



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: August 11, 2011

RE: National Processing Company / 089-29878-00384

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, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

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

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

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

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

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

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

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

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

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



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**National Processing Company
4506 W. Cline Ave.
East Chicago, Indiana 46312**

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

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

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

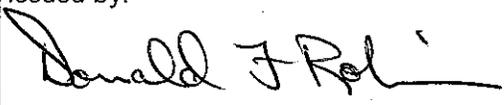
Operation Permit No.: T089-29878-00384	
Issued by:  Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 11, 2011 Expiration Date: August 11, 2016

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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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary coil steel pickling line and steel cutting operation.

Source Address:	4506 W. Cline Ave., East Chicago, Indiana 46312
General Source Phone Number:	(219) 391-6012
SIC Code:	3316
County Location:	Lake
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Nonattainment NSR Rules Major 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 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) One (1) coil steel pickling line, installed in 1982, with a maximum pickling throughput of 250,000 pounds of steel coils per hour, with hydrochloric acid emissions controlled by a wet scrubber, with a maximum flow rate of 7950 actual cubic feet per minute (acfm), exhausting to stack S1, consisting of:

- (1) one (1) wash tank, with a surface area of 7.5 ft by 8.3 ft
- (2) three (3) pickling tanks (1-3), each with a corresponding recirculation tank and a surface area of 50 ft by 8.3 ft
- (3) one (1) four-stage rinse tank system
- (4) one (1) roll oil coating operation
- (5) one (1) roll soap coating operation

Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.

- (b) Two (2) storage vessels, installed in 1982, containing hydrochloric acid, with a capacity of 24,100 gallons each. Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.
- (c) Three (3) storage vessels, installed in 1982, containing spent acid, with a total combined

capacity of 33,000 gallons. Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) Two (2) natural gas-fired boilers, identified as 1 and 2, with a heat input capacity of 0.64 MMBtu/hr each, built in 1982. [326 IAC 6.8-1-2]
- (b) Two (2) natural gas-fired comfort heating furnaces, identified as 3 and 4, with a heat input capacity of 1.925 MMBtu/hr each. [326 IAC 6.8-1-2]
- (c) One (1) natural gas-fired hot water heater, identified as 5, with a heat input capacity of 0.076 MMBtu/hr. [326 IAC 6.8-1-2]
- (d) One hundred thirty (130) natural gas-fired radiant space heaters, identified collectively as 6, with a heat input capacity of 0.1 MMBtu/hr each. [326 IAC 6.8-1-2]
- (e) Twenty seven (27) natural gas-fired radiant space heaters, identified collectively as 7, with a heat input capacity of 0.05 MMBtu/hr each. [326 IAC 6.8-1-2]
- (f) One (1) natural gas-fired comfort heating furnace, identified as 8, with a heat input capacity of 0.1 MMBtu/hr. [326 IAC 6.8-1-2]
- (g) One (1) natural gas-fired comfort heating furnace, identified as 9, with a heat input capacity of 0.12 MMBtu/hr. [326 IAC 6.8-1-2]
- (h) One (1) natural gas-fired hot water heater, identified as 10, with a heat input capacity of 0.04 MMBtu/hr. [326 IAC 6.8-1-2]
- (i) One (1) natural gas-fired hot water heater, identified as 11, with a heat input capacity of 0.034 MMBtu/hr. [326 IAC 6.8-1-2]
- (j) Welding facility, consisting of two (2) welding stations, using metal inert gas (MIG), with a maximum consumption of wire per station of 0.03 pounds per hour, six (6) welding stations using electrodes with a maximum consumption of electrodes per station of 0.05 pounds per hour and six (6) welding stations using oxyacetylene with a maximum metal consumption per station of 0.5 pounds per hour. [326 IAC 6.8-1-2]
- (k) Five (5) storage vessels, containing oil coating, with a capacity of 500 gallons each, installed in 1990.
- (l) Two (2) storage vessels, containing soap coating, with a capacity of 550 gallons and 600 gallons, respectively.
- (m) Two (2) storage vessels, containing caustic soda, with a capacity of 2500 gallons each.

- (n) One (1) storage vessel, containing diesel fuel, with a capacity of 500 gallons.
- (o) Paved roads.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T089-29878-00384, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
 - (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

and

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

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

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

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

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

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may

require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to T089-29878-00384 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b) or (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

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

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

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

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

The Permittee shall not operate an incinerator 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.4 Fugitive Dust Emissions [326 IAC 6-4]

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

C.5 Particulate Matter Contingency Measures [326 IAC 6.8-11]

The Permittee is subject to 326 IAC 6.8-11 (Lake County Particulate Matter Contingency Measures) and shall comply with 326 IAC 6.8-11-4, 326 IAC 6.8-11-5 and 326 IAC 6.8-11-6 (formerly 326 IAC 6-1-11.2(h), (i), (k), (l), (m), (o), (p) and (q) (Lake County Particulate Matter Contingency Measures) as required.

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

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

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

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three

(3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana 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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [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 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation 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 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

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

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner 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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (a) One (1) coil steel pickling line, installed in 1982, with a maximum pickling throughput of 250,000 pounds of steel coils per hour, with hydrochloric acid emissions controlled by a wet scrubber, with a maximum flow rate of 7950 actual cubic feet per minute (acfm), exhausting to stack S1 consisting of:
- (1) one (1) wash tank, with a surface area of 7.5 ft by 8.3 ft
 - (2) three (3) pickling tanks (1-3), each with a corresponding recirculation tank and a surface area of 50 ft by 8.3 ft
 - (3) one (1) four-stage rinse tank system
 - (4) one (1) roll oil coating operation
 - (5) one (1) roll soap coating operation

Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.

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

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

D.1.1 Particulate Matter (PM) [326 IAC 6.8-1-2]

Pursuant 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County), the particulate matter (PM) emissions from the Pickling Line shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

D.1.2 PSD and Nonattainment NSR Minor Limits (PM, PM10, PM2.5) [326 IAC 2-2] [326 IAC 2-1.1-5]

- (a) The PM emissions from the Pickling Line Operation shall not exceed 22.6 lb/hr.
- (b) The PM10 emissions from the Pickling Line Operation shall not exceed 22.6 lb/hr.
- (c) The PM2.5 emissions from the Pickling Line Operation shall not exceed 22.6 lb/hr.

