



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: April 14, 2010

RE: Magnesium Technologies Corp., d/b/a/ Rossborough / 141-28820-00185

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

Magnesium Technologies Corp., d/b/a Rossborough
205 State Road 104
Walkerton, Indiana 46574

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

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

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

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

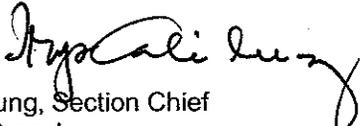
Operation Permit No.: F141-28820-00185	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 14, 2010 Expiration Date: April 14, 2015

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary magnesium processing and packaging operation.

Source Address:	205 State Road 104, Walkerton, Indiana 46574
Mailing Address:	P. O. Box 175, Walkerton, IN 46574
General Source Phone Number:	(574) 586-9559
SIC Code:	3341
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Three (3) Primary Magnesium Granulating lines, identified as MgL1, MgL2, and MgL3, constructed in 1994, consisting of one (1) chipper and two (2) grinders per line, with a maximum capacity of 1,000 pounds per hour per line, each equipped with one (1) of three (3) cyclones integral to the lines, identified as C1, C2, and C3, and exhausting to stacks C1, C2, and C3.
- (b) Two (2) Lime Receiving Silos, identified as S1 and S2, constructed in 2002, with a combined capacity of 19,000 pounds per hour and each having a storage capacity of 150,000 pounds, each controlled by one (1) of two (2) dust collectors for particulate control, identified as CF1 and CF2, and exhausting to stacks CF1 and CF2..
- (c) Two (2) Lime Granulating and Screening Units, identified as LG1 and LG2, constructed in 2002, with a combined process capacity of 19,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-A, and exhausting to stack DF02-4-A.
- (d) Five (5) Pig Storage Hoppers for Granulated Lime, identified as PS1 – PS5, constructed in 2002, with a combined capacity of 19,000 pounds per hour, and each having a storage capacity of 200,000 pounds, controlled by one (1) dust collector for particulate control, identified as CF3, and exhausting to stack CF3.
- (e) Two (2) Lime Storage Vessels, identified as LSV1 and LSV2, constructed in 1994, with a combined capacity of 16,000 pounds per hour, and each having a storage capacity of 30,000 pounds, each controlled by one (1) of two (2) dust collectors for particulate control, identified as WB1 and DF02-2, constructed in 2002, and exhausting to stacks WB1 and DF02-2.

- (f) One (1) Whirlaire Flow Lime Blending Unit, identified as BCL, constructed in 1998, rated at 16,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-B, constructed in 2002, and exhausting to stack DF02-4-B.
- (g) One (1) enclosed vehicle loading operation, rated at 16,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-B, constructed in 2002, and exhausting to stack DF02-4-B.

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

This source also includes the following insignificant activities:

- (a) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (b) 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.
 - (1) One (1) 300 gallon above ground Diesel Fuel Tank (over the road diesel).
 - (2) One (1) 500 gallon above ground Diesel Fuel Tank (off the road diesel tank) for yard trucks and forklifts.
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
 - (1) Source maintenance activities.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (1) Source maintenance activities.
- (e) Closed loop heating and cooling systems.
 - (1) Electric forced air heating and cooling systems.
- (f) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.
 - (1) Enclosed subsurface septic system.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) On-site fire and emergency response training approved by the department.
 - (1) "No open flame" training conducted for local emergency response agencies.
- (i) A laboratory as defined in 326 IAC 2-7-1(21)(D).
 - (1) QA/QC physical analysis laboratory.

- (j) Other categories with emissions below insignificant thresholds:
 - (1) One (1) 13,000 gallon Liquefied Nitrogen Tank.
 - (2) Four (4) Argon Fire Suppression Systems using bottled Argon Cylinders.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

-
- (a) This permit, 097-28923-00514, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (i) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (ii) the certification is 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

(a) A Preventive Maintenance Plan 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.

The Permittee shall implement the PMPs.

(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 Permittee shall implement the PMPs.

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
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 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

- (a) All terms and conditions of permits established prior to 097-28923-00514 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

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

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

(1) That this permit contains a material mistake.

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

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

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

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

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

C.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 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

The Permittee shall not operate an incinerator 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).

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.7 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 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

C.11 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 prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

no later than ninety (90) days after the date of issuance of this permit.

The ERP does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in 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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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 require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported 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 not 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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.

Stratospheric Ozone Protection

C.17 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 applicable standards for recycling and emissions reduction.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Three (3) Primary Magnesium Granulating lines, identified as MgL1, MgL2, and MgL3, constructed in 1994, consisting of one (1) chipper and two (2) grinders per line, with a maximum capacity of 1,000 pounds per hour per line, each equipped with one (1) of three (3) cyclones integral to the lines, identified as C1, C2, and C3, and exhausting to stacks C1, C2, and C3.
- (b) Two (2) Lime Receiving Silos, identified as S1 and S2, constructed in 2002, with a combined capacity of 19,000 pounds per hour and each having a storage capacity of 150,000 pounds, each controlled by one (1) of two (2) dust collectors for particulate control, identified as CF1 and CF2, and exhausting to stacks CF1 and CF2..
- (c) Two (2) Lime Granulating and Screening Units, identified as LG1 and LG2, constructed in 2002, with a combined process capacity of 19,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-A, and exhausting to stack DF02-4-A.
- (d) Five (5) Pig Storage Hoppers for Granulated Lime, identified as PS1 – PS5, constructed in 2002, with a combined capacity of 19,000 pounds per hour, and each having a storage capacity of 200,000 pounds, controlled by one (1) dust collector for particulate control, identified as CF3, and exhausting to stack CF3.
- (e) Two (2) Lime Storage Vessels, identified as LSV1 and LSV2, constructed in 1994, with a combined capacity of 16,000 pounds per hour, and each having a storage capacity of 30,000 pounds, each controlled by one (1) of two (2) dust collectors for particulate control, identified as WB1 and DF02-2, constructed in 2002, and exhausting to stacks WB1 and DF02-2.
- (f) One (1) Whirlaire Flow Lime Blending Unit, identified as BCL, constructed in 1998, rated at 16,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-B, constructed in 2002, and exhausting to stack DF02-4-B.
- (g) One (1) enclosed vehicle loading operation, rated at 16,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-B, constructed in 2002, and exhausting to stack DF02-4-B.

