Control —(BACT) [326 IAC 2-2]~~

~~(a) Pursuant to 326 IAC 2-2-3, EAF Baghouse 1 shall be operated at all times when EAF #4 South and the continuous casters are in operation.~~

~~(b) Pursuant to 326 IAC 2-2-3, EAF Baghouse 2 shall be operated at all times when EAF #2 North is in operation.~~

~~(ea) Pursuant to 326 IAC 2-2-3, Bin vent filter 5c shall control emissions from EAF dust silo 5c at all times dust is transferred to or from the silo.~~

~~(eb) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~D.2.98 Particulate Control —(BACT) [326 IAC 2-2] [326 IAC 2-7-6(6)]~~

~~(a) Pursuant to 326 IAC 2-2, The LMF baghouse shall be operated at all times when the LMSs and stir stations are in operation.~~

~~(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

(19) *Condition D.1.16 - CO Control - (BACT) has been combined with Condition D.1.5 - Carbon Monoxide (CO) Limitations - Best Available Control Technology as part of the change discussed under (14).*

~~D.1.16 CO Control —(BACT) [326 IAC 2-2]~~

~~The Direct Shell Evacuation System shall be in operation at all times the EAFs are in operation in a manner to control CO emissions.~~

(20) *The Permittee requests the removal of Condition D.1.17 - Visible Emission Observations and Continuous Opacity Monitoring because there are no COMS on these emission units.*

This change will be made.

~~D.1.17 Visible Emission Observations and Continuous Opacity Monitoring [326 IAC 3-5] [40 CFR 60.273a]~~

~~Pursuant to 326 IAC 3-5, and 40 CFR 60.273a, the Permittee shall do the following to demonstrate compliance with Condition D.1.12(a):~~

- ~~(a) The Permittee shall calibrate, maintain, and operate all continuous opacity monitoring systems (COMS) and related equipment required by this permit.~~
 - ~~(b) All COMS shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.~~
 - ~~(c) In the event that a breakdown of a COMS occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.~~
 - ~~(d) Whenever a COM is malfunctioning or is down for maintenance, or repairs for a period of twenty-four (24) hours or more, and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.
 - ~~(1) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of three (3) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.~~
 - ~~(2) Method 9 opacity readings shall be repeated for a minimum of three (3) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.~~
 - ~~(3) Method 9 readings may be discontinued once a COMS is online.~~
 - ~~(4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.~~~~
 - ~~(e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5 and 40 CFR 60.~~
- (21) *The Permittee requests the words "at least" be added to Condition D.1.18(b) - Visible Emission Notations for clarification purposes.*

This change will be made.

~~D.1.18~~**15** Visible Emission Notations

- (a) Pursuant to CP 033-8091-00043, issued June 25, 1997, and PSD SSM 033-23028-00043, visible emission notations of the melt shop building openings, dust handling system, melt shop roof monitors and bin vent filter 5c shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, **at least** 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 Condition C.16~~ **14- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** ~~Failure to take response steps in accordance with Condition C.16 - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

(22) *The Permittee requests Condition D.1.19 - Parametric Monitoring be removed since the source already has to comply a strict 3% opacity standard, visible emission notations, and COMS or a BLDS.*

This change will be made.

D.1.19 Parametric Monitoring

- (a) ~~The Permittee shall record the pressure drop across the baghouses used in conjunction with the EAFs at least once per day when the respective EAFs are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 to 10.0 inches of water or a range established during the latest Stack test, the Permittee shall take reasonable response steps in accordance with Section C.16 - 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.16 - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~
- (b) ~~The instrument used for determining the pressure shall comply with Section C.13 - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.~~

(23) *The Permittee requests Condition D.1.22 - Broken or Failed Bag Detection be removed since the Source does not have a single compartment baghouse for the EAFs.*

This change will be made.

D.1.22 Broken or Failed Bag Detection

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

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

(24) *The Permittee requests the following revisions to Condition D.1.23 - Record Keeping Requirements:*

- (a) *The word demonstrate changed to determine in Subpart (a).*
- IDEM believes the appropriate phrase for record keeping is "To document the compliance status with the Condition" and has made this change throughout the permit.*
- (b) *Eliminate the record keeping requirement for natural gas usage as approved in the April 26, 2007 Joint Stay Agreement.*
- This change will be made.*
- (c) *The deletion of Subpart (b) in accordance with the removal of Condition D.1.17 - Visible Emission Observations and Continuous Opacity Monitoring.*
- This change will be made.*
- (d) *The deletion of Subpart (d) in accordance with the removal of Condition D.1.19 - Parametric Monitoring.*
- This change will be made.*

D.1.2318 Record Keeping Requirements

- (a) To ~~demonstrate~~ **document the compliance status** with the Conditions ~~D.1.2 through D.1.12~~ **D.1.3 - Nitrogen Oxides (NO_x) Limitations - Best Available Control Technology, D.1.4 - Sulfur Dioxide (SO₂) Limitations - Best Available Control Technology, D.1.5 - Carbon Monoxide (CO) Limitations - Best Available Control Technology, D.1.6(b) - Volatile Organic Compounds (VOC) Limitations - Best Available Control Technology**, and the Permittee shall ~~maintain~~ records of the metal throughput, ~~natural gas usage and opacity emission records~~ for the melt shop EAF operations.
- ~~(b) To document compliance with operation Condition D.1.17, the Permittee shall maintain records:~~
- ~~(1) required under 326 IAC 3-5-6 at the source in a manner so that they may be inspected by the IDEM, OAQ, or the U.S. EPA, if so requested or required.~~
- ~~(2) of visible emission readings at the melt shop stacks and make available upon request to IDEM, OAQ, and the U.S. EPA.~~
- (eb) To document compliance with Conditions **D.1.409 - Visible Emission Limitations - Best Available Control Technology** and **D.1.4815 - Visible Emissions Notations**, the Permittee shall maintain records of visible emission notations required by Condition **D.1.4815 - Visible Emissions Notations**. 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).
- ~~(d) To document compliance with Condition D.1.19, the Permittee shall maintain records of the pressure drop readings required by that condition. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).~~
- (ec) ~~All records shall be maintained in accordance with Section~~ **Condition C.1917 - General Record Keeping Requirements**, ~~of this permit~~ **contains the Permittee's obligations with regard to the records required by this condition.**
- (25) *The Permittee requests Condition D.1.25(a) - Reporting Requirements be revised for clarification purposes.*

This change will be made.

D.1.2520 Reporting Requirements [40 CFR 60.276a][326 IAC 3-5-7]

- (a) **The If the Permittee elects to operate a COMs under Condition D.1.16 - New Source Performance Standards - Emission Monitoring, then the Permittee shall submit to IDEM, OAQ a quarterly excess emissions report, if applicable, based on the continuous opacity monitor (COM) data, pursuant to 326 IAC 3-5-7. These reports shall be submitted no later than thirty (30) calendar days following the end of each calendar quarter **being reported.** and in accordance with Section **Condition C.2018 - General Reporting Requirements of this permit contains the Permittee's obligation with regard to the reporting required by this condition.****
- (b) The reports submitted by the Permittee do require ~~the~~ **a certification that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1(34).

(26) *The Permittee requests the following revisions to Condition D.1.23 – National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities:*

- (a) *The removal of the citation 40 CFR 63.10681(b) because it is only applicable if the source needs additional time to comply and the Permittee does not need the extra time.*

This change will be made.

- (b) *The removal of the citation 40 CFR 63.10690 because it is duplicative to reference it requirement in both Condition D.1.21 - General Provisions Relating to National Emission Standards for Hazardous Air Pollutants Under 40 CFR Part 63 and Condition D.1.22 - National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities.*

This change will be made.

- (c) *The removal of the citation 40 CFR 63.10691 because this condition is for the permitting authority, not the source.*

This change will be made.

D.1.22 National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities [40 CFR Part 63, Subpart YYYYYY]

The Permittee shall comply with the following provisions of 40 CFR 63, Subpart YYYYYY (included as Attachment A):

- (1) 40 CFR 63.10680(a), (b)(1), (c) and (d)
(2) 40 CFR 63.10681(a) ~~and (b)~~
(3) 40 CFR 63.10685(a), (b)(1), (b)(2)(i)(iv), (c)(1), and (c)(2)
(4) 40 CFR 63.10686(a), (b), (d)(1) – (d)(4), (d)(6), (e)
~~(5) 40 CFR 63.10690~~
~~(6) 40 CFR 63.10691~~
(7) 40 CFR 63.10692
(8) Table 1 to 40 CFR 63, Subpart YYYYYY

- (27) *The Permittee requests Condition D.2.1 - Particulate (PM/PM10) Limitations - Best Available Control Technology be revised to clarify that the PM/PM-10 limitations are limited to filterable particulate matter. BACT limits for similar units established around the same time as the issuance of CP 033-9187-00043 included filterable PM10 only. Moreover, BACT limits established in permits issued after CP 033-9187-00043 which included filterable PM10 established higher limits in order to account for the condensible portion.*

This change will be made.