Compliance with the above limits, combined with the potential to emit PM, PM10, and PM2.5 from other units at the source, shall limit PM and PM10 emissions from the entire source to less than two hundred-fifty (250) tons per twelve (12) consecutive month period each and shall limit PM2.5 emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) are not applicable to this source.

D.1.3 Volatile Organic Compound (VOC) [326 IAC 8-2-4]

Pursuant to 326 IAC 8-2-4(b), the Permittee shall not allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.6 pounds per gallon of coating, excluding water, as delivered to the coating applicator for the roll oil coating operation.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for this facility and any control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.5 Particulate Control

In order to comply with Conditions D.1.1 and D.1.2, the wet scrubber for particulate control shall be in operation and control emissions from the pickling line at all times the pickling line is in operation.

D.1.6 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.7 Visible Emissions Notations [40 CFR 64]

- (a) Daily visible emission notations of the pickling line stack exhaust (stack S1) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.8 Scrubber Monitoring Requirements [40 CFR 64]

The Permittee shall monitor continuously and record the pressure drop and the scrubber makeup water flow rate of the scrubber at least once per shift when the pickling line is in operation. When for any one reading, the pressure drop across the scrubber is outside the range established during the latest stack test, the Permittee shall take reasonable response steps. When for any one reading, the scrubber makeup water flow rate of the scrubber is less than the minimum established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. A pressure reading that is outside the above mentioned range or a scrubber makeup water flow rate that is below the above mentioned minimum is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.9 Scrubber Failure Detection [40 CFR 64]

In the event that a scrubber failure has been observed:

The feed to the process shall be shut down immediately until the failed units have been repaired or replaced. The emission units shall be shut down no later than the completion of the processing of the material in the emission 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). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation of this permit.

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

D.1.10 Record Keeping Requirements [40 CFR 63.1165]

- (a) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material used.
 - (2) The amount of coating material used on a monthly basis. Records may include, but are not limited to, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the pickling line stack exhaust (stack S1). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain records of the once per shift readings of pressure drop and scrubber makeup water flow rate for the scrubber. The Permittee shall include in its record when a pressure drop or flow rate is not taken and the reason for the lack of pressure drop or flow rate data (e.g. the process did not operate that shift).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

Insignificant Activities:

- (a) Two (2) natural gas-fired boilers, identified as 1 and 2, with a heat input capacity of 0.64 MMBtu/hr each, built in 1982. [326 IAC 6.8-1-2]
- (b) Two (2) natural gas-fired comfort heating furnaces, identified as 3 and 4, with a heat input capacity of 1.925 MMBtu/hr each. [326 IAC 6.8-1-2]
- (c) One (1) natural gas-fired hot water heater, identified as 5, with a heat input capacity of 0.076 MMBtu/hr. [326 IAC 6.8-1-2]
- (d) One hundred thirty (130) natural gas-fired radiant space heaters, identified collectively as 6, with a heat input capacity of 0.1 MMBtu/hr each. [326 IAC 6.8-1-2]
- (e) Twenty seven (27) natural gas-fired radiant space heaters, identified collectively as 7, with a heat input capacity of 0.05 MMBtu/hr each. [326 IAC 6.8-1-2]
- (f) One (1) natural gas-fired comfort heating furnace, identified as 8, with a heat input capacity of 0.1 MMBtu/hr. [326 IAC 6.8-1-2]
- (g) One (1) natural gas-fired comfort heating furnace, identified as 9, with a heat input capacity of 0.12 MMBtu/hr. [326 IAC 6.8-1-2]
- (h) One (1) natural gas-fired hot water heater, identified as 10, with a heat input capacity of 0.04 MMBtu/hr. [326 IAC 6.8-1-2]
- (i) One (1) natural gas-fired hot water heater, identified as 11, with a heat input capacity of 0.034 MMBtu/hr. [326 IAC 6.8-1-2]
- (j) Welding facility, consisting of two (2) welding stations, using metal inert gas (MIG), with a maximum consumption of wire per station of 0.03 pounds per hour, six (6) welding stations using electrodes with a maximum consumption of electrodes per station of 0.05 pounds per hour and six (6) welding stations using oxyacetylene with a maximum metal consumption per station of 0.5 pounds per hour. [326 IAC 6.8-1-2]

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

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

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6.8-1-2]

- (a) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter emissions from boilers 1 and 2 shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf) each.
- (b) Pursuant to 326 IAC 6.8-1-2(a), the particulate matter emissions from units 3 through 11 and the welding facility shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf) each.

SECTION E.1

FACILITY OPERATION CONDITIONS – NSPS TT

Facility Description [326 IAC 2-7-5(14)]:

(a)(4) one (1) roll oil coating operation

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to NSPS TT [326 IAC 12-1-1][40 CFR Part 63, Subpart A]

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

E.1.2 Standards of Performance for Metal Coil Surface Coating [40 CFR 60, Subpart TT][326 IAC 12]

The Permittee which performs metal coil surface coating is subject to the following provisions of 40 CFR 60, Subpart TT, which is incorporated by reference as 326 IAC 12 (included as Attachment A of the permit):

- (1) 40 CFR 60.460;
- (2) 40 CFR 60.461;
- (3) 40 CFR 60.462(a)(1);
- (4) 40 CFR 60.463(a), (b), (c)(1);
- (5) 40 CFR 60.464(a);
- (6) 40 CFR 60.465(a), (c), (e); and
- (7) 40 CFR 60.466(a)(1), (b), (d).

