



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: November 30, 2010

RE: Republic Engineered Products / 089-29324-00157

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**

**Republic Engineered Products
2800 E. Dunes Hwy
Gary, Indiana 46402**

(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.: F089-29324-00157	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 30, 2010 Expiration Date: November 30, 2020

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary steel bar cold finishing plant.

Source Address:	2800 E. Dunes Hwy, Gary, Indiana 46402
General Source Phone Number:	(219) 886-8151
SIC Code:	3316
County Location:	Lake
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) Two (2) natural gas fueled annealing furnaces with uncontrolled emissions:

- (1) Annealing furnace AF7187 has a maximum capacity of 6.5 million (MM) Btu per hour, constructed in 2001, exhausting to the atmosphere through a roof vent by an exhaust fan.
- (2) Annealing furnace AF9800 has a maximum capacity of 15 MMBtu per hour, constructed in 2001. AF9800 has eight (8) combustion zones, four (4) venting to the atmosphere and four (4) exhausting inside the building.

A third annealing furnace is fueled by electricity, constructed in 2001 and has a maximum capacity of 1.6 MMBtu per hour. There are no regulated air emissions from this third annealing furnace (electric).

(b) Three (3) enclosed shotblasters, identified as Multiblaster #1, Wheelbrator Skew Roll Shotblaster #2 and Pangborn Shotblaster #3. These enclosed shotblasters are used to mechanically clean the bars and remove the outer scales developed during annealing.

- (1) The Multiblaster #1 has a maximum capacity to clean 14,760 pounds of steel per hour.
- (2) The Wheelbrator Skew Roll Shotblaster #2 has a maximum capacity to clean 9,520 pounds of steel per hour.

The particulate emissions from the Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2 are controlled by an ultra web baghouse (identified as Torit 4-32), with specifications of 11,750 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust into the building.

- (3) The Pangborn Shotblaster #3 has a maximum capacity to clean 9,520 pounds of steel per hour.

The particulate emissions from the Pangborn Shotblaster #3 are controlled by an ultra web baghouse (identified as Torit 2-8), with specifications of 2,700 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust through a stack identified as Stack T2-8, horizontally from the east side of the building.

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

This stationary source also includes the following insignificant activities:

- (a) Fourteen (14) natural gas fueled space heaters, with a total capacity of 7.657 MM Btu per hour.
- (b) One (1) above ground fixed dome roof, 275-gallon tank that stores diesel fuel, having a diesel fuel usage of less than 1,000 gallons per year.
- (c) Source's roads and parking lot.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F089-29324-00157, is issued for a fixed term of ten (10) 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:

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 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 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).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The 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, or Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

- (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 F089-29324-00157 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 from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), 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 two hundred and fifty (250) 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 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 twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

The Permittee shall not operate an incinerator 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 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).

- (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 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) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 Continuous Compliance Plan [326 IAC 6.8-8-1] [326 IAC 6.8-8-8]

- (a) Pursuant to 326 IAC 326 IAC 6.8-8-1, the Permittee shall submit to IDEM and maintain at source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the inspections, monitoring and record keeping in accordance with the information in 326 IAC 6.8-8-5 through 326 IAC 6.8-8-7 or applicable procedures in the CCP.
- (b) Pursuant to 326 IAC 6.8-8-8, the Permittee shall update the CCP, as needed, retain a copy of any changes and updates to the CCP at the source and make the updated CCP available for inspection by the department. The Permittee shall submit the updated CCP, if required to IDEM, OAQ within thirty (30) days of the update.
- (c) Pursuant to 326 IAC 6.8-8, failure to submit a CCP, maintain all information required by the CCP at the source, or submit update to a CCP is a violation of 326 IAC 6.8-8.