D.2.1 Particulate (PM/PM-10) Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), PM/PM-10 emissions from the ladle metallurgical stations (LMS) and stir stations shall be captured by a side draft hood and exhausted to the LMF baghouse to Stack 61.
- (b) Pursuant to CP 033-9187-00043, March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), PM/PM-10 **filterable** emissions from the LMF Stack 61 shall not exceed 0.0032 grains per dry standard cubic foot and 5.49 pounds of PM/PM-10 per hour.
- (28) *The Permittee requests the deletion of Condition D.2.3 - Sulfur Dioxide (SO₂) Limitations - Best Available Control Technology since it is duplicative of Condition D.1.4(a) - Sulfur Dioxide (SO₂) Limitations - Best Available Control Technology.*

This change will be made.

~~D.2.3 Sulfur Dioxide (SO₂) Limitations - Best Available Control Technology [326 IAC 2-2]~~

- ~~Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the SO₂ emissions from the LMF Stack 61 and the existing EAFs Stack 01 (permitted in CP 033-8091-00043), combined shall not exceed 0.2 pounds per ton of steel produced and 80 pounds of SO₂ per hour.~~
- (29) *The Permittee requests Condition D.2.5 - VOC Emission Limitations - Best Available Control Technology be revised to be consistent with revised BACT language from SPM No. 033-27112-00076.*

This change will be made.

D.2.54 VOC Minor Limitations [326 IAC 2-2]

- Pursuant to CP 033-9187-00043, issued March 24, 1998, and Significant Permit Modification No. 033-28134-00043, VOC emissions from the LMF Stack 61 shall not exceed 0.0082 pounds per ton. ~~At a maximum process throughput of 400 tons per hour, this limit is equivalent to and~~ 3.28 pounds of VOC per hour.
- Compliance with these emission limits will ensure that the VOC emissions from CP 033-9187-00043 are less than forty (40) tons per year and therefore will render the requirements of 326 IAC 2-2 not applicable to CP 033-9187-00043 for VOC.
- (30) *The Permittee requests that Condition D.2.6(b) - Visible Emission Limitations - Best Available Control Technology be removed because the condition is impractical since the capture hood is located within the building and is part of the furnace. It is not a canopy hood or a roof monitor type device. In addition, emissions inside the LMF exhaust through the caster canopy hoods into the EAF baghouse.*

This change will be made.

D.2.65 Visible Emission Limitations - Best Available Control Technology [326 IAC 2-2]

- ~~(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), visible emissions from the LMF baghouse Stack 61 shall not exceed three percent (3%) opacity based on a six-minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).~~
- ~~(b) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), visible emissions escaping the capture hood for the LMF shall be minimized by operating the fan associated with the LMF baghouse according to manufacturer specifications such that the capture efficiency of the hood is maximized.~~

(31) *The Permittee requests the following revisions to Condition D.2.8 - Testing Requirements:*

- (a) *Subpart (b) be combined with Condition D.1.14(a) - Testing Requirements.*

IDEM agrees to this change.

- (b) *The language be updated to match the most recent model.*

This change will be made.

D.2.87 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (a) ~~Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Condition D.2.1- **Particulate (PM/PM-10) Limitations – Best Available Control Technology**, the Permittee shall perform PM/PM10 testing on the LMF Stack 61 utilizing methods as approved by the Commissioner **at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration** in accordance with Section C.9- Performance Testing. This test shall be repeated at least once every two and one half (2.5) years from the date of this valid compliance demonstration.~~
- (b) ~~Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Condition D.2.2 - **Nitrogen Oxide (NOx) Limitations - Best Available Control Technology**, the Permittee shall perform NOx testing on the LMF Stack 61 utilizing methods as approved by the Commissioner **at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.** and in accordance with Condition C.9 - Performance Testing. This test shall be repeated at least once every two and one half (2.5) years from the date of this valid compliance demonstration.~~
- (e) ~~Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Condition D.2.3, the Permittee shall perform simultaneous, SO2 testing on the EAF Stack 01 and LMF Stack 61, utilizing methods as approved by the Commissioner. and in accordance with Condition C.9 - Performance Testing. This test shall be repeated at least once every two and one half (2.5) years from the date of this valid compliance demonstration.~~
- (ec) ~~Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Conditions D.2.4 - **Carbon Monoxide (CO) Limitations - Best Available Control Technology**, the Permittee shall perform CO testing on the LMF Stack 61 utilizing methods as approved by the Commissioner **at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.** and in accordance with Condition C.9 - Performance Testing. This test shall be repeated at least once every two and one half (2.5) years from the date of this valid compliance demonstration.~~

(ed) ~~Within~~ **Not later than** twelve (12) months after issuance of Significant Permit Modification No. 033-28134-00043 **and in order to demonstrate compliance with Condition D.2.4 – VOC Minor Limitations**, the Permittee shall perform VOC testing on the LMF Stack 61, utilizing testing methods approved by the Commissioner. ~~The test shall be repeated at least once every two and one-half (2.5) years from the date of the most recent valid compliance demonstration. and in accordance with Condition C.9 – Performance Testing.~~

(e) **Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Condition C.8 - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.**

(32) *The Permittee has requested Condition D.2.10(b) - Visible Emission Notations be revised to add the words "at least" to Subpart (b) for clarification purposes.*

This change will be made.

D.2.409 Visible Emission Notations

- (a) Pursuant to CP 033-9187-00043, issued March 24, 1998, visible emission notations of the LMF Baghouse Stack 61 exhaust, shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, **at least** 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 Condition C.1614- Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** ~~Failure to take response steps in accordance with Condition C.16- Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

(33) *The Permittee requests the pressure drop range be revised in Condition D.2.11 - Parametric Monitoring to reflect the normal range established in the stack test performed on February 22, 2008.*

This change will be made.

D.2.4110 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with the LMF at least once per day when the LMF is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of **2.0** ~~4.0~~ to 10.0 inches of water or a range established during the latest Stack test, the Permittee shall take reasonable response steps. ~~in accordance with Section C.1614- Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** 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.16- Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~

The instrument used for determining the pressure shall comply with ~~Section~~ **Condition C.4311** - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated **or replaced** at least once every six (6) months **or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer specifications, if used.**

- (34) *The Permittee requests the removal of the phrase "once per day" from Condition D.2.12 – Record Keeping Requirements because Conditions D.2.10 – Visible Emission Notations and D.2.11 – Parametric Monitoring already provide the frequency.*

This change will be made.

D.2.12 Record Keeping Requirements

- (a) To document **the compliance status** with Condition D.2.9 - **Visible Emission Notations**, the Permittee shall maintain records of visible emission notations of the LMF Stack 61 exhaust ~~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 a visible emission notation (e.g. the process did not operate that day).
- (b) To document **the compliance status** with Condition D.2.10 - **Parametric Monitoring**, the Permittee shall maintain records ~~once per day~~ of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) ~~All records shall be maintained in accordance with~~ Condition C.4917 - General Record Keeping Requirements **contains the Permittee's obligations with regard to the records required by this condition.**
- (35) *he Permittee requests the removal of the MMBtu per hour heat input limits and the addition of a lb/hr limit to Condition D.3.1(a) - Nitrogen Oxides (NOx) Limitations - Best Available Control Technology.*

This change will be made.

D.3.1 Nitrogen Oxides (NOx) Limitations - Best Available Control Technology [326 IAC 2-2]

- (a) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), Tunnel Furnace No. 1 shall be ~~limited to solely to the use of equipped with~~ low NOx natural gas fired burners ~~and shall not exceed 117.9 MMBtu per hour heat input~~ and NOx emissions shall not exceed 0.17 pounds per MMBtu. **The total emissions per hour shall not exceed 20.0 pounds per hour through Stack 2.**
- (b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), Tunnel Furnace No. 2 heating zone shall be equipped with low NOx natural gas fired burners ~~not exceeding 92 MMBtu per hour heat input~~ and NOx emissions shall not exceed 0.10 pounds per MMBtu. The total emissions per hour shall not exceed 9.2 pounds per hour through Stack 42.
- (36) *The Permittee requests Condition D.4.1 - Particulate Matter Emissions Limitations - Best Available Control Technology (BACT) be revised to clarify that the PM limitations are limited to filterable particulate matter.*

This change will be made. Additionally, IDEM has combined the requirements of Condition D.4.5 - Particulate Control (BACT) into this condition.

D.4.1 Particulate Matter Emissions Limitations - Best Available Control Technology (BACT)[326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the pickle line particulate matter emissions shall be controlled by a scrubber ~~Stack~~ and the **filterable** particulate matter emissions from Stack 17 shall not exceed 1.23 pounds per hour. **The scrubber shall be operated at all times when the pickle line is in operation.**

- (37) *The Permittee requests Condition D.4.2 - Hydrochloric Acid (HCL) Pickling Emission Limitation revised for clarification purposes..*

IDEM has combined the requirements of Condition D.4.5 - Particulate Control (BACT) into this condition and revised the title and rule cite of the condition for clarification purposes. The rule citation for 40 CFR 63, Subpart CCC was added to show that this limit keeps the source from being subject to the NESHAP for Steel Pickling – HCL Process Facilities and Hydrochloric Acid Regeneration Plants.