SECTION E.2

FACILITY OPERATION CONDITIONS – NESHAP CCC

Facility Description [326 IAC 2-7-5(14)]:

- (a) One (1) coil steel pickling line, installed in 1982, with a maximum pickling throughput of 250,000 pounds of steel coils per hour, with hydrochloric acid emissions controlled by a wet scrubber, with a maximum flow rate of 7950 actual cubic feet per minute (acfm), exhausting to stack S1 consisting of:
- (1) one (1) wash tank, with a surface area of 7.5 ft by 8.3 ft
 - (2) three (3) pickling tanks (1-3), each with a corresponding recirculation tank and a surface area of 50 ft by 8.3 ft
 - (3) one (1) four-stage rinse tank system
 - (4) one (1) roll oil coating operation
 - (5) one (1) roll soap coating operation
- Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.
- (b) Two (2) storage vessels, installed in 1982, containing hydrochloric acid, with a capacity of 24,100 gallons each. Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.
- (c) Three (3) storage vessels, installed in 1982, containing spent acid, with a total combined capacity of 33,000 gallons. Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.2.1 General Provisions Relating to NESHAP CCC [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, as specified in Table 1 of 40 CFR 63, Subpart CCC in accordance with the schedule in 40 CFR Part 63, Subpart CCC.

E.2.2 Steel Pickling NESHAP [40 CFR 63, Subpart CCC][326 IAC 20-29]

The Permittee, which performs steel pickling, is subject to the following provisions of 40 CFR 63, Subpart CCC, which is incorporated by reference as 326 IAC 20-29 (included as Attachment B of the permit):

- (1) 40 CFR 63.1155(a)(1), (b), (c);
- (2) 40 CFR 63.1156;
- (3) 40 CFR 63.1157(a);
- (4) 40 CFR 63.1159(b);
- (5) 40 CFR 63.1160(a)(1), (b)(1), (b)(2);
- (6) 40 CFR 63.1161(a), (b), (d);
- (7) 40 CFR 63.1162(a), (c);
- (8) 40 CFR 63.1163;

- (9) 40 CFR 63.1164;
- (10) 40 CFR 63.1165;
- (11) 40 CFR 63.1166; and
- (12) Table 1 of 40 CFR 63, Subpart CCC.

E.2.3 Testing Requirements [40 CFR 63, Subpart CCC] [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to comply with 40 CFR 63.1162(a)(1), the Permittee shall conduct performance tests to measure the HCl flows at the scrubber inlet and outlet or the concentration of HCl exiting the scrubber according to the procedures described in 40 CFR 63, Subpart CCC no later than two and a half (2.5) years from the date of the most recent performance test. Performance tests shall be repeated according to an alternative schedule approved by IDEM, OAQ, at least every two and a half (2.5) years from the date of the most recent performance test. 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.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: National Processing Company
Source Address: 4506 W. Cline Ave., East Chicago, Indiana 46312
Part 70 Permit No.: T089-29878-00384

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: National Processing Company
Source Address: 4506 W. Cline Ave., East Chicago, Indiana 46312
Part 70 Permit No.: T089-29878-00384

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: National Processing Company
Source Address: 4506 W. Cline Ave., East Chicago, Indiana 46312
Part 70 Permit No.: T089-29878-00384

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

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**Attachment A
to a Part 70 Operating Permit Renewal**

Source Background and Description

Source Name:	National Processing Company
Source Location:	4506 W. Cline Ave., East Chicago, Indiana 46312
County:	Lake
SIC Code:	3316
Permit Renewal No.:	T089-29878-00384

**Title 40: Protection of Environment
PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES**

Subpart TT—Standards of Performance for Metal Coil Surface Coating

Source: 47 FR 49612, Nov. 1, 1982, unless otherwise noted.

§ 60.460 Applicability and designation of affected facility.

(a) The provisions of this subpart apply to the following affected facilities in a metal coil surface coating operation: each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously.

(b) This subpart applies to any facility identified in paragraph (a) of this section that commences construction, modification, or reconstruction after January 5, 1981.

§ 60.461 Definitions.

(a) All terms used in this subpart not defined below are given the same meaning as in the Act or in subpart A of this part.

Coating means any organic material that is applied to the surface of metal coil.

Coating application station means that portion of the metal coil surface coating operation where the coating is applied to the surface of the metal coil. Included as part of the coating application station is the flashoff area between the coating application station and the curing oven.

Curing oven means the device that uses heat or radiation to dry or cure the coating applied to the metal coil.

Finish coat operation means the coating application station, curing oven, and quench station used to apply and dry or cure the final coating(s) on the surface of the metal coil. Where only a single coating is applied to the metal coil, that coating is considered a finish coat.

Metal coil surface coating operation means the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil.

Prime coat operation means the coating application station, curing oven, and quench station used to apply and dry or cure the initial coating(s) on the surface of the metal coil.

Quench station means that portion of the metal coil surface coating operation where the coated metal coil is cooled, usually by a water spray, after baking or curing.

VOC content means the quantity, in kilograms per liter of coating solids, of volatile organic compounds (VOC's) in a coating.

(b) All symbols used in this subpart not defined below are given the same meaning as in the Act and in subpart A of this part.

C_a = the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million by volume, as carbon).

C_b = the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon).

C_f = the VOC concentration in each gas stream emitted directly to the atmosphere (parts per million by volume, as carbon).

D_c = density of each coating, as received (kilograms per liter).

D_d = density of each VOC-solvent added to coatings (kilograms per liter).

D_r = density of VOC-solvent recovered by an emission control device (kilograms per liter).

E = VOC destruction efficiency of the control device (fraction).

F = the proportion of total VOC's emitted by an affected facility that enters the control device (fraction).

G = volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of coating solids applied (kilograms per liter).

L_c = the volume of each coating consumed, as received (liters).

L_d = the volume of each VOC-solvent added to coatings (liters).

L_r = the volume of VOC-solvent recovered by an emission control device (liters).

L_s = the volume of coating solids consumed (liters).

M_d = the mass of VOC-solvent added to coatings (kilograms).

M_o = the mass of VOC's in coatings consumed, as received (kilograms).

M_r = the mass of VOC's recovered by an emission control device (kilograms).

N= the volume-weighted average mass of VOC emissions to the atmosphere per unit volume of coating solids applied (kilograms per liter).

Q_a = the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour).

Q_b = the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour).

Q_f = the volumetric flow rate of each gas stream emitted directly to the atmosphere (dry standard cubic meters per hour).

R= the overall VOC emission reduction achieved for an affected facility (fraction).

S= the calculated monthly allowable emission limit (kilograms of VOC per liter of coating solids applied).

V_s = the proportion of solids in each coating, as received (fraction by volume).