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

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

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

Pursuant to 326 IAC 2-2, the source has chosen to limit PM emissions to below two hundred fifty (250) tons per year. Compliance with these limits, shall limit the source-wide total potential to emit PM to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable:

Unit	Control	Stack	PM (pounds per hour)
Magnesium Granulating line 1 (MgL1)	C1	C1	1.00
Magnesium Granulating line 2 (MgL2)	C2	C2	1.00
Magnesium Granulating line 3 (MgL3)	C3	C3	1.00
Lime Receiving Silo 1 (S1)	CF1	CF1	2.13
Lime Receiving Silo 1 (S2)	CF2	CF2	2.13

Unit	Control	Stack	PM (pounds per hour)
Lime Granulating and Screening Units (LG1 and LG2)	DF02-4-A	DF02-4-A	0.16 combined
Pig Storage Hopper (PS1-PS5)	CF3	CF3	4.26 combined
Lime Storage Vessel 1 (LSV1)	WB1	WB1	1.74
Lime Storage Vessel 2 (LSV2)	DF02-2	DF02-2	1.74
Whirlaire Flow Blending (BCL)	DF02-4-B	DF02-4-B	3.48
Vehicle Loading	DF02-4-B	DF02-4-B	1.00

D.1.2 PM10 and PM2.5 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the source has chosen to limit PM10 and PM2.5 emissions to below 100 tons per year, each. Therefore, 326 IAC 2-7 (Part 70 Permit Program) will not be applicable.

The source will be in compliance with the PM10 and PM2.5 limits by limiting the controlled units to less than a total of 53.00 tons per twelve (12) consecutive month period, each. The controlled units shall be limited as follows:

Unit	Control	Stack	PM10 (pounds per hour)	PM2.5 (pounds per hour)
Magnesium Granulating Line 1 (MgL1)	C1	C1	1.00	1.00
Magnesium Granulating Line 2 (MgL2)	C2	C2	1.00	1.00
Magnesium Granulating Line 3 (MgL3)	C3	C3	1.00	1.00
Lime Receiving Silo 1 (S1)	CF1	CF1	1.065	1.065
Lime Receiving Silo 1 (S2)	CF2	CF2	1.065	1.065
Lime Granulating and Screening Units (LG1 and LG2)	DF02-4-A	DF02-4-A	0.08 combined	0.08 combined
Pig Storage Hopper (PS1-PS5)	CF3	CF3	2.13 combined	2.13 combined
Lime Storage Vessel 1 (LSV1)	WB1	WB1	0.895	0.895
Lime Storage Vessel 2 (LSV2)	DF02-2	DF02-2	0.895	0.895
Whirlaire Flow Blending (BCL)	DF02-4-B	DF02-4-B	1.79	1.79
Vehicle Loading	DF02-4-B	DF02-4-B	0.50	0.50

D.1.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the source shall not exceed the pound per hour emission rate established as E in the following formula:

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

$$E = 4.10 P^{0.67}$$

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

The emissions rate E has been established for the units as follows:

Process Description (Emission Units)	Process Weight Rate (tons/hr)	PM Emission (lb/hr)
Magnesium Granulating Line 1 (MgL1)	0.50	2.58
Magnesium Granulating Line 2 (MgL2)	0.50	2.58
Magnesium Granulating Line 3 (MgL3)	0.50	2.58
Lime Receiving Silo 1 (S1)	4.75	11.65
Lime Receiving Silo 1 (S2)	4.75	11.65
Lime Granulating and Screening Units (LG1 and LG2)	9.50	18.53
Pig Storage Hopper (PS1-PS5)	9.50	18.53
Lime Storage Vessel 1 (LSV1)	8.00	16.51
Lime Storage Vessel 2 (LSV2)	8.00	16.51
Whirlaire Flow Blending (BCL) Vehicle Loading	8.00	16.51

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

A Preventive Maintenance Plan, Section B - Preventive Maintenance Plan, contains the Permittee's obligation with regards to the records required by this condition it, is required for this facility and its control devices.

Compliance Determination Requirements

D.1.5 Particulate Control [326 IAC 2-8-5(a)(4)]

(a) In order to comply with Conditions D.1.1, D.1.2 and D.1.3, particulate from the magnesium grinding lines (MgL1, MgL2, and MgL3) shall be controlled by cyclones and the Permittee shall operate the control device in accordance with manufacturer's specifications.

In order to comply with Conditions D.1.1, D.1.2 and D.1.3, particulate from the Lime Storage Silos (S1, S2), the Lime Granulating and Screening Units (LG1, LG2), the Pig Storage Hoppers (PS1-PS5), the Lime Storage Vessels (LSV1, LSV2), the Whirlaire Lime Blending Unit (BCL), and Vehicle Loading shall be controlled by baghouses and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

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

D.1.6 Visible Emissions Notations

(a) Daily visible emission notations of the cyclones (C1, C2, C3) and the dust collectors (CF1, CF2, DF02-4-A, CF3, WB1, DF02-2, and DF02-4-B) 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, 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, Section C Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the pressure drop across the dust collectors at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collectors is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps, Section C- Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Section C Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition, failure to take response steps shall be considered a deviation from this permit.