D.4.2 Hydrochloric Acid (HCl) Pickling **HAP Minor** Emission Limitation [40 CFR 63, Subpart CCC]

Pursuant to CP 033-5625-00043, issued August 8, 1996, the hydrochloric acid mist from the pickle line shall be controlled by a scrubber and mist eliminator. Emissions shall not exceed 0.32 pounds per hour. **The scrubber and mist eliminator shall be operated at all times when the pickle line is in operation.**

- (38) *The Permittee has requested that Condition D.4.4 - Testing Requirements be revised to "not later than 12 months after the original issuance of this Part 70 permit or ... whichever is later" to match the twelve-month timeframe approved by IDEM in the April 26, 2007 Joint Stay Agreement.*

This change will be made.

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

~~Within 30 months from the date of the latest compliance demonstration stack test and in order to comply with condition D.4.2 - **Hydrochloric Acid (HCL) Pickling HAP Minor Emission Limitation**, the Permittee shall perform a hydrochloric acid test on the pickle line Stack 17, utilizing methods as approved by the Commissioner **at least once five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).** and in accordance with Condition C.98 - Performance Testing **contains the Permittee's obligation with regard to the performance testing required by this condition.** This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.~~

- (39) *The Permittee requested Condition D.4.5 - Particulate Control (BACT) be revised to remove text as follows to remove confusing and unnecessary reference:*

D.4.5 Particulate Control (BACT) [326 IAC 2-2] and HCl Emissions Control

~~The pickling line scrubber and mist eliminator shall be in operation at all times the pickling line is in operation to control particulate matter and HCl emissions.~~

Condition D.4.5 - Particulate Control (BACT) has been combined with Conditions D.4.1 - Particulate Matter Emissions Limitations - Best Available Control Technology (BACT) and D.4.2 - Hydrochloric Acid (HCL) Pickling HAP Minor Emission Limitation for clarification purposes.

~~D.4.5 Particulate Control (BACT) [326 IAC 2-2] and HCl Emissions Control~~

~~The pickling line scrubber and mist eliminator shall be in operation at all times the pickling line is in operation to control particulate matter and HCl emissions.~~

- (40) *The Permittee requests Condition D.4.7 - Scrubber Failure Detection be revised to clarify when a failed scrubber must be shut down as follows:*

D.4.7 Scrubber Failure Detection

In the event, a scrubber failure has been observed:

~~Failed units~~ **The failed scrubber** and the associated process will be shut down immediately **as soon as practicable** until the failed ~~units have~~ **scrubber has** been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (~~Section~~ **Condition B.11- Emergency Provisions**), or if safety concerns prevent immediate shutdown. If safety concerns prevent immediate shutdown, then feed to the associated process will be shut off immediately and the process shall be shutdown as soon as shutdown would be considered safe.

IDEM feels that the phrase "as soon as practicable" has too much room for interpretation and has instead rewritten the condition to incorporate scenarios IDEM believes are appropriate for continuous and batch processes.

D.4.7 Scrubber Failure Detection

In the event, a scrubber failure has been observed:

~~Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B.11- Emergency Provisions), or if safety concerns prevent immediate shutdown. If safety concerns prevent immediate shutdown, then feed to the associated process will be shut off immediately and the process shall be shutdown as soon as shutdown would be considered safe.~~

- (a) **For a scrubber controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Condition B.11 - Emergency Provisions).**
- (b) **For a scrubber controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Condition B.11 - Emergency Provisions).**
- (41) *The Permittee requests the revision of Condition D.4.8 - Record Keeping Requirements because visible emission notations are not required for this unit.*

The visible emission notation record keeping requirement will be removed.

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.6 - **Parametric Monitoring**, the Permittee shall maintain records of the once per day pickle line scrubber flow rate during normal operation. The Permittee shall include in its daily record when a flow rate reading is not taken and the reason for the lack of a flow rate reading (e.g. the process did not operate that day).
- (b) ~~To document compliance with Condition D.4.7, the Permittee shall maintain records of the once per day visible emission notations. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that day).~~

- (eb) ~~All records shall be maintained in accordance with Section C.1917 - General Record Keeping Requirements~~ **contains the Permittee's obligations with regard to the records required by this condition,** ~~of this permit.~~

- (42) *The Permittee requests the following revisions to Condition D.5.3 - Particulate Control (BACT) because there is no need to specify the reason for operation of the baghouse.*

D.5.3 Particulate Control (BACT) [326 IAC 2-2]

~~The scale breaker baghouse shall be in operation at all times the scale breaker is in operation to control particulate emissions.~~

This change will be made. Additionally, since Condition D.5.3 - Particulate Control - (BACT) is a compliance determination requirement not a BACT limit, all references to 326 IAC 2-2 (BACT) have been removed from the condition.

D.5.3 Particulate Control (BACT) [326 IAC 2-2]

~~The scale breaker baghouse shall be in operation at all times the scale breaker is in operation to control particulate emissions.~~

- (43) *The Permittee has requested Condition D.5.4(b) - Visible Emission Notations be revised to add the words "at least" to Subpart (b) for clarification purposes.*

This change will be made.

D.5.4 Visible Emission Notations

- (a) Visible emission notations of the pickle line scale breaker Stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, **at least** 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 Condition C.1614- Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** ~~Failure to take response steps in accordance with Condition C.16- Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

- (44) *The Permittee requests the removal of Condition D.5.5 - Parametric Monitoring because pressure drop readings and calibration requirements are unnecessary and unduly burdensome for a scale breaker with very low emissions.*

This change will be made.

D.5.5 Parametric Monitoring

- (a) ~~The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the pickle line scale breaker, at least once per day when the pickle line scale breaker is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest Stack test, the Permittee shall take~~

~~reasonable response steps in accordance with Section C.16 - 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.16 - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

~~(b) The instrument used for determining the flow rate shall comply with Section C.13 - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.~~

(45) *The Permittee requests Condition D.5.6 - Record Keeping Requirements be updated in accordance with other requests.*

This condition has been changed as follows:

D.5.65 Record Keeping Requirements

(a) To document compliance with Condition D.5.4 - **Visible Emission Notations**, the Permittee shall maintain records of the once per day visible emission notations. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that day).

~~(b) To document compliance with Condition D.5.5, the Permittee shall maintain records of the pressure drop once per day during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).~~

(c) ~~All records shall be maintained in accordance with Section Condition C.1917 - General Record Keeping Requirements~~ **contains the Permittee's obligations with regard to the records required by this condition,** of this permit.

(46) *The Permittee requests Condition D.6.1 - Particulate Emission Limitations be revised to remove the heat input limits because the Indirect Heating Rule does not limit heat input. Also, the Permittee requests the removal of the requirement to only run two or the three boilers at a time since that requirement is in Condition D.6.2(b) - Nitrogen Oxides (NOx) Limitations - Best Available Control Technology.*

While 326 IAC 6-2-4 does not limit combined heat input, it does use it to calculate the limit to which the units are subject. Therefore, IDEM has corrected the combined heat input and particulate emission limit. The requirement to only run two boilers at a time will be moved to a new Condition D.6.0 and removed Conditions D.6.1 - Particulate Emission Limitations and D.6.2(b) - Nitrogen Oxides (NOx) Limitations - Best Available Control Technology.

D.6.0 Particulate Emission Limitations [326 AC 6-2-4] and Nitrogen Oxides (NOx) Limitations - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) and 326 IAC 2-2 (BACT), only two of the three boilers Nos. 1, 2 and 3, shall be utilized at any time.

D.6.1 Particulate Emission Limitations [326 IAC 6-2-4]

~~Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions shall not exceed 0.48~~ **0.42** pound per MMBtu heat input from ~~only two of three~~ **the** pickle line boilers ~~Nos. 1, 2 and No. 3 used at any time~~ with a combined heat input of ~~23.6~~ **40.8** MMBtu per hour.

D.6.2 Nitrogen Oxides (NOx) Limitations - Best Available Control Technology (BACT) [326 IAC 2-2]

- ~~(a)~~ Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the pickle line boilers shall not exceed 81 pounds per million cubic feet (MMCF) of gas burned.
- ~~(b)~~ Pursuant to 326 IAC 2-2 (BACT), only two of the three boilers Nos. 1, 2 and 3, shall be utilized at any time.

- (47) *The Permittee requests Condition D.7.1 - Particulate Matter Emissions Limitations - Best Available Control Technology (BACT) be revised to clarify that the PM limitations are limited to filterable particulate matter.*

This change will be made.

D.7.1 Particulate Matter Emissions - Best Available Control Technology (BACT)[326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the **filterable** particulate matter emissions from the cold reversing mill shall be controlled by a mist eliminator. Particulate matter emissions from Stack 18 shall not exceed 7.2 pounds per hour.

- (48) *The Permittee requests the following revisions to Condition D.5.3 - Particulate Control (BACT) because there is no need to specify the reason for operation of the baghouse.*

D.7.2 Particulate Control (BACT) [326 IAC 2-2]

~~The reversing mill mist eliminator shall be in operation at all times the reversing mill is in operation to control particulate emissions.~~

This change will be made. Additionally, since Condition D.7.2 - Particulate Control - (BACT) is a compliance determination requirement not a BACT limit, all references to 326 IAC 2-2 (BACT) have been removed from the condition.