C.11 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.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) 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) Two (2) natural gas fueled annealing furnaces with uncontrolled emissions:
- (1) Annealing furnace AF7187 has a maximum capacity of 6.5 million (MM) Btu per hour, constructed in 2001, exhausting to the atmosphere through a roof vent by an exhaust fan.
 - (2) Annealing furnace AF9800 has a maximum capacity of 15 MMBtu per hour, constructed in 2001. AF9800 has eight (8) combustion zones, four (4) venting to the atmosphere and four (4) exhausting inside the building.
- A third annealing furnace is fueled by electricity, constructed in 2001 and has a maximum capacity of 1.6 MMBtu per hour. There are no regulated air emissions from this third annealing furnace (electric).
- (b) Three (3) enclosed shotblasters, identified as Multiblaster #1, Wheelbrator Skew Roll Shotblaster #2 and Pangborn Shotblaster #3. These enclosed shotblasters are used to mechanically clean the bars and remove the outer scales developed during annealing.
- (1) The Multiblaster #1 has a maximum capacity to clean 14,760 pounds of steel per hour.
 - (2) The Wheelbrator Skew Roll Shotblaster #2 has a maximum capacity to clean 9,520 pounds of steel per hour.
- The particulate emissions from the Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2 are controlled by an ultra web baghouse (identified as Torit 4-32), with specifications of 11,750 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust into the building.
- (3) The Pangborn Shotblaster #3 has a maximum capacity to clean 9,520 pounds of steel per hour.
- The particulate emissions from the Pangborn Shotblaster #3 are controlled by an ultra web baghouse (identified as Torit 2-8), with specifications of 2,700 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust through a stack identified as Stack T2-8, horizontally from the east side of the building.

(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 Matter (PM) Limit [326 IAC 6.8-1-2]

- (a) Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations For Lake County), the particulate matter (PM) emissions from the 2 annealing furnaces shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.
- (b) Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations For Lake County), the particulate matter (PM) emissions from the Torit 4-32 baghouse, controlling the

Multiblaster #1 and the Wheelbrator Skew Roll Shotblaster #2, shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

- (c) Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations For Lake County), the particulate matter (PM) emissions from Torit 2-8 baghouse, controlling the Pangborn Shotblaster #3, shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

D.1.2 Particulate Matter (PM) PSD Minor Limit [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable:

- (a) The PM emissions from the Torit 4-32 baghouse, controlling the emissions from Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2, shall not exceed 3.0 pounds of PM per hour.
- (b) The PM emission from the Torit 2-8 baghouse, controlling the emissions from Pangborn Shotblaster #3, shall not exceed 1.0 pound of PM per hour.

Compliance with the above limit shall limit the PM from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 Particulate Matter less than 10 microns (PM₁₀) and Particulate Matter less than 2.5 microns (PM_{2.5}) [326 IAC 2-1.1-5] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit):

- (a) PM₁₀ emissions from the Torit 4-32 baghouse, controlling the emissions from Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2, shall not exceed 3.0 pounds of PM₁₀ per hour.
- (b) PM_{2.5} emissions from the Torit 4-32 baghouse, controlling the emissions from Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2, shall not exceed 3.0 pounds PM_{2.5} per hour.
- (c) PM₁₀ emissions from the Torit 2-8 baghouse, controlling the emissions from Pangborn Shotblaster #3, shall not exceed 1.0 pound of PM₁₀ per hour.
- (d) PM_{2.5} emissions from the Torit 2-8 baghouse, controlling the emissions from Pangborn Shotblaster #3, shall not exceed 1.0 pound of PM_{2.5} per hour.

Compliance with the above limits shall limit the PM₁₀ and PM_{2.5} from the entire source to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 2-1.1-5 (Nonattainment NSR) 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable.

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

A Preventive Maintenance Plan is required for the baghouses. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Particulate Control

In order to comply with Conditions D.1.1, D.1.2 and D.1.3, the baghouses, identified as Torit 4-32 and Torit 2-8, for particulate control, shall be in operation and control emissions from the three (3) enclosed shotblasters at all times that the three (3) enclosed shotblasters are in operation.