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

D.1.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouses 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. Section C Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition, failure to take response shall be considered a deviation from this permit.
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Section C Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition, failure to take response steps shall be considered a deviation from this permit.

D.1.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Section C Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition, failure to take response steps shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of once per day visible emission notations of C1, C2, C3, CF1, CF2, DF02-4-A, CF3, WB1, DF02-2, and DF02-4-B stack exhaust. The permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records once per day of the pressure drop during normal operation across CF1, CF2, DF02-4-A, CF3, WB1, DF02-2, and DF02-4-B. 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) Section C General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

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

Source Name: Magnesium Technologies Corp., d/b/a Rossborough
Source Address: 205 State Road 104, Walkerton, Indiana 46574
Mailing Address: P. O. Box 175, Walkerton, IN 46574
FESOP Permit No.: F141-28820-00185

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Magnesium Technologies Corp., d/b/a Rossborough
Source Address: 205 State Road 104, Walkerton, Indiana 46574
Mailing Address: P. O. Box 175, Walkerton, IN 46574
FESOP Permit No.: F141-28820-00185

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) 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 within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Source Name: Magnesium Technologies Corp., d/b/a Rossborough
Source Address: 205 State Road 104, Walkerton, Indiana 46574
Mailing Address: P. O. Box 175, Walkerton, IN 46574
FESOP Permit No.: F141-28820-00185

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

Page 1 of 2

<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>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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**

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

Source Background and Description

Source Name:	Magnesium Technologies Corp., d/b/a Rossborough
Source Location:	205 State Road 104, Walkerton, IN 46574
County:	St. Joseph
SIC Code:	3341
Permit Renewal No.:	141-28820-00185
Permit Reviewer:	Bruce Farrar

On March 10, 2010, the Office of Air Quality (OAQ) had a notice published in South Bend Tribune, South Bend, Indiana, stating that Magnesium Technologies Corp., d/b/a Rossborough had applied for a FESOP Renewal to continue to operate a stationary magnesium processing and packaging facility. The notice also stated that the OAQ proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

No comments were received during the public notice period.

Additional Changes

Upon further evaluation, IDEM decided to make the following changes:

1. For clarity, IDEM 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 Permit tee's obligations with regard to the records required by this condition."*
2. IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether 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. The certification condition has been removed. All statements to whether a certification, pursuant to the former Section B - Certification, is needed or not have been removed.

Section B - Credible Evidence and Section C - Asbestos Abatement Projects still require certification as the underlying rules also require certifications.
3. IDEM has decided to clarify what rule requirements a certification needs to meet. IDEM has decide to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already addresses this issue.
4. IDEM has decided to clarify Section B - Preventive Maintenance Plan.
5. IDEM has decided to clarify Section D - Testing Requirements.
6. IDEM has included the replacement of an instrument as an acceptable action.

7. IDEM has decided to allow the Permittee the option of using manufacturer's recommendations for the calibration frequency.
8. The word "status" has been added to Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.
9. The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

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

- (a) **A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:** ~~If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:~~
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (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 Permittee shall implement the PMPs.

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual as defined by 326 IAC 2-1.1-1(1).

- (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 or potential to emit. ~~The PMPs~~ **PMPs and their submittal** do not require ~~the a~~ **a certification that meets the requirements of 326 IAC 2-8-5(a)(1)** by "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.

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

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan of this permit~~ **Section B Preventive Maintenance Plan contains the Permittee's obligations with regard to the records required by this condition**, is required for this facility and its control devices.

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

D.1.6 Visible Emissions Notations

- (a) ***
- (b) ***
- (c) ***
- (d) ***
- (e) If abnormal emissions are observed, ~~the Permittee shall take reasonable steps in accordance with Section C – Response to Excursions or Exceedances~~ **Section C Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition**. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the pressure drop across the dust collectors at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collectors is outside the normal range of 0.5 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- Response to Excursions or Exceedances~~ **contains the Permittee's obligations with regard to the records required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. **Section C Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition**, Failure to take response steps ~~in accordance with Section C – Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

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

D.1.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouses 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. **Section C Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition,** ~~Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. **Section C Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition,** ~~Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

D.1.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. **Section C Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition,** ~~Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

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

D.1.10 Record Keeping Requirements

- (a) To document **the compliance status** with Condition D.1.6, the Permittee shall maintain records of once per day visible emission notations of C1, C2, C3, CF1, CF2, DF02-4-A, CF3, WB1, DF02-2, and DF02-4-B stack exhaust. The permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records once per day of the pressure drop during normal operation across CF1, CF2, DF02-4-A, CF3, WB1, DF02-2, and DF02-4-B. The permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit~~ **Section C General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.**

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

Source Name: Magnesium Technologies Corp., d/b/a Rossborough
Source Address: 205 State Road 104, Walkerton, Indiana 46574
Mailing Address: P. O. Box 175, Walkerton, IN 46574
FESOP Permit No.: F141-28820-00185

Months: _____ to _____ Year: _____

<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: _____

~~Attach a signed certification to complete this report.~~

IDEM Contact

- (a) Questions regarding this proposed FESOP Renewal can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	Magnesium Technologies Corp., d/b/a Rossborough
Source Location:	205 State Road 104, Walkerton, IN 46574
County:	St. Joseph
SIC Code:	3341
Permit Renewal No.:	141-28820-00185
Permit Reviewer:	Bruce Farrar

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Magnesium Technologies Corp., d/b/a Rossborough relating to the operation of a stationary magnesium processing and packaging facility.