D.7.2 Particulate Control (BACT) [326 IAC 2-2]

~~The reversing mill mist eliminator shall be in operation at all times the reversing mill is in operation to control particulate emissions.~~

- (49) *The Permittee requests Condition D.10.1 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) be revised to:*

- (a) *Remove the phrase "with compliance demonstrated at the end of each month from subpart (c) because it is already in subpart (a).*

IDEM, OAQ will leave this phrase in subpart (c) and instead remove it from subpart (a) since subpart (c) covers subparts (a) and (b).

- (b) *Add the issuance date to subpart (d) for clarification purposes.*

This change will be made.

- (c) *Remove reference to the acid regeneration facility from the last paragraph since it was not constructed.*

This change will be made.

D.10.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) **Minor Limit** [326 IAC 2-2][40 CFR Subpart SSSS]

Pursuant to SSM 033-15836-00043, issued December 31, 2002 and 326 IAC 2-2 (Prevention of Significant Deterioration) to maintain the minor status for this modification, the VOC emissions shall be limited as follows:

- (a) For the 2-side, 2-coat, coil-coating line the input of VOC shall be limited to less than 3894 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. This VOC usage limitation in conjunction with the operation of thermal oxidizer at 99% overall control efficiency limits VOC emissions from the coil coating line to less than 38.94 tons per twelve (12) consecutive month period, ~~with compliance demonstrated at the end of each month.~~
- (b) The combined heat input rate for the two curing ovens shall not exceed 16 million Btu per hour and that for the thermal oxidizer shall not exceed 60 million Btu per hour. This limits the VOC emissions from the curing ovens to less than 0.02 tons per twelve (12) consecutive month period.
- (c) The items (a) and (b) combined, limits the VOC emissions from the 2-side, 2-coat coil coating line modification to less than 40 tons per 12 consecutive months period, with compliance demonstrated at the end of each month. This limit pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) makes this modification minor under this rule.
- (d) Pursuant to PSD SSM 033-23028-00043, **issued October 26, 2007**:
 - (1) The single HAP emissions from the coil coating line shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
 - (2) The combined HAP emissions from the coil coating line shall be limited to less than 14.6 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
 - (3) The thermal oxidizer for the coil coating line shall be in operation whenever the coating line is in operation.

Compliance with these limits and requirements, in conjunction with HAP limits on ~~the SDI - IDD's~~ rotary hearth furnace, ~~and SDI - Flat Roll Division's~~ pickle line ~~and acid regeneration facility~~, limits the source-wide PTE of a single HAP and a combination of HAPs to less than ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively, and renders the requirements of 40 CFR Part 63, Subpart SSSS not applicable.

(50) *The Permittee requests Condition D.10.6 - Permanent Total Enclosure be revised to:*

- (a) *Add the issuance date for clarification purposes.*

This change will be made.

- (b) *Remove the testing requirement from subpart (b) because it is redundant of D.10.8 - Testing Requirement.*

This change will be made. Additionally, since Condition D.10.6 – Permanent Total Enclosure is a compliance determination requirement not a BACT limit, all references to 326 IAC 2-2 have been removed from the condition.

- (c) *Add the word “or” between options (a) and (b) to clarify that the Permittee can either follow Method 204 or use another method acceptable to IDEM to confirm 100% capture.*

This change will be made.

D.10.6 Permanent Total Enclosure [326 IAC 2-2]

~~Pursuant to SSM 033-15836-00043, issued December 21, 2002, PSD SSM 033-23028-00043 and 326 IAC 2-2 (Prevention of Significant Deterioration)~~ **In order** to maintain the minor status for the 2-side, 2-coat, coil coating line, the Permittee shall use a permanent total enclosure:

- (a) The capture system for the 2-side, 2-coat, coil coating line shall meet the criteria for a Permanent Total Enclosure as described in 40 CFR 51, Method 204. ~~The Permanent Total Enclosure will meet the testing requirements in condition D.10.8(c).~~

-or-

- (b) Verify 100% capture through other methods as approved by the Commissioner.

- (51) *The Permittee requests Condition D.10.7 - Thermal Oxidizer - Best Available Control Technology (BACT) have its title and rule cite revised to cite the correct rule.*

Since Condition D.10.7 – Thermal Oxidizer – Best Available Control Technology (BACT) is a compliance determination requirement not a BACT limit, all references to 326 IAC 2-2 (BACT) have been removed from the condition.

D.10.7 Thermal Oxidizer - ~~Best Available Control Technology (BACT)~~ [326 IAC 2-2]

The thermal oxidizer shall operate with a control efficiency of not less than 99% at all times that the 2-side, 2-coat, coil coating line is in operation. This efficiency is necessary to ensure compliance with conditions D.10.1 - **Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit**, D.10.2 - **Volatile Organic Compounds (VOC)**, and D.10.4 - **Metal Coil Surface Coating NSPS**.

- (52) *The Permittee requests some typographical errors be corrected in Condition D.10.8(d)(1)(A) - Testing Requirements.*

This change will be made.

D.10.8 Testing Requirements [326 IAC 12, 40 CFR 60.463]

- (a) The Permittee shall conduct a performance test for each calendar month for each affected facility according to the procedures under condition D.10.8(c), (d), (e), and (f).
- (b) 40 CFR 60.8(d) and (f) do not apply to the performance test.
- (c) The Permittee shall determine the overall reduction efficiency (R) for the capture system and the control device to determine compliance with condition D.10.4(b).

The Permittee may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c) (1), (2), and (3) of this section, shall be repeated when directed by the Administrator, IDEM, OAQ or when the Permittee elects to operate the control device or capture system at conditions different from the initial performance test.

- (1) Determine the fraction (F) of total VOC's emitted by an affected facility that enters the control device using the following equation:

$$F = \frac{\sum_{i=1}^l C_{bi} Q_{bi}}{\sum_{i=1}^l C_{bi} Q_{bi} + \sum_{i=1}^p C_{fi} Q_{fi}}$$

Where:

- C_b = the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon).
- Q_b = the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour).
- C_{fi} = the VOC concentration in each gas stream emitted directly to the atmosphere (parts per million by volume, as carbon).
- Q_{fi} = the volumetric flow rate of each gas stream emitted directly
- l = the number of gas streams entering the control device, and
- p = the number of gas streams emitted directly to the atmosphere.

- (2) Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation:

$$E = \frac{\sum_{i=1}^n C_{bi} Q_{bi} - \sum_{i=1}^m C_a Q_a}{\sum_{i=1}^n C_{bi} Q_{bi}}$$

Where:

- C_a = the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million by volume, as carbon).
- Q_a = the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour).
- n = the number of gas streams entering the control device, and
- m = the number of gas streams leaving the control device and entering the atmosphere.

The Permittee shall construct the VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in § 60.466.

- (3) Determine overall reduction efficiency (R) using the following equation:

$$R = EF$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as specified in sections (d) and (e) below.

- (d) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility as follows:

- (1) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied (G) during each calendar month for each affected facility, except as provided under paragraph (c)(1)(iv) of 40 CFR 60.463 as follows:

- (A) Calculate the mass of VOC's used ($M_o + M_d$) during each calendar month for each affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj}$$

Where:

- M_o = Mass of VOC's in coatings consumed, as received in kilogram (kg)
- M_d = Mass of VOC-solvent added to the coatings, in kg
- L_c = the volume of each coating consumed, as received in liters
- L_d = the volume of each VOC-solvent added to the coatings in liters (l)
- W_o = the proportion of VOC's in each coating, as received (fraction by weight)
- D_d = density of each VOC-solvent added to the coatings (kg/l)
- $\sum L_{dj} D_{dj}$ = will be 0 if no VOC solvent is added to the coatings, as received
- n = the number of different coatings used during calendar-month, and
- m = the number of different VOC solvents added to coatings used during the calendar month.

- (A) Calculate the total volume of coating solids used (L_s) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^n V_{si} L_{ci}$$

Where

- V_s = the proportion of solids in each coating, as received (fraction by volume).
- L_c = the volume of each coating consumed, as received in liters
- L_s = total volume of solids used in a calendar month
- n = the number of different coatings used during the calendar month.

- (e) Calculate the volume-weighted average mass of VOC's used per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s}$$

- (ef) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$$N = G (1-R)$$

- (fg) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

(53) *The Permittee requests Condition D.10.9 - Testing Requirements be revised to:*

- (a) *The testing date requirement in (b), (c), (d), (e), and (f) be changed to "not later than 12 months after the original issuance of this Part 70 permit or ... whichever is later" to match the twelve-month timeframe approved by IDEM in the April 26, 2007 Joint Stay Agreement.*

This change will be made.

- (b) *Remove the "minimum operating temperature and fan amperage or duct pressure" testing requirements, since monitoring for them is not contained in the NSPS, Subpart TT. Given that the NSPS monitoring requirements were created with careful consideration of appropriate monitoring, there is no need for IDEM to add additional monitoring requirements.*

IDEM reserves the right to include more stringent monitoring than required by the NSPS. The fan amperage and duct pressure show that the fan is on and operating properly to ensure the VOC/HAP emissions are pulled into the duct work towards the RTO for destruction. The minimum operating temperature will be removed.