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.1.1 and D.1.2, the Permittee shall perform rotating PM testing of one (1) of the two (2) baghouses (identified as Torit 4-32 and Torit 2-8) controlling the shotblasters as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

- (b) In order to demonstrate compliance with Conditions D.1.3, the Permittee shall perform rotating PM₁₀ and PM_{2.5} testing of one (1) of the two (2) baghouses (identified as Torit 4-32 and Torit 2-8) controlling the shotblasters no later than 180 days after promulgation of the new or revised condensable PM test method(s) referenced in the U.S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM_{2.5}), signed on May 8th, 2008 or not later than five (5) years from the date of the most recent valid compliance demonstration, whichever is later. This testing shall be conducted utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM₁₀ and PM_{2.5} includes filterable and condensable PM.

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

D.1.7 Visible Emissions Notations [326 IAC 2-8]

- (a) Daily visible emission notations of the baghouse stack (identified as Stack T2-8) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.8 Baghouse Parametric Monitoring [326 IAC 2-8]

- (a) The Permittee shall record the pressure drop across the baghouse, identified as Torit 4-32, used in conjunction with Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2, at least once per day when the Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2 are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.00 and 8.00 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances

contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (b) The Permittee shall record the pressure drop across the baghouse, identified as Torit 2-8, used in conjunction with Pangborn Shotblaster #3, at least once per day when the Pangborn Shotblaster #3, is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.00 and 8.00 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (c) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months or replaced at least once every six (6) months

D.1.9 Broken or Failed Bag Detection [326 IAC 2-8]

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

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

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

D.1.10 Record Keeping Requirements [326 IAC 2-8]

- (a) To document the compliance status with Condition D.1.7 the Permittee shall maintain daily records of the visible emission notations of the baghouse 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 a visible emission notation, (i.e. the process did not operate that day).
- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the pressure drop across the baghouses controlling the Multiblaster #1, Wheelbrator Skew Roll Shotblaster #2, and Pangborn Shotblaster #3. 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, (i.e. 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.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (b) One (1) above ground fixed dome roof, 275-gallon tank that stores diesel fuel, having a diesel fuel usage of less than 1,000 gallons per year.

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

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

D.2.1 Vessel Record Keeping [326 IAC 8-9-6(b)]

- (a) Pursuant to 326 IAC 8-9-6(b), the Permittee shall maintain a record containing the following information for each vessel:
- (i) the vessel identification number
 - (ii) the vessel dimensions and
 - (iii) the vessel capacity
- (b) Pursuant to 326 IAC 8-9-6(a), the record shall be maintained for the life of the vessel.

D.2.2 Vessel Record Reporting [326 IAC 8-9-6(a)]

Pursuant to 326 IAC 8-9-6(a), the Permittee shall submit a report containing the information in Condition D.2.1 - Vessel Record Keeping, to the address listed in Section C - General Reporting Requirements, of this permit using the reporting form at the end of this permit or its equivalent.

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

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

Source Name: Republic Engineered Products
Source Address: 2800 E. Dunes Hwy, Gary, Indiana 46402
FESOP Permit No.: F089-29324-00157

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: Republic Engineered Products
Source Address: 2800 E. Dunes Hwy, Gary, Indiana 46402
FESOP Permit No.: F089-29324-00157

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**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: Republic Engineered Products
Source Address: 2800 E. Dunes Hwy, Gary, Indiana 46402
FESOP Permit No.: F089-29324-00157

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Republic Engineered Products Inc.
Source Location:	2800 East Dunes Highway, Gary, IN 46402
County:	Lake
SIC Code:	3316
Permit Renewal No.:	F089-29324-00157
Permit Reviewer:	Bruce Farrar

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Republic Engineered Products Inc. relating to the operation of a cold steel bar finishing plant. On June 2, 2010, Republic Engineered Products Inc. submitted an application to the OAQ requesting to renew its operating permit. Republic Engineered Products Inc. was issued a FESOP (F 089-17924-00157) on March 10, 2006.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) Two (2) natural gas fueled annealing furnaces with uncontrolled emissions:
 - (1) Annealing furnace AF7187 has a maximum capacity of 6.5 million (MM) Btu per hour, constructed in 2001, exhausting to the atmosphere through a roof vent by an exhaust fan.
 - (2) Annealing furnace AF9800 has a maximum capacity of 15 MMBtu per hour, constructed in 2001. AF9800 has eight (8) combustion zones, four (4) venting to the atmosphere and four (4) exhausting inside the building.