History

On December 28, 2009, Magnesium Technologies Corp., d/b/a Rossborough submitted an application to the OAQ requesting to renew its operating permit. Magnesium Technologies Corp., d/b/a Rossborough was issued a FESOP on October 6, 2005.

Permitted Emission Units and Pollution Control Equipment

- (a) Three (3) Primary Magnesium Granulating lines, identified as MgL1, MgL2, and MgL3, constructed in 1994, consisting of one (1) chipper and two (2) grinders per line, with a maximum capacity of 1,000 pounds per hour per line, each equipped with one (1) of three (3) cyclones integral to the lines, identified as C1, C2, and C3, and exhausting to stacks C1, C2, and C3.
- (b) Two (2) Lime Receiving Silos, identified as S1 and S2, constructed in 2002, with a combined capacity of 19,000 pounds per hour and each having a storage capacity of 150,000 pounds, each controlled by one (1) of two (2) dust collectors for particulate control, identified as CF1 and CF2, and exhausting to stacks CF1 and CF2..
- (c) Two (2) Lime Granulating and Screening Units, identified as LG1 and LG2, constructed in 2002, with a combined process capacity of 19,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-A, and exhausting to stack DF02-4-A.
- (d) Five (5) Pig Storage Hoppers for Granulated Lime, identified as PS1 – PS5, constructed in 2002, with a combined capacity of 19,000 pounds per hour, and each having a storage capacity of 200,000 pounds, controlled by one (1) dust collector for particulate control, identified as CF3, and exhausting to stack CF3.
- (e) Two (2) Lime Storage Vessels, identified as LSV1 and LSV2, constructed in 1994, with a combined capacity of 16,000 pounds per hour, and each having a storage capacity of 30,000 pounds, each controlled by one (1) of two (2) dust collectors for particulate control, identified as WB1 and DF02-2, constructed in 2002, and exhausting to stacks WB1 and DF02-2.

- (f) One (1) Whirlaire Flow Lime Blending Unit, identified as BCL, constructed in 1998, rated at 16,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-B, constructed in 2002, and exhausting to stack DF02-4-B.
- (g) One (1) enclosed vehicle loading operation, rated at 16,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-B, constructed in 2002, and exhausting to stack DF02-4-B.

Summary Table of Process, Controls and Stacks

Process	Control	Stack
MgL1	C1	C1
MgL2	C2	C2
MgL3	C3	C3
S1	CF1	CF1
S2	CF2	CF2
LG1	DF02-4-A	DF02-4-A
LG2		
PS1	CF3	CF3
PS2		
PS3		
PS4		
PS5		
LSV1	WB1	WB1
LSV2	DF02-2	DF02-2
BCL	DF02-4-B	DF02-4-B
Enclosed Vehicle Loading	DF02-4-B	DF02-4-B

Emission Units and Pollution Control Equipment Removed From the Source

No emission units or pollution control equipment have been removed from the source.

Insignificant Activities

- (a) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (b) 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.
 - (1) One (1) 300 gallon above ground Diesel Fuel Tank (over the road diesel).
 - (2) One (1) 500 gallon above ground Diesel Fuel Tank (off the road diesel tank) for yard trucks and forklifts.
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
 - (1) Source maintenance activities.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

- (1) Source maintenance activities.
- (e) Closed loop heating and cooling systems.
 - (1) Electric forced air heating and cooling systems.
- (f) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.
 - (1) Enclosed subsurface septic system.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) On-site fire and emergency response training approved by the department.
 - (1) "No open flame" training conducted for local emergency response agencies.
- (i) A laboratory as defined in 326 IAC 2-7-1(21)(D).
 - (1) QA/QC physical analysis laboratory.
- (j) Other categories with emissions below insignificant thresholds:
 - (1) One (1) 13,000 gallon Liquefied Nitrogen Tank.
 - (2) Four (4) Argon Fire Suppression Systems using bottled Argon Cylinders.

Existing Approvals

Since the issuance of the FESOP 141-20665-00185 on October 6, 2005, the source has constructed or has been operating under the following approvals as well:

- (a) Significant Permit Revision No.: 141-20775-00185, issued on May 1, 2006.

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

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the cyclones, identified as C1, C2, and C3 be considered as an integral part of the magnesium granulating lines:

- (a) The cyclones were determined to be an intergral part of the magnesium granulating lines pursuant to the issuance of Registration permit No: 091-3626-00073, issued on June 17, 1994 and no changes have been made in the operation of the magnesium granulating lines since the determination.
- (b) The cyclones primary purpose isn't air pollution control. The cyclones serve as air separation devices prior to the final screening located at the base of the cyclones.

IDEM, OAQ has evaluated the justifications and agreed that the cyclones will be considered as an integral part of the magnesium granulating lines. Therefore, the permitting level will be determined using the potential to emit after the cyclones, identified as C1, C2, and C3. Conditions in the proposed permit will specify that these cyclones shall operate at all times when the magnesium granulating lines are in operation.

Enforcement

There are no enforcement actions pending.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

County Attainment Status

The source is located in St. Joseph County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including St. Joseph County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

St. Joseph County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} 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 PM_{2.5} emissions until 326 IAC 2-2 is revised.

- (c) **Other Criteria Pollutants**
St. Joseph County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	385.88
PM ₁₀	375.39
PM _{2.5}	375.39
SO ₂	negl.
VOC	negl.
CO	negl.
NO _x	negl.