D.10.9 Testing Requirements [326 IAC 3-6] [326 IAC 2-7-6(1), (6)]

- (a) ~~Within 30 months from the date of the latest compliance demonstration stack test and in~~ order to demonstrate compliance with Conditions D.10.1- **Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit** and D.10.2 - **Volatile Organic Compounds (VOC)**, the Permittee shall perform VOC emissions and thermal oxidizer control efficiency testing utilizing methods as approved by the Commissioner. ~~This testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. and in accordance with Condition C.9 - Performance Testing.~~
- (b) The Permittee shall determine the hourly average temperature, ~~minimum operating temperature~~ and duct pressure or fan amperage for the thermal oxidizer from the most recent valid ~~s~~Stack test that demonstrates compliance with the limits in conditions D.10.1 - **Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit** and D.10.2 - **Volatile Organic Compounds (VOC)** as approved by IDEM.
- (c) In order to demonstrate compliance with Condition D.10.1(d) - **Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit**, within 180 days of the end of the month in which it is determined that VOC emissions equal or exceed nine (9) tons for any twelve (12) consecutive month period, the Permittee shall perform inlet and outlet HAP testing on the thermal oxidizer controlling emissions from the coil coating line (Step #1). Testing shall be done utilizing Method 18 or other methods approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM or using an estimation method approved by IDEM. If the VOC emissions equal or exceed nine (9) tons for any twelve (12) consecutive month period more than once in a period of 4.5 years, then a subsequent test shall be conducted within 5 years from the date of the last valid compliance demonstration (Step #2). If within 4.5 years after the second valid compliance demonstration the VOC emissions do not equal or exceed nine (9) tons for any twelve (12) consecutive month period, then the Permittee is not required to repeat inlet and outlet HAP testing until the VOC emissions equal or exceed nine (9) tons for any twelve (12) consecutive month period at which time the Permittee shall repeat Step #1. If within 4.5 years after the second valid compliance demonstration the VOC emissions equal or exceed nine (9) tons for any twelve (12) consecutive month period, then the Permittee shall repeat Step #2.

- (d) **Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).** ~~Testing shall be conducted in accordance with Section Condition C.98 - Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.~~

- (54) *The Permittee requests the removal of any reference to the capture efficiency from Condition D.10.10 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) because Condition D.10.6 - Permanent Total Enclosure requires 100% capture.*

Condition D.10.10(b) – Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) will be revised to be similar to Condition D.10.10(a) - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP).

D.10.10 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Pursuant to SSM 033-15836-00043, issued December 1, 2002, and PSD SSM 033-23028-00043:

- (a) Compliance with Condition D.10.1 - **Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit** shall be demonstrated at the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at **the** VOC emission rate for 12 consecutive months period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

$$\text{VOC emitted} = [(\text{VOC input}) \times (100 - \text{Overall control efficiency of thermal oxidizer})] + [\text{uncontrolled VOC}]$$

Where VOC input is based on the formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

- (b) If VOC emissions from the 2-side, 2-coat coil line exceed nine (9) tons for any twelve consecutive month period, or the Permittee chooses to demonstrate compliance with Condition D.10.1(d) - **Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit** using the HAP control efficiency, the Permittee shall determine the single and combination HAP emissions for each month using the following methodology:

$$\text{HAP emitted} = [(\text{HAP usage input}) \times (100 - \text{Overall control efficiency of thermal oxidizer} - (\text{DE} \times \text{CE}))] + [\text{uncontrolled HAP}]$$

Where:

HAP input is based on the formulation data supplied by the coating manufacturer.

~~DE = Destruction efficiency of the oxidizer determined by the latest stack test using Method 18~~

~~CE = Capture efficiency determined by the latest stack test~~

Until the initial Method 18 stack test is performed, an overall control efficiency of 99% shall be used in ~~place of the (DE x CE) quantity in the equation above.~~

- (55) *The Permittee requests the following revisions to Condition D.10.13 - Record Keeping Requirements:*

- (a) *The word "shall" be replaced with "may" in subpart (a)(2) to identify what records may be kept to comply with the condition's requirements.*

This change will be made.

- (b) *Subpart (c) be deleted because this requirement may be redundant to the record keeping requirement of subpart (a)(4).*

Subpart (c) documents compliance with Condition D.10.11 - Thermal Oxidizer while subpart (a)(4) documents compliance with Condition D.10.1 - Volatile Organic Compounds. These requirements have been combined into one new requirement in subpart (b)(1).

D.10.13 Record Keeping Requirements

- (a) To document **the compliance status** with Condition D.10.1 - **Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit**, the Permittee shall maintain records in accordance with (1) through ~~(5)~~**(3)** below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.10.1 - **Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit**.
- (1) The VOC content of each coating material and solvent used less water.
- (2) The amount of coating material and solvent used on a monthly basis.
- ~~(A)~~ Records ~~shall~~ **may** include, **for example**, purchase orders, invoices, and material safety data sheets (MSDS) or any other information necessary to verify the type and amount used.
- (3) The total VOC usage for each month.
- (b) **To document the compliance status with Conditions D.10.1 - Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit and D.10.11- Thermal Oxidizer, the Permittee shall maintain records in accordance with (1) through (2) below.**
- (41) The continuous temperature records (on a three hour average basis) for the thermal oxidizer and the average temperature used to demonstrate compliance during the most recent compliant sStack test. The Permittee shall include in its continuous record when a temperature is not taken and the reason for the lack of a temperature recording (e.g. the process was not in operation).
- ~~(52)~~ Daily records of the duct pressure or fan amperage. The Permittee shall include in its daily record when a pressure or amperage reading is not taken and the reason for the lack of pressure or amperage reading (e.g. the process did not operate that day).
- ~~(b)~~ If VOC emissions from the 2-side, 2-coat coil coating line equal or exceed nine (9) tons for any twelve (12) consecutive month period, or the Permittee chooses to determine compliance with the HAP limits in Condition D.10.1(d) - **Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit** using the HAP control efficiency, the Permittee shall thereafter maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.10.1(d) - **Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit**.

- (1) The amount and HAP content of each coating material and solvent used. Records shall **may** include, **for example**, inventory records and Material Safety Data Sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use.
 - (3) The single and combined HAP usage for each month.
 - (4) The weight of the single and combined HAPs emitted for each compliance period.
 - ~~(c) To document compliance with Condition D.10.11, the Permittee shall maintain a log of the thermal oxidizer temperature.~~
 - (d) ~~All records shall be maintained in accordance with Section Condition C.4917 - General Record Keeping Requirements~~ **contains the Permittee's obligations with regard to the records required by this condition,** ~~of this permit.~~
- (56) *The Permittee requests the word document be changed to determine in Condition D.10.14 - Reporting Requirements.*

IDEM believes the appropriate phrase for record keeping is "To document the compliance status with the Condition" and has made this change throughout the permit.

D.10.14 Reporting Requirements

A quarterly summary of the information to document **the compliance status** with Condition D.10.1- **Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) Minor Limit** shall be submitted to the address listed in Section C.20 - ~~General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. **Condition C.2018 - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition.** The report submitted by the Permittee does require ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

- (57) *The Permittee requests the following changes be made to Condition D.11.1 - Fugitive Dust Limitations:*
- (a) *The phrase fugitive dust program changed to fugitive dust control plan.*
This change will be made.
 - (b) *Subpart (a) be revised as follows for clarification purposes:*
 - (a) Pursuant to CP 033-3692-00043 issued October 7, 1994, the **fugitive dust control plan shall be implemented as needed to reduce emissions from** slag processing ~~emissions shall be reduced~~ by at least 95 percent based on a PM10 emission basis.

The fugitive dust control plan should be implemented at all times as part of BACT. However, the requirements spelled out in the fugitive dust control plan may specify how often they need to be performed. Therefore, this change will be made without the words "as needed."
 - (c) *The Permittee requests Subpart (a) be revised to clarify that the PM-10 limitations are limited to filterable particulate matter. BACT limits for similar units established around the same time as the issuance of CP 033-9187-00043 included filterable PM10 only.*

This change will be made.

(d) Subpart (b) be revised as follows for clarification purposes:

- (b) Pursuant to CP 033-3692-00043, issued October 7, 1994, the fugitive dust **control plan program** shall be implemented **as needed** to reduce emissions from storage piles by eighty (80) percent.

The fugitive dust control plan should be implemented at all times as part of BACT. However, the requirements spelled out in the fugitive dust control plan may specify how often they need to be performed. Therefore, this change will be made without the words "as needed."

D.11.1 Fugitive Dust Limitations (BACT) [326 IAC 2-2]

- (a) Pursuant to CP 033-3692-00043 issued October 7, 1994, the **fugitive dust control plan shall be implemented to reduce emissions from** slag processing emissions shall be reduced by at least 95 percent based on a **filterable** PM10 emission basis.
- (b) Pursuant to CP 033-3692-00043, issued October 7, 1994, the fugitive dust **control plan program** shall be implemented to reduce emissions from storage piles by eighty (80) percent.

(58) *The Permittee requests Condition D.11.2 - Particulate Control (BACT) be deleted because it is duplicative in that the requirements are already present in Condition D.11.1 - Fugitive Dust Limitations (BACT).*

This change will be made.