W_o = the proportion of VOC's in each coating, as received (fraction by weight).

§ 60.462 Standards for volatile organic compounds.

(a) On and after the date on which §60.8 requires a performance test to be completed, each owner or operator subject to this subpart shall not cause to be discharged into the atmosphere more than:

(1) 0.28 kilogram VOC per liter (kg VOC/ l) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s); or

(2) 0.14 kg VOC/ l of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or

(3) 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or

(4) A value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/ l of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency.

§ 60.463 Performance test and compliance provisions.

(a) Section 60.8(d) and (f) do not apply to the performance test.

(b) The owner or operator of an affected facility shall conduct an initial performance test as required under §60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in this section.

(c) The owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/ l of coating solids applied.

(1) An owner or operator shall use the following procedures for each affected facility that does not use a capture system and control device to comply with the emission limit specified under §60.462(a)(1). The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Administrator may require the owner or operator who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Administrator.

(i) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month for each affected facility, except as provided under paragraph (c)(1)(iv) of this section. The weighted average of the total mass of VOC's used per unit volume of coating solids applied each calendar month is determined by the following procedures.

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

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

($\sum L_{dj} D_{dj}$ will be 0 if no VOC solvent is added to the coatings, as received)

where

n is the number of different coatings used during the calendar month, and

m is the number of different VOC solvents added to coatings used during the calendar month.

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

$$L_s = \sum_{i=1}^n V_x L_{ci} \quad \text{Equation 2}$$

Where:

n is the number of different coatings used during the calendar month.

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

$$G = \frac{M_o + M_d}{L_s} \quad \text{Equation 3}$$

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

$$N = G \quad \text{Equation 4}$$

(iii) Where the volume-weighted average mass of VOC's discharged to the atmosphere per unit volume of coating solids applied (N) is equal to or less than 0.28 kg/ l, the affected facility is in compliance.

(iv) If each individual coating used by an affected facility has a VOC content, as received, that is equal to or less than 0.28 kg/ l of coating solids, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.

(2) An owner or operator shall use the following procedures for each affected facility that continuously uses a capture system and a control device that destroys VOC's (e.g., incinerator) to comply with the emission limit specified under §60.462(a) (2) or (3).

(i) Determine the overall reduction efficiency (R) for the capture system and control device.

For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed in paragraphs (c)(2)(i) (A), (B), and (C) of this section. In subsequent months, the owner or operator may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c)(2)(i) (A), (B), and (C) of this section, shall be repeated when directed by the Administrator or when the owner or operator elects to operate the control device or capture system at conditions different from the initial performance test.

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

$$F = \frac{\sum_{i=1}^l C_{in} Q_{in}}{\sum_{i=1}^l C_{in} Q_{in} + \sum_{j=1}^p C_{out} Q_{out}}$$

Equation 5

Where:

l is the number of gas streams entering the control device, and

p is the number of gas streams emitted directly to the atmosphere.

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

$$E = \frac{\sum_{i=1}^n Q_{in} C_{in} - \sum_{j=1}^m Q_{out} C_{out}}{\sum_{i=1}^n Q_{in} C_{in}}$$

Equation 6

Where:

n is the number of gas streams entering the control device, and

m is the number of gas streams leaving the control device and entering the atmosphere.

The owner or operator of the affected facility shall construct the VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in §60.466. The owner or operator of the affected facility shall construct a temporary enclosure around the coating applicator and flashoff area during the performance test for the purpose of evaluating the capture efficiency of the system. The enclosure must be maintained at a negative pressure to ensure that all VOC emissions are measurable. If a permanent enclosure exists in the affected facility prior to the performance test and the Administrator is satisfied that the enclosure is adequately containing VOC emissions, no additional enclosure is required for the performance test.

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

$$R = EF \quad \text{Equation 7}$$

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

(ii) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (A), (B), and (C) of this section.

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

$$N = G(1 - R) \quad \text{Equation 8}$$

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

(3) An owner or operator shall use the following procedure for each affected facility that uses a control device that recovers the VOC's (e.g., carbon adsorber) to comply with the applicable emission limit specified under §60.462(a) (2) or (3).

(i) Calculate the total mass of VOC's consumed ($M_o + M_d$) during each calendar month for each affected facility using equation (1).

(ii) Calculate the total mass of VOC's recovered (M_r) during each calendar month using the following equation:

$$M_r = L_r D_r \quad \text{Equation 9}$$

(iii) Calculate the overall reduction efficiency of the control device (R) for each calendar month for each affected facility using the following equation:

$$R = \frac{M_r}{M_o + M_d} \quad \text{Equation 10}$$

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

(iv) Calculate the total volume of coating solids consumed (L_s) and the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (B) and (C) of this section.

(v) Calculate the volume-weighted average mass of VOC's emitted to the atmosphere (N) for each calendar month for each affected facility using equation (8).

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

(4) An owner or operator shall use the following procedures for each affected facility that intermittently uses a capture system and a control device to comply with the emission limit specified in §60.462(a)(4).

(i) Calculate the total volume of coating solids applied without the control device in operation (L_{sn}) during each calendar month for each affected facility using the following equation:

$$L_{sn} = \sum_{i=1}^n V_{si} L_{ci} \quad \text{Equation 11}$$

Where:

n is the number of coatings used during the calendar month without the control device in operation.

(ii) Calculate the total volume of coating solids applied with the control device in operation (L_{sc}) during each calendar month for each affected facility using the following equation:

$$L_{sc} = \sum_{i=1}^n V_{si} L_{ci} \quad \text{Equation 12}$$

Where:

n is the number of coatings used during the calendar month with the control device in operation.

(iii) Calculate the mass of VOC's used without the control device in operation ($M_{on}+M_{dn}$) during each calendar month for each affected facility using the following equation:

$$M_{on} + M_{dn} + \sum_{i=1}^n L_{ci} D_{ci} W_{ci} + \sum_{j=1}^m L_{cj} D_{cj} \quad \text{Equation 13}$$

Where:

n is the number of different coatings used without the control device in operation during the calendar month, and

m is the number of different VOC-solvents added to coatings used without the control device in operation during the calendar month.