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and PM_{2.5} is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM₁₀ and PM_{2.5} emissions to less than Title V levels, therefore the source will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

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

Emission Unit ID Process Description	Potential To Emit (tons/year)							
	PM	PM10	PM2.5	SO ₂	VOC	CO	NO _x	HAPs
MgL1 Magnesium Line 1	4.38	4.38	4.38	-	-	-	-	-
MgL2 Magnesium Line 2	4.38	4.38	4.38	-	-	-	-	-
MgL3 Magnesium Line 3	4.38	4.38	4.38	-	-	-	-	-
S1 Lime Receiving Silo 1	9.33	4.66	4.66	-	-	-	-	-
S2 Lime Receiving Silo 2	9.33	4.66	4.66	-	-	-	-	-
LG1 Lime Granulating & Screening Unit 1	0.70	0.37	0.37	-	-	-	-	-
LG2 Lime Granulating & Screening Unit 2				-	-	-	-	-
PS1 – PS5 Pig Storage Hoppers	18.66	9.32	9.32	-	-	-	-	-
LSV1 Lime Storage Vessel 1	7.62	3.92	3.92	-	-	-	-	-
LSV2 Lime Storage Vessel 2	7.62	3.92	3.92	-	-	-	-	-
BLC Whirlaire Blending Unit	15.24	7.85	7.85	-	-	-	-	-
Vehicle Loading	4.38	2.18	2.18	-	-	-	-	-
Insignificant Activities	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.
Total Emissions	86.02	50.01	50.01	Neg.	Neg.	Neg.	Neg.	Neg.
Title V Major Source Thresholds	NA	100	100	100	100	100	100	Combined 25 Single 10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA

- (a) The existing stationary source is not major for PSD because the emissions of each criteria pollutant will continue to be limited to less than two hundred fifty (<250) tons per year, and is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation isn't one of the twenty-eight listed source categories under 326 IAC 2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.
- (c) The source has requested the limits for PM10 and PM2.5 in order to allow for future expansion without having to adjust these current limits.

Federal Rule Applicability

NSPS

- (a) The requirements of the New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing Plants (40 CFR 60.670), Subpart OOO are not included in the permit, because U.S.EPA Region 3 Determination Control Number 0400016, authored by Michael Alushin and dated November 18, 2003, states "equipment used to process lime product is not subject to New Source Performance Standards (NSPS) subpart OOO".
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

NESHAP

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (40 CFR 63, Subpart CCCCCC), are not included in the permit, because the source does not have any gasoline storage tanks.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Primary Magnesium Refining, (40 CFR 63.9881), Subpart TTTTTT are not included in the permit because the source is not a primary magnesium refinery.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Nonferrous Metals Processing Area Sources, (40 CFR 63.11462), Subpart TTTTTT are not included in the permit because the source is not a secondary nonferrous metals processing facility.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
 The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (Prevention of Significant Deterioration)
 This FESOP will limit PM10 and PM2.5 emissions to below one hundred (100) tons per year, each. The source has also chosen to limit PM emissions to below two hundred and fifty (250) tons per year. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration) will not be applicable. The source has chosen to limit the PM emissions as follows:

Unit	Control	Stack	PM (pounds per hour)
Magnesium Granulating Line 1 (MgL1)	C1	C1	1.00
Magnesium Granulating Line 2 (MgL2)	C2	C2	1.00
Magnesium Granulating Line 3 (MgL3)	C3	C3	1.00
Lime Receiving Silo 1 (S1)	CF1	CF1	2.13
Lime Receiving Silo 1 (S2)	CF2	CF2	2.13
Lime Granulating and Screening Unit 1 (LG1)	DF02-4-A	DF02-4-A	0.16 combined
Lime Granulating and Screening Unit 2 (LG2)			
Pig Storage Hopper (PS1-PS5)	CF3	CF3	4.26 combined

Unit	Control	Stack	PM (pounds per hour)
Lime Storage Vessel 1 (LSV1)	WB1	WB1	1.74
Lime Storage Vessel 2 (LSV2)	DF02-2	DF02-2	1.74
Whirlaire Flow Blending (BCL)	DF02-4-B	DF02-4-B	3.48
Vehicle Loading	DF02-4-B	DF02-4-B	1.00

Compliance with these limits renders the requirements of 326 IAC 2-2 not applicable.

The source will be in compliance by using the dust collectors and cyclones at all times during process operations.

326 IAC 2-6 (Emission Reporting)

This existing source is located in St. Joseph County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will continue to be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

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

Unit	Control	Stack	PM10 (pounds per hour)	PM2.5 (pounds per hour)
Magnesium Granulating Line 1 (MgL1)	C1	C1	1.00	1.00
Magnesium Granulating Line 2 (MgL2)	C2	C2	1.00	1.00
Magnesium Granulating Line 3 (MgL3)	C3	C3	1.00	1.00
Lime Receiving Silo 1 (S1)	CF1	CF1	1.065	1.065
Lime Receiving Silo 1 (S2)	CF2	CF2	1.065	1.065
Lime Granulating and Screening Units (LG1 and LG2)	DF02-4-A	DF02-4-A	0.08 combined	0.08 combined
Pig Storage Hopper (PS1-PS5)	CF3	CF3	2.13 combined	2.13 combined
Lime Storage Vessel 1 (LSV1)	WB1	WB1	0.895	0.895
Lime Storage Vessel 2 (LSV2)	DF02-2	DF02-2	0.895	0.895
Whirlaire Flow Blending (BCL)	DF02-4-B	DF02-4-B	1.79	1.79
Vehicle Loading	DF02-4-B	DF02-4-B	0.50	0.50

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 5-1-1 (Opacity Limitations)

Magnesium Technologies is not located north of Kern Road and East of Pine Road. Therefore, 326 IAC 5-1-2(2) does not apply.