A third annealing furnace is fueled by electricity, constructed in 2001 and has a maximum capacity of 1.6 MMBtu per hour. There are no regulated air emissions from this third annealing furnace (electric).

- (b) Three (3) enclosed shotblasters, identified as Multiblaster #1, Wheelbrator Skew Roll Shotblaster #2 and Pangborn Shotblaster #3. These enclosed shotblasters are used to mechanically clean the bars and remove the outer scales developed during annealing.
 - (1) The Multiblaster #1 has a maximum capacity to clean 14,760 pounds of steel per hour.
 - (2) The Wheelbrator Skew Roll Shotblaster #2 has a maximum capacity to clean 9,520 pounds of steel per hour.

The particulate emissions from the Multiblaster #1 and Wheelbrator Skew Roll Shotblaster #2 are controlled by an ultra web baghouse (identified as Torit 4-32), with specifications of 11,750 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust into the building.

- (3) The Pangborn Shotblaster #3 has a maximum capacity to clean 9,520 pounds of steel per hour.

The particulate emissions from the Pangborn Shotblaster #3 are controlled by an ultra web baghouse (identified as Torit 2-8), with specifications of 2,700 acf/min and 0.03 gr/scf. Controlled emissions from this baghouse exhaust through a stack identified as Stack T2-8, horizontally from the east side of the building.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Fourteen (14) natural gas fueled space heaters, with a total capacity of 7.657 MM Btu per hour.
- (b) One (1) above ground fixed dome roof, 275-gallon tank that stores diesel fuel, having a diesel fuel usage of less than 1,000 gallons per year.
- (c) Source's roads and parking lot.

Existing Approvals

Since the issuance of the FESOP (089-17924-00157) on March 10, 2006, the source has constructed or has been operating under the following additional approval:

Administrative Amendment No. 089-28070-00157 issued on August 7, 2009.

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

Enforcement Issue

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 Lake County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	Attainment effective June 4, 2010. ¹
PM ₁₀	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
<p>¹The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3.</p> <p>Basic nonattainment designation effective federally April 5, 2005, for PM_{2.5}.</p>	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Lake 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) **PM_{2.5}**
 U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

- (c) **Other Criteria Pollutants**
 Lake 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.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	>250
PM₁₀⁽¹⁾	>250
PM_{2.5}	>250
SO₂	0.08
VOC	0.70
CO	10.75
NO_x	12.79
Single HAP	0.23
Total HAP	0.24

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	tons/year
Hexane	0.23
Benzene	negl.
Toluene	negl.
Total	0.24

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 PM is greater than 250 tons per year. However, the Permittee has agreed to limit the source's PM emissions to less than 250 tons per year and renders 326 IAC 2-2 not applicable.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of Particulate (PM10/PM2.5) is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's Particulate (PM10/PM2.5) emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (c) 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.
- (d) 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.

Actual Emissions

The following table shows the actual emissions as reported by the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	-
PM ₁₀	1
SO ₂	0
VOC	0
CO	2
NO _x	3
HAP (specify)	-

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas Combustion	0.24	0.97	0.97	0.08	12.79	0.70	10.75	0.24	0.23 Hexane
Multiblaster #1 and #2	13.23	13.23	13.23	-	-	-	-	-	-
Pangborn #3	4.22	4.22	4.22	-	-	-	-	-	-
Fugitive Emissions	1.5	1.5	1.5	-	-	-	-	-	-
Total PTE of Entire Source	19.20	19.93	19.93	0.08	12.79	0.70	10.75	<25	<10
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA

negl. = negligible

Assume PM10 = PM2.5

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

PM, PM10 and PM2.5 - Uncontrolled potential PM, PM10 and PM2.5 are each greater than 250 tons per 12 consecutive month period. However, by complying with the limits of 326 IAC 6.8-1-2(a), which requires operating the control devices for the Multiblaster #1 and #2 and Pangborn #3 at all times that the facilities are in operation, the source shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-1.1-5 (Air Quality Requirements) not applicable.