(iv) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied without the control device in operation (G_n) during each calendar month for each affected facility using the following equation:

$$G_n = \frac{M_{on} + M_{dn}}{L_{sn}} \quad \text{Equation 14}$$

(v) Calculate the mass of VOC's used with the control device in operation ($M_{oc}+M_{dc}$) during each calendar month for each affected facility using the following equation:

$$M_{oc} + M_{dc} = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{i=1}^m L_{di} D_{di} \quad \text{Equation 15}$$

Where:

n is the number of different coatings used with the control device in operation during the calendar month, and

m is the number of different VOC-solvents added to coatings used with the control device in operation during the calendar month.

(vi) Calculate the volume-weighted average of the total mass of VOC's used per unit volume of coating solids applied with the control device in operation (G_c) during each calendar month for each affected facility using the following equation:

$$G_c = \frac{M_{oc} + M_{dc}}{L_{sc}} \quad \text{Equation 16}$$

(vii) Determine the overall reduction efficiency (R) for the capture system and control device using the procedures in paragraphs (c)(2)(i) (A), (B), and (C) or paragraphs (c)(3) (i), (ii), and (iii) of this section, whichever is applicable.

(viii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month for each affected facility using the following equation:

$$N = \frac{G_n L_{sn} + G_c L_{sc} (1 - R)}{L_{sn} + L_{sc}} \quad \text{Equation 17}$$

Equation 17

(ix) Calculate the emission limit(s) for each calendar month for each affected facility using the following equation:

$$S = \frac{0.28 L_{sn} + 0.1 G_c L_{sc}}{L_{ns} + L_{sc}}$$

or

$$\frac{0.28 L_{5N} + 0.14 L_{5C}}{L_{5N} + L_{5C}} \quad \text{Equation 18}$$

whichever is greater.

(x) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to the calculated emission limit (S) for the calendar month, the affected facility is in compliance. Each monthly calculation is a performance test.

[47 FR 49612, Nov. 1, 1982; 48 FR 1056, Jan. 10, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.464 Monitoring of emissions and operations.

(a) Where compliance with the numerical limit specified in §60.462(a) (1) or (2) is achieved through the use of low VOC-content coatings without the use of emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, the owner or operator shall compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in §60.463.

(b) Where compliance with the limit specified in §60.462(a)(4) is achieved through the intermittent use of emission control devices, the owner or operator shall compute and record for each affected facility the average VOC content of coatings applied during each calendar month according to the equations provided in §60.463.

(c) If thermal incineration is used, each owner or operator subject to the provisions of this subpart shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with §60.462(a)(2), (3), or (4). This device shall have an accuracy of ± 2.5 °C. or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 °C (50 °F) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration. If catalytic incineration is used, the owner or operator shall install, calibrate, operate, and maintain a device to monitor and record continuously the gas temperature both upstream and downstream of the incinerator catalyst bed. This device shall have an accuracy of ± 2.5 °C. or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. During coating operations, the owner or operator shall record all periods in excess of 3 hours where the average difference between the temperature upstream and downstream of the incinerator catalyst bed remains below 80 percent of the temperature difference at which compliance was demonstrated during the most recent measurement of incinerator efficiency or when the inlet temperature falls more than 28 °C (50 °F) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration.

[47 FR 49612, Nov. 1, 1982; 48 FR 1056, Jan. 10, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.465 Reporting and recordkeeping requirements.

(a) Where compliance with the numerical limit specified in §60.462(a) (1), (2), or (4) is achieved through the use of low VOC-content coatings without emission control devices or through the use of higher VOC-

content coatings in conjunction with emission control devices, each owner or operator subject to the provisions of this subpart shall include in the initial compliance report required by §60.8 the weighted average of the VOC content of coatings used during a period of one calendar month for each affected facility. Where compliance with §60.462(a)(4) is achieved through the intermittent use of a control device, reports shall include separate values of the weighted average VOC content of coatings used with and without the control device in operation.

(b) Where compliance with §60.462(a)(2), (3), or (4) is achieved through the use of an emission control device that destroys VOC's, each owner or operator subject to the provisions of this subpart shall include the following data in the initial compliance report required by §60.8:

(1) The overall VOC destruction rate used to attain compliance with §60.462(a)(2), (3), or (4) and the calculated emission limit used to attain compliance with §60.462(a)(4); and

(2) The combustion temperature of the thermal incinerator or the gas temperature, both upstream and downstream of the incinerator catalyst bed, used to attain compliance with §60.462(a)(2), (3), or (4).

(c) Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under §60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

(d) The owner or operator of each affected facility shall also submit reports at the frequency specified in §60.7(c) when the incinerator temperature drops as defined under §60.464(c). If no such periods occur, the owner or operator shall state this in the report.

(e) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed.

[47 FR 49612, Nov. 1, 1982, as amended at 55 FR 51383, Dec. 13, 1990; 56 FR 20497, May 3, 1991; 65 FR 61761, Oct. 17, 2000]

§ 60.466 Test methods and procedures.

(a) The reference methods in appendix A to this part, except as provided under §60.8(b), shall be used to determine compliance with §60.462 as follows:

(1) Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24;

(2) Method 25, both for measuring the VOC concentration in each gas stream entering and leaving the control device on each stack equipped with an emission control device and for measuring the VOC concentration in each gas stream emitted directly to the atmosphere;

(3) Method 1 for sample and velocity traverses;

(4) Method 2 for velocity and volumetric flow rate;

(5) Method 3 for gas analysis; and

(6) Method 4 for stack gas moisture.

(b) For Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.

(c) For Method 25, the sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dscm (0.11 dscf); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

(d) The Administrator will approve testing of representative stacks on a case-by-case basis if the owner or operator can demonstrate to the satisfaction of the Administrator that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks.

[47 FR 49612, Nov. 1, 1982, as amended at 51 FR 22938, June 24, 1986; 65 FR 61761, Oct. 17, 2000]

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

**Attachment B
to a Part 70 Operating Permit Renewal**

Source Background and Description

Source Name:	National Processing Company
Source Location:	4506 W. Cline Ave., East Chicago, Indiana 46312
County:	Lake
SIC Code:	3316
Permit Renewal No.:	T089-29878-00384

**Title 40: Protection of Environment
PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR
SOURCE CATEGORIES**

**Subpart CCC—National Emission Standards for Hazardous Air Pollutants for Steel Pickling—HCl
Process Facilities and Hydrochloric Acid Regeneration Plants**

Source: 64 FR 33218, June 22, 1999, unless otherwise noted.