State Rule Applicability – Individual Facilities

Magnesium/Lime Processing

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

The particulate matter (PM) from the Magnesium Grinding Lines 1, 2, and 3; the Lime Granulating Line; the Blending Line, and Vehicle Loading shall be limited by the following:

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:

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

The emissions rate E has been established for the units as follows:

Process Description (Emission Units)	Process Weight Rate (tons/hr)	PM Emission (lb/hr)
Magnesium Granulating Line 1 (MgL1)	0.50	2.58
Magnesium Granulating Line 2 (MgL2)	0.50	2.58
Magnesium Granulating Line 3 (MgL3)	0.50	2.58
Lime Receiving Silo 1 (S1)	4.75	11.65
Lime Receiving Silo 1 (S2)	4.75	11.65
Lime Granulating and Screening Units (LG1 and LG2)	9.50	18.53
Pig Storage Hopper (PS1-PS5)	9.50	18.53
Lime Storage Vessel 1 (LSV1)	8.00	16.51
Lime Storage Vessel 2 (LSV2)	8.00	16.51
Whirlaire Flow Blending (BCL)	8.00	16.51
Vehicle Loading		

The integral cyclones, C1, C2, and C3, shall be in operation at all times the Magnesium Granulating Lines are in operation in order to comply with this limit.

The dust collectors, CF1, CF2, CF3, WB1, DF02-2, DF02-4-A, and DF02-4-B shall be in operation at all times the Lime Granulating Line and the Blending Lines and Vehicle Loading are in operation in order to comply with this limit.

Brazing, Cutting, Soldering and Welding Equipment

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-1(b)(14), the brazing, cutting, soldering and welding equipment are exempt from the requirements of 326 IAC 6-3-2 because they are maintenance activities.

Above Ground Diesel Fuel Tank

326 IAC 8-4-6 (Gasoline Dispensing Facilities)
 The source is not subject to the requirements of 326 IAC 8-4-6, because the fuel tank stores diesel fuel.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

The emission units MgL1, MgL2, MgL3, S1, S2, LG1, LG2, PS1-PS5, LSV1, LSV2, and BCL have applicable compliance monitoring conditions as specified below:

Control	Parameter	Frequency	Range	Excursions and Exceedances
C1, C2, C3, CF1, CF2, DF02-4-A, CF3, WB1, DF02-2, and DF02-4-B	Visible Emissions	Daily	Normal-Abnormal	Response Steps
CF1, CF2, DF02-4-A, CF3, WB1, DF02-2, and DF02-4-B	Water Pressure Drop	Daily	0.5 to 6.0 inches	Response Steps

These monitoring conditions are necessary because:

The integral cyclones for the Magnesium Granulating Lines (MgL1, MgL2, MgL3) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

The dust collectors for the Lime Receiving Silos (S1, S2), the Lime Granulating & Screening Units (LS1, LG2), the Pig Storage Hoppers (PS1-PS5), the Lime Storage Vessels (LSV1 and LSV2), the Whirlaire Flow Lime Blending Unit (BCL), and the Vehicle Loading must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Recommendation

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

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

An application for the purposes of this review was received on December 28, 2009.

Conclusion

The operation of this stationary magnesium processing and packaging facility shall be subject to the conditions of the attached FESOP Renewal No. 141-28820-00185.

**Appendix A: Emissions Calculations
Summary of Emissions**

Company Name: Magnesium Technologies Corp., d/b/a Rossbrough
Address City IN Zip: 205 State Road 104
Permit Number: 141-28820-00185
Plt ID: 141-00185
Reviewer: Bruce Farrar
Date: December 28, 2009

		PM PTE Uncontrolled		PM PTE Controlled (tpy)	Throughput (tons/hour)	PM Limited PTE 326 IAC 6-3-2 (lbs/hr)	PM PSD Minor Limit PTE 326 IAC 2-2	
		(lbs/hr)	(tpy)				(lbs/hr)	(tpy)
MgL1 (Magnesium Granluating Line 1)	C1	1.00	4.38	4.38	0.50	2.58	1.00	4.38
MgL2 (Magnesium Granluating Line 2)	C2	1.00	4.38	4.38	0.50	2.58	1.00	4.38
MgL3 (Magnesium Granluating Line 3)	C3	1.00	4.38	4.38	0.50	2.58	1.00	4.38
S1 (Lime Storage Silo 1)	CF1	20.90	91.54	0.92	4.75	11.65	2.13	9.33
S2 (Lime Storage Silo 2)	CF2	20.90	91.54	0.92	4.75	11.65	2.13	9.33
LG1 (Granulating & Screening)	DF02-4-A	2.85	12.48	0.14	9.50	18.53	0.16	0.70
LG2 (Granulating & Screening)								
PS1-PS5 (Pig Storage Hoppers)	CF3	20.90	91.54	0.92	9.50	18.53	4.26	18.66
LSV1 (Lime Storage Vessels 1)	WB1	17.60	77.09	0.18	8.00	16.51	1.74	7.62
LSV2 (Lime Storage Vessels 2)	DF02-2	17.60	77.09	0.18	8.00	16.51	1.74	7.62
Whirlaire Flow Lime Blending Unit (BCL)	DF02-4-B	17.60	77.09	0.77	8.00	16.51	3.48	15.24
Closed Vehicle Loading	DF02-4-B	4.88	21.37	0.21	8.00	16.51	1.00	4.38
Totals		87.73	552.89	17.36			19.64	86.02