D.11.2 Particulate Control (BACT) [326 IAC 2-2]

~~The water sprays to control fugitive particulate emissions from the slag handling operations shall be in operation as necessary to control particulate emissions.~~

(59) *The Permittee requests Condition D.11.3 – Fugitive Dust Control (BACT) be deleted because it is duplicative in that the requirements are already present in Condition D.11.1 - Fugitive Dust Limitations (BACT).*

This change will be made.

D.11.3 Fugitive Dust Control (BACT) [326 IAC 2-2]

~~The fugitive dust plan shall be implemented as needed to control fugitive dust emissions from the slag handling operation and storage piles.~~

(60) *The Permittee requests Condition D.11.2 - Particulate Control (BACT) be deleted because it is duplicative in that the fugitive dust control plan called for in Condition D.11.1 - Fugitive Dust Limitations (BACT) already contains these requirements.*

IDEM agrees the Record Keeping Requirement is duplicative. IDEM believes it needs to be maintained as an enforceable condition in the permit. Therefore, it will be removed from the Fugitive Dust Control Plan.

D.11.42 Record Keeping Requirements

- (a) To document compliance with Condition D.11.1 - **Fugitive Dust Limitations (BACT)**, the Permittee shall maintain records of the times and type of fugitive dust control measures applied to the slag handling and storage piles, as specified in the Fugitive **D**ust **C**ontrol **P**lan.

- (b) ~~All records shall be maintained in accordance with Section~~ **Condition C.4917 - General Record Keeping Requirements** **contains the Permittee's obligations with regard to the records required by this condition,** ~~of this permit.~~

(61) *The Permittee requests the following changes to Condition D.12.1 - Fugitive Dust Limitations (BACT):*

- (a) *The phrase fugitive dust program changed to fugitive dust control plan.*

This change will be made.

- (b) *The Permittee requested Condition C.6 - Fugitive Particulate Matter Emission Limitations be revised to control emissions as needed instead of saying as specified in the plan submitted on October 7, 1994 in order to allow for plan revisions without permit modifications.*

IDEM instead combined the requirements of Condition C.6 - Fugitive Particulate Matter Emission Limitations with Condition D.12.1 - Fugitive Dust Limitations (BACT) which also requires the Permittee to follow their Fugitive Dust Control Plan.

D.12.1 Fugitive Dust Limitations (BACT) [326 IAC 2-2] [326 IAC 6-5]

Pursuant to CP 033-3692-00043, issued October 7, 1994, the fugitive dust **control plan program** shall be implemented to reduce emissions from the paved roads, parking lots, unpaved roads, and traveled open areas by eighty (80%) percent.

(62) *The Permittee requests the removal of Condition D.12.2 - Fugitive Dust Control (BACT) because it is duplicative of Condition D.12.1 - Fugitive Dust Limitations (BACT).*

This change will be made.

~~**D.12.2 Fugitive Dust Control (BACT) [326 IAC 2-2]**~~

~~The fugitive dust plan which includes control measures (dust suppressant, water sprays and the vacuum/sweeping of paved roads) shall be implemented as needed to control fugitive dust emissions from the paved roads, parking lots, unpaved roads and traveled open areas.~~

(63) *The Permittee requests the removal of Condition D.12.3 - Record Keeping Requirements because the fugitive dust control program called for in Condition D.12.1 - Fugitive Dust Limitations (BACT) already contains this condition.*

IDEM agrees the Record Keeping Requirement is duplicative. IDEM believes it needs to be maintained as an enforceable condition in the permit. Therefore, it will be removed from the Fugitive Dust Control Plan.

~~**D.12.32 Record Keeping Requirements**~~

- (a) To document compliance with Condition D.12.1 - **Fugitive Dust Limitations (BACT)**, the Permittee shall maintain records of the times and type of fugitive dust control measures (dust suppressants, water sprays and vacuum/sweeping of paved areas) used as specified in the Fugitive ~~D~~ **ust Control P**lan.

- (b) ~~All records shall be maintained in accordance with Section~~ **Condition C.4917 - General Record Keeping Requirements** **contains the Permittee's obligations with regard to the records required by this condition,** ~~of this permit.~~

(64) *The Permittee requests the removal of Section D.13 because the Acid Regeneration facility was never constructed.*

This change will be made.

SECTION D.13 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Acid Regeneration

One (1) Pickle Line Acid Regeneration Facility; identified as ARF-1; approved for construction in 2007; exhausting to stack 93; consisting of:

- (a) One (1) 21.2 MMBtu/hr natural gas fired boiler;
- (b) One (1) water treatment system; and
- (c) Emissions controlled by a scrubber.

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

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

D.13.1 PM/PM10 Limitations – Best Available Control Technology [326 IAC 2-2-3]

Pursuant to 326 IAC 2-2-3 (PSD – BACT):

- (a) A scrubber shall control PM/PM10 emissions from the Pickle Line Acid Regeneration Facility.
- (b) PM emissions from the Pickle Line Acid Regeneration Facility shall not exceed 0.022 grains per dry standard cubic foot (gr/dscf) and 2.5 pounds per hour (lb/hr).
- (c) PM10 emissions from the Pickle Line Acid Regeneration Facility shall not exceed 0.022 grains per dry standard cubic foot (gr/dscf) and 2.5 pounds per hour (lb/hr).
- (d) Visible emissions of the exhaust from the Pickle Line Acid Regeneration Facility shall not exceed five percent (5%) opacity, as determined by a six (6) minute average (24 readings taken in accordance with EPA Method 9, Appendix A).

Compliance with these limitations satisfies the requirements of 326 IAC 2-2-3.

D.13.2 HAP Emissions [40 CFR Part 63, Subpart CCC][40 CFR Part 63, Subpart EEEE] [326 IAC 20]

The HCl emissions from the Pickle Line Acid Regeneration Facility shall not exceed 0.74 pounds per hour. Compliance with this limit in conjunction with the other HAP limitations on SDI's EAFs, IDI's RHF, and SDI's coating line will limit the source-wide potential to emit HCl to less than 10 tons per year and the potential to emit any combination of HAPs to less than 25 tons per year, and render the requirements of 40 CFR Part 63, Subparts CCC and EEEE not applicable.

D.13.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.13.4 Particulate and HCl Control

Except as otherwise provided by statute, rule, or in this permit, and in order to comply with Conditions D.13.1 and D.13.2, the scrubber, used to control PM/PM10 and HCl emissions, shall be in operation at all times the Pickle Line Acid Regeneration Facility is in operation.

~~D.13.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]~~

- ~~(a) Within 180 days after initial start up, the Permittee shall perform PM/PM_{4.0} and opacity testing on the stack emissions from the Pickle Line Acid Regeneration Facility in order to demonstrate compliance with Condition D.13.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM_{4.0} includes filterable and condensable PM_{4.0}. Testing shall be completed using methods approved by the Commissioner and conducted in accordance with Condition C.9 - Performance Testing.~~
- ~~(b) Within 180 days after initial start up, the Permittee shall perform HCl testing on the stack emissions from the Pickle Line Acid Regeneration Facility in order to demonstrate compliance with Condition D.13.2. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be completed using methods approved by the Commissioner and conducted in accordance with Condition C.9 - Performance Testing.~~

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

~~D.13.6 Scrubber Monitoring~~

- ~~(a) The Permittee shall monitor the recirculation pump discharge pressure and scrubbant flow rate at least once per day when the scrubber is in operation.~~
- ~~(b) When for any one reading, the recirculation pump discharge pressure is outside the normal range as specified by the manufacturer, 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. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~
- ~~(c) When for any one reading, the scrubbant flow rate is less than a minimum specified by the manufacturer or established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~
- ~~(d) The instrument used for determining the pressure or flow rate 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.~~

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

~~D.13.7 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.13.5, the Permittee shall maintain records of the results from the tests required by that condition.~~
- ~~(b) To document compliance with Condition D.13.6, the Permittee shall maintain records of the required scrubber operating parameters required by that condition. The Permittee shall include in its daily record when a discharge pressure or flow rate reading is not taken and the reason for the lack of a reading (e.g. the process did not operate that day).~~
- ~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

(65) *The Permittee requests Condition D.14.1 be revised as follows:*

D.14.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission pound per hour limitation from the temper mill shall be calculated using the following equation:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour;} \\ \text{and } P = \text{process weight rate in tons per hour}$$

This change will be made.

~~D.14.113.1~~ Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission pound per hour limitation from the temper mill shall be calculated using the following equation:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour;} \\ \text{and } P = \text{process weight rate in tons per hour}$$

- (66) *The Permittee requests the last line of the Part 70 Operating Permit Emergency Occurrence Report be revised for clarification purposes.*

IDEM, OAQ has decided to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already address this issue.

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Steel Dynamics, Inc. - Flat Roll Division
Source Address: 4500 County Road 59, Butler, IN 46721
Mailing Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043

...