§ 63.1155 Applicability.

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

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

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

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

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

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

§ 63.1156 Definitions.

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

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

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

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

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

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

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

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

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

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

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

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

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

§ 63.1157 Emission standards for existing sources.

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

(1) Any gases that contain HCl in a concentration in excess of 18 parts per million by volume (ppmv); or

(2) HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.

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

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

§ 63.1158 Emission standards for new or reconstructed sources.

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

(i) Any gases that contain HCl in a concentration in excess of 6 ppmv; or

(ii) HCl at a mass emission rate that corresponds to a collection efficiency of less than 99 percent.

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

(i) Any gases that contain HCl in a concentration in excess of 18 ppmv; or

(ii) HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.

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

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

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

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

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

§ 63.1160 Compliance dates and maintenance requirements.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

§ 63.1161 Performance testing and test methods.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

$$\text{and } C_{\text{Cl}_2}(\text{ppmv}) = 0.339 C_{\text{Cl}_2}(\text{mg/dscm}),$$

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

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

§ 63.1162 Monitoring requirements.

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

(1) Conduct performance tests to measure the HCl mass flows at the control device inlet and outlet or the concentration of HCl exiting the control device according to the procedures described in §63.1161 of this subpart. Performance tests shall be conducted either annually or according to an alternative schedule that is approved by the applicable permitting authority, but no less frequently than every 21/2years or twice per title V permit term. If any performance test shows that the HCl emission limitation is being exceeded, then the owner or operator is in violation of the emission limit.

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

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

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

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

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

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

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

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

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

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

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

§ 63.1163 Notification requirements.

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

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

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

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

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

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

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

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

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

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

§ 63.1164 Reporting requirements.

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

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

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

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

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

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

[64 FR 33218, June 22, 1999, as amended at 71 FR 20458, Apr. 20, 2006]

§ 63.1165 Recordkeeping requirements.

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

(1) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

(2) The occurrence and duration of each malfunction of the air pollution control equipment;

(3) All maintenance performed on the air pollution control equipment;

(4) Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;

(5) All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see §63.10(b)(2)(v) of subpart A of this part);

(6) All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;

(7) All results of initial or subsequent performance tests;

(8) If the owner or operator has been granted a waiver from recordkeeping or reporting requirements under §63.10(f) of subpart A of this part, any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements;

(9) If the owner or operator has been granted a waiver from the initial performance test under §63.7(h) of subpart A of this part, a copy of the full request and the Administrator's approval or disapproval;

(10) All documentation supporting initial notifications and notifications of compliance status required by §63.9 of subpart A of this part; and

(11) Records of any applicability determination, including supporting analyses.

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

(i) Scrubber makeup water flow rate and recirculation water flow rate if a wet scrubber is used;

(ii) Calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and

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

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

(3) The owner or operator shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the

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

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

§ 63.1166 Implementation and enforcement.

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

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

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

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

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

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

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

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

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

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

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

[68 FR 37356, June 23, 2003]

§§ 63.1167-63.1174 [Reserved]

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

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

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

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

Source Description and Location

Source Name:	National Processing Company
Source Location:	4506 W. Cline Ave., East Chicago, Indiana 46312
County:	Lake
SIC Code:	3316
Part 70 Permit Renewal No.:	T089-29878-00384
Permit Reviewer:	Laura Spriggs

Public Notice Information

On May 16, 2011, the Office of Air Quality (OAQ) had a notice published in the *Post Tribune* in Merrillville, Indiana and in the *Times* in Munster, Indiana, stating that National Processing Company had applied for a renewal of their Part 70 Operating Permit, which was originally issued on August 18, 2006. The notice also stated that OAQ proposed to issue a renewal permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments Received

On May 27, 2011, OAQ received comments from Charmagne Ackerman of U.S. EPA - Region 5. The comments are summarized in the subsequent pages, with IDEM's corresponding responses.

The IDEM does not amend the Technical Support Document (TSD). The TSD is maintained to document the original review. This addendum to the TSD is used to document responses to comments and changes made from the time the permit was drafted until a final decision is made.

The summary of the comments and IDEM, OAQ responses, including changes to the permit (language deleted is shown in ~~strikeout~~ and language added is shown in **bold**) are as follows:

EPA Comment No. 1:

The previous version of the permit did not include PSD minor limits, however, the current permit in section D.1.2 includes PSD minor limits and Nonattainment NSR minor limits. The TSD does not provide any discussion or reason for the addition of these new limitations, nor does the permit refer to a construction permit in which these limits originated from.

IDEM Response No. 1:

As discussed below in IDEM Response No. 5, it is not clear how particulate emissions were estimated in the original Part 70 Operating Permit or in the construction permit. Calculations were performed as part of this Part 70 Operating Permit Renewal. The potential to emit of HCl was

determined based upon site-specific stack testing. It was conservatively assumed that all of the HCl emissions were present as PM, PM10, and PM2.5. Based on this conservative assumption, the unrestricted potential to emit of PM, PM10, and PM2.5 was determined to be 286.9 tons per year. Since this exceeds the PSD and Nonattainment major source thresholds, limits were included in the permit. Based upon the performance of the scrubber, the Permittee has stayed below the limits necessary to render PSD and Nonattainment NSR not applicable. Previously, the Permittee was effectively limited to less than the major source thresholds by virtue of the MACT requirements for existing affected sources. The MACT requires that the Permittee operate and control HCl emissions with a scrubber at 97% control efficiency (see Attachment B of the permit §63.1157(a)). Permit Condition D.1.2 is has been included in order to clarify the requirements as they apply to PSD and NA NSR.

No change has been made to the permit as a result of this comment.

EPA Comment No. 2:

The previous version of the permit did not include emissions limitations for VOC as listed in D.1.3. The TSD does not discuss or make mention the reasoning for the addition of these limitations. Please provide information.