		PM10* PTE Uncontrolled		PM10* PTE Controlled (tpy)	⁽¹⁾ PM10* Limited PTE FESOP Minor (2-8)	
		(lbs/hr)	(tpy)		(lbs/hr)	(tpy)
MgL1 (Magnesium Granluating Line 1)	C1	1.00	4.38	4.38	1.00	4.38
MgL2 (Magnesium Granluating Line 2)	C2	1.00	4.38	4.38	1.00	4.38
MgL3 (Magnesium Granluating Line 3)	C3	1.00	4.38	4.38	1.00	4.38
S1 (Lime Storage Silo 1)	CF1	10.45	45.77	0.46	1.064	4.66
S2 (Lime Storage Silo 2)	CF2	10.45	45.77	0.46	1.064	4.66
LG1 (Granulating & Screening)	DF02-4-A	0.83	3.62	0.04	0.08	0.37
LG2 (Granulating & Screening)						
PS1-PS5 (Pig Storage Hoppers)	CF3	20.90	91.54	0.92	2.13	9.32
LSV1 (Lime Storage Vessels 1)	WB1	8.80	38.54	0.39	0.895	3.92
LSV2 (Lime Storage Vessels 2)	DF02-2	8.80	38.54	0.39	0.895	3.92
Whirlaire Flow Lime Blending Unit (BCL)	DF02-4-B	17.60	77.09	0.77	1.79	7.85
Closed Vehicle Loading	DF02-4-B	4.88	21.37	0.21	0.50	2.18
Totals		85.71	375.39	16.76	11.42	50.01

⁽¹⁾ PM10 FESOP (326 IAC 2-8) limit determined by limiting the controlled units to 50 tpy and applying a ratio to the controlled PTE.

* Assume PM10 = PM2.5

The source has requested the above limits in order to allow for possible future expansion without having to adjust the limits.

**Appendix A: Emissions Calculations
PM Emission Calculation**

Company Name: Magnesium Technologies Corp., d/b/a Rossbrough
Address City IN Zip: 205 State Road 104
Permit Number: 141-28820-00185
Pit ID: 141-00185
Reviewer: Bruce Farrar
Date: December 28, 2009

Emission Unit ID (Process Description)	Control Device	Capacity (tons processed per hour)	Emission Factor (lbs of PM per ton of material processed)	Potential to Emit PM (lbs/hr)	Potential to Emit PM (tons/year)	Control Efficiency (%)	Controlled PM Emissions (lb/hr)	Controlled PM Emissions (tons/year)
⁽¹⁾ Unloading Material (SCC 3-05-016-15) S1 (Lime Storage Silo 1)	CF1	9.50	2.20	20.90	91.54	99.0%	0.21	0.92
	S2 (Lime Storage Silo 2)	9.50	2.20	20.90	91.54	99.0%	0.21	0.92
⁽²⁾ Crushing Material (SCC 3-05-020-05) LG1 & LG2 - Secondary Crushing	DF02-4-A	Combined	9.50	0.039	0.37	1.62	3.71E-03	1.62E-02
⁽²⁾ Screening Material (SCC 3-05-020-021) LG1 & LG2 - Screening	DF02-4-A	Combined	9.50	0.30	2.85	12.48	2.85E-02	1.25E-01
⁽¹⁾ Conveying Material (SCC 3-05-016-05) PS1-PS5 (Pig Storage Hoppers)	CF3	Combined	9.50	2.20	20.90	91.54	0.21	0.92
	LSV1 (Lime Storage Vessels 1)	WB1	8.00	2.20	17.60	77.09	0.18	0.77
	LSV2 (Lime Storage Vessels 2)	DF02-2	8.00	2.20	17.60	77.09	0.18	0.77
	Whirlaire Flow Lime Blending Unit (BCL)	DF02-4-B	8.00	2.20	17.60	77.09	0.18	0.77
⁽¹⁾ Loading Material (SCC 3-05-016-26) Closed Vehicle Loading	DF02-4-B	8.00	0.61	4.88	21.37	99.0%	0.0488	0.21
Total Emissions				85.10	541.37		1.24	5.41

Methodology

Potential to Emit PM Emissions (lb/hr) = Operating Flow Rate (tons/hour) * Emission Factor (lbs of PM per ton of material processed)

Potential to Emit PM Emissions (tpy) = Controlled Potential PM Emissions (lb/hr) * ton/2000 lbs * 8760 hrs/yr

Controlled PM Emissions (lb/hr) = Potential to Emit PM Emissions (lb/hr) * (1-efficiency)

Controlled PM Emissions (tpy) = Potential to Emit PM Emissions (tpy) * (1-efficiency)

⁽¹⁾ Emission Factors from AP 42, Chapter 11.17 Fifth Edition, 1998 (Table 11.17-4)

⁽²⁾ Emission Factors from AP 42, Chapter 11.19.2 Fifth Edition, Updated August 2004 (Table 11.19.2-2) referred to by AP-42 Chapter 11.17 as more recent and representative for crushing, grinding and screening operations.