Federal Rule Applicability

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

NSPS and NESHAP

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, (40 CFR 63.11169, Subpart HHHHHH (6H)), are not included revision, because the source does not perform paint stripping using paint strippers that contain methylene chloride (MeCl), performs autobody refinishing operations, or has spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 6311514, Subpart XXXXXX (6X)), are not included, because this source's SIC is not listed.
- (e) 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

- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.
- (b) 326 IAC 2-2 Prevention of Significant Deterioration (PSD)
The emissions after control of particulate matter (PM) and particulate matter with an aerodynamic diameter of less than or equal to 10 micrometers (PM₁₀) are limited to less than 250 tons/year; therefore the PSD requirements do not apply.
- (c) 326 IAC 2-6 (Emission Reporting)
This source is located in Lake County, but its emissions of VOC and NO_x are less than 25 tons per year. Therefore this source is not subject to 326 IAC 2-6 (Emission Reporting).
- (d) 326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2)(B).
- (e) 326 IAC 6.5 (PM Limitations Except Lake County)
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.
- (f) 326 IAC 6.8 (PM Limitations for Lake County)
This source is subject to 326 IAC 6.8 because it is located in Lake County, its PM PTE is equal to or greater than 100 tons/year or actual emissions are greater than 10 tons/year. However, this source is not one of the sources specifically listed in 326 IAC 6.8-2. Therefore, 326 IAC 6.8-1-2(a) applies. Each PM emitting units will be subject to this rule.
- (g) 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)
The source is not subject to the requirements of 326 IAC 6.8-10, because the source has potential fugitive particulate emissions less than 5 tons per year.

State Rule Applicability – Individual Facilities

Annealing Furnaces

- (h) 326 IAC 6.8-6-1 (Lake County: Combustion Sources: Natural Gas)
The annealing units were initially subject to 326 IAC 6.8-6-1. However, this rule was repealed on January 23, 2008, therefore, the annealing furnaces are no longer subject to this rule.

- (i) 326 IAC 6.8-1 (Particulate Matter Limitations for Lake County)
The source is located in Lake County, but is not specifically listed in 326 IAC 6.8-2. Pursuant to 326 IAC 6.8-1-2(a), the potential particulate emissions are greater than one hundred (100) tons per year or actual emissions are over ten (10) tons per year, therefore the requirements of 326 IAC 6.8-1-2(a) apply. Particulate matter emissions from the annealing furnaces shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

- (j) 326 IAC 6.8-1-2(e) (PM Limitations for Lake County)
The annealing furnaces are not subject to 326 IAC 6.8-1-2(e), because Republic Engineered Products is not a gray iron foundry.

- (k) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
These emission units are not subject to 326 IAC 7-1.1 because its SO₂ PTE (or limited SO₂ PTE) is less than 25 tons/year or 10 pounds/hour.

With the repeal of 326 IAC 6.8-6-1, the annealing furnaces are now subject to 326 IAC 6.8-1. Therefore the annealing furnace section D has been removed. The annealing furnaces requirements under 326 IAC 6.8-1 have been added to section D.1.

Multiblaster #1, Wheelbrator Skew Roll Shotblaster #2 and Pangborn Shotblaster #3.

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(c)(3) (Particulate Emission Limitations for Manufacturing Processes), these emission units are not subject to this rule because 326 IAC 6.8-1 applies.

- (l) 326 IAC 6.8-1 (Particulate Matter Limitations for Lake County)
The source is located in Lake County, but is not specifically listed in 326 IAC 6.8-2. Pursuant to 326 IAC 6.8-1-2(a), the potential particulate emissions are greater than one hundred (100) tons per year or actual emissions are over ten (10) tons per year, therefore the requirements of 326 IAC 6.8-1-2(a) apply. Particulate matter emissions from the Multiblaster #1, Wheelbrator Skew Roll Shotblaster #2 and Pangborn Shotblaster #3 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

- (m) 326 IAC 8
There are no VOC 326 IAC 8 rules apply because VOC emissions are less than 15 pounds per day.