IDEM Response No. 2:

There have not been changes to the operations and no new equipment has been added. It is IDEM's opinion that the roll oil coating operation is subject to 326 IAC 8-2-4 because a coating is being applied to metal coils from a facility that was existing as of July 1, 1990, the source is located in Lake County, and the actual emissions exceed fifteen (15) pounds of VOC per day. The rule requirement may have been inadvertently not included in the Original Part 70 Operating Permit, but this is being corrected through this Part 70 Operating Permit Renewal. These requirements and the applicability of the rule are discussed on page 14 of 17 of the TSD.

No change has been made to the permit as a result of this comment.

EPA Comment No. 3:

Several of the subsections of D.1 refer to 40 CFR 64 for its authority, has the facility submitted a CAM plan or have requirements been incorporated into the permit only citing to CAM? Please clarify.

IDEM Response No. 3:

The State of Indiana's Title V compliance monitoring requirements as required under 326 IAC 2-7-5 and 326 IAC 2-7-6 are generally sufficient to satisfy CAM and therefore, we have not required separate CAM plans to be submitted for units that are not large units under the rule. IDEM worked cooperatively with the source to develop a plan that meets the requirements of 40 CFR 64 and the draft permit reflects those discussions.

No change has been made to the permit as a result of this comment.

EPA Comment No. 4:

Section E.1 appears to be a new addition to the permit. Was the facility not previously subject to NSPS TT? Have the facility operations changes such that it is now subject to this regulation? Please provide clarification.

IDEM Response No. 4:

There have not been changes to the operations and no new equipment has been added. It is IDEM's opinion that the roll oil coating operation is subject to 40 CFR 60, Subpart TT because it is a metal coil surface coating operation that was constructed after January 5, 1981. The rule requirements may have been inadvertently not included in the Original Part 70 Operating Permit, but this is being corrected through this Part 70 Operating Permit Renewal.

No change has been made to the permit as a result of this comment.

EPA Comment No. 5:

Please provide discussion on the change in potential to emit for PM/PM10/PM2.5. The previous permit listed the PTE as less than 25 tpy for these pollutants. The PTE listed in the renewal is 287 tpy. There was no discussion provided in the TSD to explain the change in emission estimation.

IDEM Response No. 5:

Calculations were not provided with the original Part 70 Operating Permit, so it is not clear how the PTE values listed in the technical support document for the original Part 70 Operating Permit were determined. As part of this Part 70 Operating Permit Renewal, calculations for the source were performed and are included as Appendix A to the technical support document. Calculations for HCl were determined based on site-specific stack testing. The Permittee made a conservative assumption that all of the HCl emitted was in the form of PM, PM10, and PM2.5. No changes were made to the operations and no new equipment was added. However, since the calculated unrestricted potential to emit of PM, PM10, and PM2.5 exceeds the PSD and Nonattainment NSR major source thresholds, minor limits were included to clarify the requirements for minor NSR as related to PM, PM10, and PM2.5 in the Part 70 Operating Permit Renewal as discussed in IDEM Response No. 1. Note that the limits established in 40 CFR 63, Subpart CCC, effectively limited PM, PM10, and PM2.5 as well as HCl.

No change has been made to the permit as a result of this comment.

Other Changes

Pursuant to the Greenhouse Gas (GHG) Tailoring Rule, issued on May 13, 2010, starting in July of 2011, sources emitting GHGs in excess of 100,000 tons per year of carbon dioxide equivalent (CO₂e) are considered major sources for Title V and Prevention of Significant Deterioration (PSD). National Processing Company is already a major source for Title V; however, it has taken limits to be a minor source under PSD. GHG calculations were not originally performed as part of the permit that was proposed for public notice. The calculations have now been performed and are included in the Addendum to Appendix A of the Technical Support Document.

Based upon the GHG calculations, this existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and it is not in one of the twenty-eight (28) listed source categories.

No changes are being made to the permit as a result of this item. The Addendum to TSD Appendix A now includes GHG calculations for natural gas combustion and for welding operations. In addition, the total GHGs are included on the summary page.

**Addendum to Appendix A: Emissions Calculations
Summary**

Company Name: National Processing Company
 Location: 4506 W. Cline Ave., East Chicago, IN 46312
 Part 70 Operating Permit Renewal No.: T089-29878-00384
 Reviewer: Laura Spriggs

Uncontrolled Potential to Emit (ton/yr)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HCl	Total HAPs	GHGs (CO2e)
Steel Pickling Line	286.89	286.89	286.89	--	--	20.32	--	286.89	286.89	--
(2) HCl Storage Vessels	--	--	--	--	--	--	--	0.54	0.54	--
(3) Spent Acid Storage Vessels	--	--	--	--	--	--	--	0.58	0.58	--
Insignificant Activities										
Combined Natural Gas Combustion	0.16	0.65	0.65	0.05	8.52	0.47	7.16	--	0.16	10249.6
Welding Facility	0.10	0.10	0.10	--	--	--	--	--	0.008	2.11
(5) Oil Coating Storage Vessels	--	--	--	--	--	0.001	--	--	*	--
(2) Soap Coating Storage Vessels	--	--	--	--	--	--	--	--	--	--
(1) Diesel Fuel Storage Vessel	--	--	--	--	--	0.0002	--	--	*	--
Total	287.15	287.64	287.64	0.05	8.52	20.79	7.16	288.01	288.18	10251.7

Controlled Potential to Emit (ton/yr)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HCl	Total HAPs	GHGs (CO2e)
Steel Pickling Line	0.86	0.86	0.86	--	--	20.32	--	0.86	0.86	--
(2) HCl Storage Vessels	--	--	--	--	--	--	--	0.0016	0.0016	--
(3) Spent Acid Storage Vessels	--	--	--	--	--	--	--	0.0017	0.0017	--
Insignificant Activities										
Combined Natural Gas Combustion	0.16	0.65	0.65	0.05	8.52	0.47	7.16	--	0.16	10249.6
Welding Facility	0.10	0.10	0.10	--	--	--	--	--	0.01	2.11
(5) Oil Coating Storage Vessels	--	--	--	--	--	0.001	--	--	*	--
(2) Soap Coating Storage Vessels	--	--	--	--	--	--	--	--	--	--
(1) Diesel Fuel Storage Vessel	--	--	--	--	--	0.0002	--	--	*	--
Total	1.12	1.61	1.61	0.05	8.52	20.79	7.16	0.86	1.03	10251.7