**Appendix A: Emissions Calculations
PM10 Emission Calculation**

Company Name: Magnesium Technologies Corp., d/b/a Rossbrough
Address City IN Zip: 205 State Road 104
Permit Number: 141-28820-00185
Pit ID: 141-00185
Reviewer: Bruce Farrar
Date: December 28, 2009

Emission Unit ID (Process Description)	Control Device	Capacity (tons processed per hour)	Emission Factor (lbs of PM10* per ton of material)	Potential to Emit PM10* (lbs/hr)	Potential to Emit PM10* (tons/year)	Control Efficiency (%)	Controlled PM10* Emissions (lb/hr)	Controlled PM10* Emissions (tons/year)
⁽¹⁾ Unloading Material (SCC 3-05-016-15) S1 (Lime Storage Silo 1) S2 (Lime Storage Silo 2)	CF1	4.75	2.20	10.45	45.77	99.0%	0.10	0.46
	CF2	4.75	2.20	10.45	45.77	99.0%	0.10	0.46
⁽²⁾ Crushing Material (SCC 3-05-020-05) LG1 & LG2 - Fine Crushing	DF02-4-A	Combined	9.50	0.015	0.14	99.0%	1.43E-03	6.24E-03
⁽²⁾ Screening Material (SCC 3-05-020-021) LG1 & LG2 - Screening	DF02-4-A	Combined	9.50	0.072	0.68	99.0%	6.84E-03	3.00E-02
⁽¹⁾ Conveying Material (SCC 3-05-016-05) PS1-PS5 (Pig Storage Hoppers) LSV1 (Lime Storage Vessels 1) LSV2 (Lime Storage Vessels 2) Whirlaire Flow Lime Blending Unit (BCL)	CF3	Combined	9.50	2.20	20.90	99.0%	0.21	0.92
	WB1		4.00	2.20	8.80	99.0%	0.09	0.39
	DF02-2		4.00	2.20	8.80	99.0%	0.09	0.39
	DF02-4-B		8.00	2.20	17.60	99.0%	0.18	0.77
⁽¹⁾ Loading Material (SCC 3-05-016-26) Closed Vehicle Loading	DF02-4-B		8.00	0.61	4.88	99.0%	0.0488	0.21
Total Emissions				63.46	277.94		0.63	3.62

Methodology

Where specific emission factors for PM10 were not available, PM10 assumed to be equal to PM.
 Potential to Emit PM-10 Emissions (lb/hr) = Operating Flow Rate (tons/hour) * Emission Factor (lbs of PM-10 per ton of material processed)
 Potential to Emit PM-10 Emissions (tpy) = Controlled Potential PM-10 Emissions (lb/hr) * ton/2000 lbs * 8760 hrs/yr
 Controlled PM-10 Emissions (lb/hr) = Potential to Emit PM-10 Emissions (lb/hr) * (1-efficiency)
 Controlled PM-10 Emissions (tpy) = Potential to Emit PM-10 Emissions (tpy) * (1-efficiency)

⁽¹⁾ Emission Factors from AP 42, Chapter 11.17 Fifth Edition, 1998 (Table 11.17-4)

⁽²⁾ Emission Factors from AP 42, Chapter 11.19.2 Fifth Edition, Updated August 2004 (Table 11.19.2-2) referred to by AP-42 Chapter 11.17 as more recent and representative for crushing, grinding and screening operations.

* Assume PM10 = PM2.5

Appendix A: Emissions Calculations
Magnesium Grinding Line Emission Calculation

Company Name: Magnesium Technologies Corp., d/b/a Rossbrough
Address City IN Zip: 205 State Road 104
Permit Number: 141-28820-00185
Plt ID: 141-00185
Reviewer: Bruce Farrar
Date: December 28, 2009

Emission Unit / Description	Annual Operating Hours	Capacity (pounds per hour)	Cyclone Efficiency (%)	Potential PM* Emissions (lb/hr)	Potential PM* Emissions (tpy)
MgL1	8760	1000	99.90%	1.00	4.38
MgL2	8760	1000	99.90%	1.00	4.38
MgL3	8760	1000	99.90%	1.00	4.38
Total Potential to Emit				3.00	13.14

Cyclones are integral to process. Therefore, the Potential to Emit is calculated after control efficiency.

Methodology

Potential PM (lb/hr) = Capacity (tons/hour) * (1-Efficiency of Cyclones)
 Potential PM (tpy) = Potential PM (tpy) * 8760 (hrs/yr) / 2000 (lbs/tons)

* Assume PM = PM10 and PM2.5



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: James E Kudla
Magnesium Technologies Corp., d/b/a Rossborough
205 SR 104, PO Box 175
Walkerton, IN 46574-0175

DATE: April 14, 2010

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

SUBJECT: Final Decision
FESOP
141-28820-00185

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:
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

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Toll Free (800) 451-6027
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April 14, 2010

TO: Walkerton Public Library

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

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

Applicant Name: Magnesium Technologies Corp., d/b/a Rossborough
Permit Number: 141-28820-00185

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	CDENNY 4/14/2010 Magnesium Technologies Corp., d/b/a Rossborough 141-28820-00185 (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		James E Kudla Magnesium Technologies Corp., d/b/a Rossborough 205 SR 104, PO Box 175 Walkerton IN 46574-0175 (Source CAATS)										
2		Dave Hostetler GM Magnesium Technologies Corp., d/b/a Rossborough 205 SR 104, PO Box 175 Walkerton IN 46574-0175 (RO CAATS)										
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
4		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
5		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 (Affected Party)										
6		Walkerton Lincoln Twp Public Library 607 Roosevelt Rd Walkerton IN 46574-1296 (Library)										
7		Walkerton Town Council 510 Roosevelt Rd. Walkerton IN 56574 (Local Official)										
8		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 (Local Official)										
9		St. Joseph County Health Department 227 W Jefferson Blvd, Room 825 South Bend IN 46601-1870 (Health Department)										
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