Form Completed by: _____

Title/Position: _____

Date: _____

Phone: _____

~~A certification is not required for this report.~~

- (67) *The Permittee requests the following revisions to the Part 70 Operating Permit Quarterly Deviation and Compliance Monitoring Report:*

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance and Enforcement Branch
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Steel Dynamics, Inc. - Flat Roll Division
Source Address: 4500 County Road 59, Butler, IN 46721
Mailing Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043

Page 1 of 2

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

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

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

Form completed by: _____

Title/Position: _____

Date: _____

Phone: _____

~~Attach a signed certification to complete this report.~~

The phrase "of this permit" will be added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule. However, the number of deviations, duration of deviation, and information about the individual who filled out the form are necessary pieces of information for the Compliance and Enforcement Branch.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance and Enforcement Branch
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Steel Dynamics, Inc. - Flat Roll Division
Source Address: 4500 County Road 59, Butler, IN 46721
Mailing Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements **of this permit**, 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".

...

(68) *The Permittee requests the Compliance and Enforcement Branch's address be to the Part 70 Quarterly Forms:*

This change will be made.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

Part 70 Quarterly Report

...

(69) *The Permittee requests the removal of all reports referencing Edward C. Levy Company Butler Mill Service (Levy). Since Levy is under the Permittee's permit, the Permittee will certify compliance with applicable conditions.*

This change will be made.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Edward C. Levy Company - Butler Mill Service
Source Address: 4500 County Road 59, Butler, IN 46721
Mailing Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043

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

Please check what document is being certified:

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

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

Signature: _____

Printed Name: _____

Title/Position: _____

Phone: _____

Date: _____

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: _____ Edward C. Levy Company - Butler Mill Service
Source Address: _____ 4500 County Road 59, Butler, IN 46721 _____
Mailing Address: _____ 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: _____ T033-8068-00043

This form consists of 2 pages

- ~~This is an emergency as defined in 326 IAC 2-7-1(12)~~
- ~~The Permittee must notify the Office of Air Quality (OAQ), no later than four (4) daytime 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 no later than two (2) 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? <u>Y</u> <u>N</u> Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, HCl, 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
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: _____ Edward C. Levy Company - Butler Mill Service
Source Address: _____ 4500 County Road 59, Butler, IN 46721
Mailing Address: _____ 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: _____ T033-8068-00043

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

<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form completed by: _____

Title/Position: _____

Date: _____

Phone: _____

~~Attach a signed certification to complete this report.~~

(70) *The Permittee requests their Fugitive Dust Control Plan be revised as follows:*

Fugitive Dust Control Plan

Steel Dynamics, Inc. - Flat Roll Division
~~DeKalb County Roads 44 and 59~~
4500 County Road 59
Butler, Indiana

Section 1 – Introduction

The following control plan, when implemented, is designed to reduce uncontrolled fugitive dust based on PM₁₀ mass emissions basis from paved roadways and parking lots ~~by at least 50 percent and down to 16.8 pounds of silt per mile, unpaved roadways and traveled open areas, by at least 90 percent instantaneous control and storage piles, and slag processing operations by 97 percent.~~

The plan shall be implemented on a year-round basis until such time as another plan is approved or ordered by the Indiana Department of Environmental Management.

~~The name of the person, his/her title, and telephone number on site who is responsible for implementing the plan shall be supplied to the OAM Compliance Section.~~

Section 2 – Paved Roads and Parking Lots

Except as provided below, Paved roads and parking lots shall be controlled by the use of a vehicular vacuum sweeper **or by water application** and shall be performed **at least once** every 14 days **period**. Upon request of the Assistant Commissioner, Steel Dynamics, Inc. - Flat Roll Division shall sample and provide to IDEM surface material silt content and surface dust loadings in accordance with field and laboratory procedures ~~given~~ **provided in reference to the document: C. Cowherd, Jr. et. al., Iron and Steel Plant Open Dust Source Fugitive Emission Evaluation, PE-600/2-79-103, U.S. Environmental Protection Agency, Cincinnati, OH, May 1979.** IDEM will have the right to specify road segments to be sampled. ~~Steel Dynamics, Inc. - Flat Roll Division shall provide supplemental cleaning of paved road sections found to exceed the controlled silt surface loading of 16.8 pounds of silt per mile.~~

~~The period listed above for c~~**The period listed above for cleaning** of the paved road segments and parking lots may be ~~delayed~~ **extended** by one day ~~when~~ **for each time:**

- (a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.
- ~~(b) The road segment is closed or abandoned. Abandoned roads will be barricaded to prevent vehicle access.~~
- (eb) It is raining at the time of the scheduled cleaning.
- (c) It is below freezing at the time of the scheduled cleaning.**

Section 3 – Unpaved Roads

~~Unpaved maintenance roads outside of the slag processing area shall be treated to control at least 90 percent instantaneous control based on a PM10 mass emission basis. All unpaved roads shall be treated with a commercially produced dust suppressant specifically manufactured for that purpose, and shall be approved in writing, by the Indiana Department of Environmental Management for the use in the State of Indiana as a chemical dust suppressant. As an alternative, Steel Dynamics, Inc. – Flat Roll Division may pave previously unpaved road sections and apply paved road cleaning measures to these newly pave roads at frequencies similar to existing paved roads in the immediate area.~~

~~All roads at the slag handling processing facility shall be unpaved and treated by plant personnel with an asphaltic emulsion at a rate of at least 0.16 gallons per square yard, once per month based on average daily 70-80 vehicles of travel.~~

~~Asphalt emulsion Road dust control products (AE-30 or equivalent) shall be applied on a frequency of once per month, April through October, unless conditions require frequency to increase or as required by IDEM or USEPA, to ensure fugitive dust control. Snow cover, inclement weather and freezing/thawing shall preclude application November through March.~~

~~Equivalent suppressant shall require written approval from IDEM shall be applied at a rate equivalent to 0.16 gallons per square yard. The initial treatment and subsequent treatments shall immediately follow the first application rates and frequencies shall be sufficient to provide at least 85 percent instantaneous control efficiency.~~

~~The above dosage may be too high to be absorbed by the road in one step. In this case, application may be done in two or more stages using lower concentrations but with corresponding increase in treatment frequency.~~

~~Treating of unpaved road segments may be delayed by one day when:~~

- ~~(a) 0.1 or more inches of rain have accumulated during the 24-hour period prior to the scheduled treatment.~~
- ~~(b) Road segments are saturated with water such that chemical dust suppressants cannot be accepted by the surface.~~
- ~~(c) Road segments are frozen or covered by ice, snow or standing water.~~
- ~~(d) The road segment or area is closed or abandoned. Abandoned roads will be barricaded.~~
- ~~(e) It is raining at the time of the scheduled treatment.~~

~~The period listed above for treating of unpaved road segments may be extended by one day for each time:~~

- ~~(a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.~~
- ~~(b) It is raining at the time of scheduled cleaning.~~
- ~~(c) It is below freezing at the time of the scheduled cleaning.~~

Section 4 – Unpaved Areas

~~Unpaved areas traveled about stock piles shall be treated with asphaltic emulsion at the following rate of 0.16 gallons per square yard by plant personnel as needed. Fugitive dust emissions shall be reduced by at least 90 percent instantaneous control on a PM10 mass emission basis.~~

~~Treating of unpaved areas may be delayed by one day when:~~

- (a) ~~0.1 or more inches of rain have accumulated during the 24-hour period prior to the scheduled treatment.~~
- (b) ~~Unpaved areas are saturated with water such that chemical dust suppressants cannot be accepted by the surface.~~
- (c) ~~Unpaved areas are frozen or covered by ice, snow or standing water.~~
- (d) ~~The area is closed or abandoned.~~
- (e) ~~It is raining at the time of the scheduled treatment.~~

Section 5 – Open Aggregate Piles

Open aggregate piles consist of slag in various stages of processing. To maintain product quality and chemical stability, watering the stockpiles shall be the primary means of dust control. Water must be limited as to keep the moisture content of the product within standards.

<u>Pile ID</u>	<u>Acres</u>	<u>Material</u>	<u>Moisture %</u>	<u>Silt %</u>
101	0.15	Raw	2-5	1
103	0.03	4" x 1 1/2"	1-5	<1
104	0.04	1 1/4" x 3/4"	1-5	4-5
105	0.03	3/4" x 0"	2-6	4-5

Wind erosion – When visible emissions exceed 5 percent opacity from any piles, the affected piles shall be sprayed as required by water to eliminate wind erosion. ~~Water added to the product during processing provides added procedures specified in Section 11.~~

Section 6 – Slag Processing

Emissions from slag processing operations shall be controlled through the application of water. ~~Application rates and frequencies shall be sufficient to provide at least 95 percent control efficiency from continuous drop by limiting conveyor to pile with drop height not to less than 48 inches, front end loader batch drop by limiting the drop height to pile, truck or hopper not to less than 48 inches, and watering screening and crushing operations emission points. There shall be no~~ **Visible emissions shall not exceed 10% by Method 9, 6-minute average** evident from any batch drop, continuous drop, screening or crushing operation.