Diesel Fuel Storage Tank

- (n) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The fuel storage tank is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from fuel storage tank is less than twenty-five (25) tons per year.

- (o) 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)
 The fuel storage tank is not subject to the requirements of 326 IAC 8-4-3 because it is not a petroleum liquid storage vessel with capacities greater than thirty-nine thousand (39,000) gallons.
- (p) 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)
 This station source is located in Lake County and the fuel storage tank has a capacity of less than thirty-nine thousand (39,000) gallons. Pursuant to 326 IAC 8-9-1(b), the fuel storage tank is subject to reporting and recordkeeping provisions of section 6(a) and 6(b) of this rule and are exempt from all other provisions of this rule.

Pursuant to 326 IAC 8-9-6(b), the Permittee shall maintain a record and submit to IDEM, OAQ a report containing the following information for the fuel storage tank:

- (1) the tank identification number;
- (2) the tank dimensions; and
- (3) the tank capacity.

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.

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse, Torit 4-32	Water Pressure Drop	Daily	2.0 and 8.0 inches	Response Steps
Baghouse, Torit 2-8	Water Pressure Drop	Daily	2.0 and 8.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

These monitoring conditions are necessary because the baghouses for the shotblasters, identified as Multiblaster #1, Wheelbrator Skew Roll Shotblaster #2 and Pangborn Shotblaster #3 must operate properly to ensure compliance with 326 IAC 6-8.1 (Particulate Matter Limitations for Lake County) and 326 IAC 2-8 (FESOP).

- (b) The testing requirements applicable to this source are as follows:

- (1) In order to demonstrate compliance with PSD minor limits, the Permittee shall perform rotating PM testing of one (1) of the two (2) baghouses (identified as Torit 4-32 and Torit 2-8) controlling the shotblasters as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).
- (2) In order to demonstrate compliance with FESOP, PSD minor limits and nonattainment NSR, the Permittee shall perform rotating PM₁₀ and PM_{2.5} testing of one (1) of the two (2) baghouses (identified as Torit 4-32 and Torit 2-8) controlling the shotblasters no later than 180 days after promulgation of the new or revised condensable PM test method(s) referenced in the U.S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM_{2.5}), signed on May 8th, 2008 or not later than five (5) years from the date of the most recent valid compliance demonstration, whichever is later. This testing shall be conducted utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

The source conducted a stack test for PM and PM₁₀ on November 18, 2009 on the Torbit 2-8 baghouse. The results were in compliance.

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 June 2, 2010.

Conclusion

The operation of this stationary steel bar cold finishing plant shall be subject to the conditions of the attached FESOP Renewal No. 089-29324-00157.

IDEM Contact

- (a) Questions regarding this proposed permit 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 findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emissions Calculations
PM/PM10 for Shotblasters**

Company Name: Republic Engineered Products
Address City IN Zip: 2800 E. Dunes Hwy, Gary, IN 46402
Permit Number: F087-29324-00157
Plt ID: 089-00157
Reviewer: Bruce Farrar
Date: June 2, 2010

Emission Unit	Grain Loading (gr/scf)	Flow Rate (acfm)	E before Cont (tons/year)	PTE After Controls (tons/year)
Multiblaster #1	0.03	11,750	13,233.86	13.23
Multiblaster #2				
Pangborn #3	0.03	3,750	4,223.57	4.22
Total Particulate			17,457.43	17.46

Assume PM = PM10 and PM2.5

Methodology:

PM/PM10 after control = (gr/scf) * (acfm) * (1 lb/7000 grains) * (60 minute/ 1 hour) * (8760 hours/1 year) * (1 ton/2000 lbs)

PM/PM10 before control = ((gr/scf) * (acfm) * (1 lb/7000 grains) * (60 minute/ 1 hour) * (8760 hours/1 year) * (1 ton/2000 lbs)) / (1 - Control efficiency %)

Appendix A: Emission Calculations

Company Name: Republic Engineered Products
Address City IN Zip: 2800 E. Dunes Hwy, Gary, IN 46402
Permit Number: F087-29324-00157
Plant ID: 089-00157
Reviewer: Bruce Farrar
Date: June 2, 2010

Uncontrolled Potential to Emit (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Shotblasters	Fugitive* Emissions	TOTAL
PM	0.24	>250	1.50	>250
PM10	0.97		1.50	
PM2.5	0.97		1.50	
SO ₂	0.08	-		0.08
NO _x	12.79	-		12.79
VOC	0.70	-		0.70
CO	10.75	-		10.75
total HAPs	0.24	-		0.24
worst case single HAP	0.23 Hexane	-		-

Total emissions based on rated capacity at 8,760 hours per year.

Limited Potential to Emit (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Shotblasters	Fugitive* Emissions	TOTAL
PM	0.24	17.46	1.50	19.20
PM10	0.97	17.46	1.50	19.93
PM2.5	0.97	17.46	1.50	19.93
SO ₂	0.08	-		0.08
NO _x	12.79	-		12.79
VOC	0.70	-		0.70
CO	10.75	-		10.75
total HAPs	0.24	-		0.24
worst case single HAP	0.23 Hexane	-		-

* Fugitive Emissions from IDEM, OAQ permit 089-17924-00157, issued March 10, 2006

Total emissions based on rated capacity at 8,760 hours per year.

Appendix A: Emissions Calculations
Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Republic Engineered Products
Address City IN Zip: 2800 E. Dunes Hwy, Gary, IN 46402
Permit Number: F087-29324-00157
Plt ID: 089-00157
Reviewer: Bruce Farrar
Date: June 2, 2010

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Unit Description
6.5	56.94	Annealing furnace AF7187
15	131.40	Annealing furnace AF9800
1.88	16.47	2 Space Heaters rated at 0.94 MMBtu, each
2.184	19.13	7 Space Heaters rated at 0.312 MMBtu, each
2.343	20.52	3 Space Heaters rated at 0.781 MMBtu each
1.3	11.39	2 Space Heaters rated at 0.625 MMBtu, each
29.2	255.9	

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.24	0.97	0.08	12.79	0.70	10.75

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Republic Engineered Products

Address City IN Zip: 2800 E. Dunes Hwy, Gary, IN 46402

Permit Number: F087-29324-00157

Plt ID: 089-00157

Reviewer: Bruce Farrar

Date: June 2, 2010

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenz 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.686E-04	1.535E-04	9.594E-03	0.23	4.350E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.396E-05	1.407E-04	1.791E-04	4.861E-05	2.686E-04

Methodology is the same as page 2.

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



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: Mark Frahm
Republic Engineered Products, LLC - Gary Dunes Pla
2800 E Dunes Hwy
Gary, IN 46402

DATE: November 30, 2010

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

SUBJECT: Final Decision
FESOP
089-29324-00157

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
www.idem.IN.gov

November 30, 2010

TO: Gary Public Library

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

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

Applicant Name: Republic Engineered Products
Permit Number: 089-29324-00157

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 11/30/2010 Republic Engineered Products, LLC - Gary Dunes Plant 089-29324-00157 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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2		Plant Mgr Plant Mgr Republic Engineered Products, LLC - Gary Dunes Pla 2800 E Dunes Hwy Gary IN 46402 (RO CAATS)										
3		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
4		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
5		Gary Mayors Office 401 Broadway # 203 Gary IN 46402 (Local Official)										
6		Gary Public Library 220 W 5th Avenue Gary IN 46402 (Library)										
7		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
8		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
9		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
10		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
11		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
12		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 (Affected Party)										
13		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
14		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
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2		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										
3		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										
4		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										
5		Calumet Township Trustee 31 E 5th Avenue Gary IN 46402 (Affected Party)										
6		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
7		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
8		Doreen Carey Gary Dept. of Environmental Affairs 839 Broadway N206 Gary IN 46402 (Local Official)										
9		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)										
10		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 (Affected Party)										
11		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 (Local Official)										
12		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
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