~~Slag that is dug out of the slag pits located beneath each electric arc furnace shall be transferred to dump trucks within the confines of the EAF shop building. Visible emissions shall not exceed 5 percent opacity from any building roof monitor or building opening as a result of this operation.~~

Section 7 – Vehicle Speed Control

~~Speed limits on paved roads shall be posted to be 20 mph. Speed limits on unpaved roads shall be 10 mph.~~

~~Compliance with these speed limits shall be monitored by plant security guards. Upon violation, employees shall receive a written warning, followed by a one day suspension if a second violation occurs. Visitors to the plant shall be denied access if repeated violations occur.~~

Section 8 – Material Spill control

~~Incidents of material spillage on plant property leading to visible fugitive dust shall be investigated and properly cleaned up by the person responsible for implementing the plan. That person shall arrange for prompt cleanup and shall contact the party responsible for the spill to insure that corrective action can be taken.~~

Section 9 – Monitoring and Record Keeping

~~Records shall be kept within a journal which will be updated on a daily basis by the engineering department. The journals shall include sweeping and spill control activities, and dust suppressant application, and water spray frequency and amount. Also, the journal shall contain the amount of water sprayed on the aggregate piles, the amount of water sprayed at the slag quench station, and the amount of water sprayed on the slag processing spray bars. The journals records shall be kept in storage for a minimum of three years and shall be available for inspection or copying upon reasonable prior notice.~~

Section 10 – Compliance Schedule

~~This plan shall be fully implemented when construction is completed. Until that time the plan shall be implemented within portions of the site where construction is considered complete. Where construction is incomplete appropriate control measures shall be implemented, but cannot be comprehensively addressed. These activities shall be included with the engineering journal.~~

Section 11 – Unpaved Roadway and Unpaved Area Opacity Limits

~~Visible emissions from any unpaved road segment or unpaved area shall not exceed 5 percent opacity as averaged over any consecutive 3-minute period. All visible emission observations shall be determined in accordance with 40 CFR 60 Appendix A Method 9, except as otherwise provided below:~~

- ~~(a) — In viewing fugitive emissions generated by vehicular traffic, the observer shall be positioned in accordance with the provisions of paragraph 2.1 of Method 9 except that the observer need not position himself with his back to the sun.~~
- ~~(b) — The observer shall begin reading when a vehicle crosses his line of sight which shall be approximately perpendicular to the trajectory of that vehicle. The observer shall continue to observe and record visible emission opacities at 15-second intervals along that same line of sight until no less than twelve consecutive opacity readings have been obtained.~~
- ~~(c) — If IDEM inspectors note opacity readings greater than 5 percent, Steel Dynamics, Inc. – Flat Roll Division shall provide supplemental dust suppressant treatment of unpaved roads and parking lots within 24 hours except as provided for in sections 3 and 4.~~

Section 12 – References

- ~~1. — C. Cowherd, Jr. et al., Iron and Steel Plant Open Dust Source Fugitive Emission Evaluation, EPA-600/2-79-103, U.S. Environmental Protection Agency, Cincinnati, OH, May 1979.~~

The following changes to the fugitive dust control plan have been approved by the OAQ Compliance and Enforcement Branch.

Fugitive Dust Control Plan

Steel Dynamics, Inc. - Flat Roll Division
~~DeKalb County Roads 44 and 59~~
4500 County Road 59
Butler, Indiana

Section 1 – Introduction

The following control plan, when implemented, is designed to reduce uncontrolled fugitive dust based on PM10 mass emissions basis from paved roadways and parking lots ~~by at least 50 percent and down to 16.8 pounds of silt per mile~~, unpaved roadways and traveled open areas, ~~by at least 90 percent instantaneous control and storage piles, and slag processing operations by 97 percent.~~

The plan shall be implemented on a year-round basis until such time as another plan is approved or ordered by the Indiana Department of Environmental Management.

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- ~~(eb)~~ It is raining at the time of the scheduled cleaning.
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All roads at the slag handling processing facility shall be unpaved and treated by plant personnel with an asphaltic emulsion at a rate of at least 0.16 gallons per square yard, once per month based on average daily 70-80 vehicles of travel.

Asphalt emulsion products (AE-30) or equivalent shall be applied on a frequency of once per month, April through October, unless conditions require frequency to increase or as required by IDEM or USEPA, to insure fugitive dust control. Snow cover, inclement weather and freezing/thawing shall preclude application November through March.

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104	0.04	1 1/4" x 3/4 "	1-5	4-5
105	0.03	3/4" x 0"	2-6	4-5

Wind erosion – When visible emissions exceed 5 percent opacity from any piles, the affected piles shall be sprayed as required by water to eliminate wind erosion. Water added to the product during processing provides added procedures specified in Section 447.

Section 6 5 – Slag Processing

Emissions from slag processing operations shall be controlled through the application of water. ~~Application rates and frequencies shall be sufficient to provide at least 95 percent control efficiency from~~

~~continuous drop by limiting conveyor to pile with drop height not to less than 48 inches, front end loader batch drop by limiting the drop height to pile, truck or hopper not to less than 48 inches, and watering screening and crushing operations emission points. There shall be no V~~visible emissions **shall not exceed 10% by Method 9, 6-minute average** evident from any batch drop, continuous drop, screening or crushing operation.

~~Slag that is dug out of the slag pits located beneath each electric arc furnace shall be transferred to dump trucks within the confines of the EAF shop building. Visible emissions shall not exceed 5 percent opacity from any building roof monitor or building opening as a result of this operation.~~

Section 7 – Vehicle Speed Control

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~~Compliance with these speed limits shall be monitored by plant security guards. Upon violation, employees shall receive a written warning, followed by a one day suspension if a second violation occurs. Visitors to the plant shall be denied access if repeated violations occur.~~

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Section 10 – Compliance Schedule

~~This plan shall be fully implemented when construction is completed. Until that time the plan shall be implemented within portions of the site where construction is considered complete. Where construction is incomplete appropriate control measures shall be implemented, but cannot be comprehensively addressed. These activities shall be included with the engineering journal.~~

Section 44 7 – Unpaved Roadway and Unpaved Area Opacity Limits

Visible emissions from any unpaved road segment or unpaved area shall not exceed 5 percent opacity as averaged over any consecutive 3-minute period. All visible emission observations shall be determined in accordance with 40 CFR 60 Appendix A Method 9, except as otherwise provided below:

- (a) In viewing fugitive emissions generated by vehicular traffic, the observer shall be positioned in accordance with the provisions of paragraph 2.1 of Method 9 except that the observer need not position himself with his back to the sun.
- (b) The observer shall begin reading when a vehicle crosses his line of sight which shall be approximately perpendicular to the trajectory of that vehicle. The observer shall continue

to observe and record visible emission opacities at 15-second intervals along that same line of sight until no less than twelve consecutive opacity readings have been obtained.

- ~~(c) If IDEM inspectors note opacity readings greater than 5 percent, Steel Dynamics, Inc. Flat Roll Division shall provide supplemental dust suppressant treatment of unpaved roads and parking lots within 24 hours except as provided for in sections 3 and 4.~~

Section 12—References

- ~~1. C. Cowherd, Jr. et al., Iron and Steel Plant Open Dust Source Fugitive Emission Evaluation, EPA-600/2-79-103, U.S. Environmental Protection Agency, Cincinnati, OH, May 1979.~~

Conclusion and Recommendation

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 033-28510-00043. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.



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: Barry Smith
Steel Dynamics, Inc. – Flat Roll Division
4500 CR 59
Butler, IN 46721

DATE: February 11, 2011

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

SUBJECT: Final Decision
Significant Permit Modification
033-28510-00043

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:
Glenn Pushis - VP
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.

Final Applicant Cover letter.dot 11/30/07



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

February 11, 2011

TO: Butler 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 Dynamics, Inc. – Flat Roll Division
Permit Number: 033-28510-00043

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	GHOTOPP 2/11/2011 SDI- Steel Dynamics, Inc 033-28510-00043 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	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Barry Smith SDI- Steel Dynamics, Inc 4500 CR 59 Butler IN 46721 (Source CAATS) via confirmed delivery										
2		Glenn Pushis VP SDI- Steel Dynamics, Inc 4500 CR 59 Butler IN 46721 (RO CAATS)										
3		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
4		DeKalb County Commissioners 100 South Main Street Auburn IN 46706 (Local Official)										
5		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 (Affected Party)										
6		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 (Affected Party)										
7		Mr. Dave Weilbaker 1423 Urban Ave Auburn IN 46706 (Affected Party)										
8		DeKalb County Health Department 215 E. 9th, County Office Building, Suite 201 Auburn IN 46706-2336 (Health Department)										
9		Butler Public Library 340 South Broadway Street Butler IN 46721-1308 (Library)										
10		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
11		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
12		21Alive P.O. Box 2121 Fort Wayne IN 46801 (Affected Party)										
13		NBC33 3401 Butler Road Fort Wayne IN 46808 (Affected Party)										
14		Mr. Mario Wilson Laser, Inc. 654 Kentucky Street Gridley CA 95948-2118 (Affected Party)										
15		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
14			

Mail Code 61-53

IDEM Staff	GHOTOPP 2/11/2011 SDI- Steel Dynamics, Inc 033-28510-00043 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Niann Lautzenhiser 660 LN 210 Hamilton LK Hamilton IN 46742 (Affected Party)										
2		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 (Affected Party)										
3		Butler City Council and Mayors Office 201 S. Broadway Butler IN 47621 (Local Official)										
4		Ms. Camille Sears 502 W Lomita Ave Ojai CA 93023 (Affected Party)										
5		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
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15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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