Limited Potential to Emit (ton/yr)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HCl	Total HAPs	GHGs (CO2e)
Steel Pickling Line	99.0	99.0	99.0	--	--	20.32	--	286.89	286.89	--
(2) HCl Storage Vessels	--	--	--	--	--	--	--	0.54	0.54	--
(3) Spent Acid Storage Vessels	--	--	--	--	--	--	--	0.58	0.58	--
Insignificant Activities										
Combined Natural Gas Combustion	0.16	0.65	0.65	0.05	8.52	0.47	7.16	--	0.16	10249.6
Welding Facility	0.10	0.10	0.10	--	--	--	--	--	0.01	2.11
(5) Oil Coating Storage Vessels	--	--	--	--	--	0.001	--	--	*	--
(2) Soap Coating Storage Vessels	--	--	--	--	--	--	--	--	--	--
(1) Diesel Fuel Storage Vessel	--	--	--	--	--	0.0002	--	--	*	--
Total	99.25	99.74	99.74	0.05	8.52	20.79	7.16	288.01	288.18	10251.7

* Not estimated

**Addendum to Appendix A: Emissions Calculations
Coil Steel Pickling Line**

Company Name: National Processing Company
 Location: 4506 W. Cline Ave., East Chicago, IN 46312
 Part 70 Operating Permit Renewal No.: T089-29878-00384
 Reviewer: Laura Spriggs

PTE of HCl and Particulate*

Emission Unit	Maximum Throughput (ton coils/hr)	Uncontrolled HCl EF (lb/ton)	Scrubber Control Efficiency for HCl	Uncontrolled PTE HCl and Particulate* (lb/hr)	Uncontrolled PTE HCl and Particulate* (ton/yr)	Controlled PTE HCl and Particulate* (ton/yr)	Controlled PTE HCl and Particulate* (lb/hr)
Coil Steel Pickling Line	125	0.524	99.7%	65.50	286.89	0.86	0.1965

Methodology

Uncontrolled HCl Emission Factor (EF) and Scrubber Control Efficiency is based on 1/6/2010 testing.
 Uncontrolled PTE HCl (lb/hr) = Maximum Throughput (ton coil/hr) x Uncontrolled HCl EF (lb/ton)
 Uncontrolled PTE HCl (ton/yr) = Uncontrolled PTE HCl (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)
 Controlled PTE HCl (ton/yr) = Uncontrolled PTE HCl (ton/yr) x (1 - Control Efficiency)

*As a worst case assumption, particulate emissions are assumed to equal HCl emissions since HCl is emitted as particulate. It is assumed that PM=PM10=PM2.5

326 IAC 6.8-1-2 Particulate Matter Emission Limitation

Emission Unit	Scrubber Air Flow (acfm)	326 IAC 6.8-1-2 PM Emission Limit (gr/acf)	326 IAC 6.8-1-2 PM Allowable Emissions (lb/hr)	Capable of Complying with Emission Limit?
Coil Steel Pickling Line	7950	0.03	2.04	Yes - with scrubber

Methodology

326 IAC 6.8-1-2 PM Allowable Emissions (lb/hr) = Scrubber Air Flow (acfm) x Outlet Grain Loading (gr/acf) x (60 min/hr) x (1 lb/7000 gr)

VOC Emissions from Roll Oil Coating

Material	Density (lb/gal)	Coating Usage (gal/hr)	Weight % Organic Volatiles	lb VOC/gal Coating (lb VOC/gal)	PTE VOC (ton/yr)	Transfer Efficiency	PTE Particulate (ton/yr)
Roll Oil Coating	7.42	2.50	25.00%	1.86	20.32	100%	0.00

Methodology

lb VOC/gal Coating (lb VOC/gal) = Density (lb/gal) x Weight % Organic Volatiles
 PTE VOC (ton/yr) = Coating Usage (gal/hr) x lb VOC/gal Coating x (8760 hr/yr) x (1 ton/2000 lb)

PTE Particulate (ton/yr) = Coating Usage (gal/hr) x lb VOC/gal Coating x (1 - Transfer Efficiency) x (8760 hr/yr) x (1 ton/2000 lb)

**Addendum to Appendix A: Emissions Calculations
Storage Tanks**

Company Name: National Processing Company
 Location: 4506 W. Cline Ave., East Chicago, IN 46312
 Part 70 Operating Permit Renewal No.: T089-29878-00384
 Reviewer: Laura Spriggs

Tank	Capacity Each	Total Capacity	Working Loss (lb/yr)	Breathing Loss (lb/yr)	Total Emissions (lb/yr)	Total Emissions (ton/yr)	Control	Controlled Emissions (ton/yr)
HCl Storage Vessel 1	24100		361.18	179.21	540.39	0.27	99.7%	0.0008
HCl Storage Vessel 2	24100		361.18	179.21	540.39	0.27	99.7%	0.0008
Spent Acid Storage Vessel 1	11000	33000	318.14	70.29	388.43	0.19	99.7%	0.0006
Spent Acid Storage Vessel 2	11000		318.14	70.29	388.43	0.19	99.7%	0.0006
Spent Acid Storage Vessel 3	11000		318.14	70.29	388.43	0.19	99.7%	0.0006
(5) Oil Coating Storage Vessels	500	2500	1.5	0.75	2.25	0.001	0.0%	0.0011
(2) Soap Coating Storage Vessels	2500	5000	0	0	0	0	0.0%	0
(1) Diesel Fuel Storage Vessel	500		0.2	0.2	0.4	0.0002	0.0%	0.0002
Total			1678.48	570.24	2248.72	1.12		0.005

Methodology

Emissions based on TANKS reports provided by the Permittee (see Appendix B to this TSD)

Total Emissions (lb/yr) = Working Loss (lb/yr) + Breathing Loss (lb/yr)

Total Emission (ton/yr) = Total Emissions (lb/yr) x (1 ton/2000 lb)

Control based on scrubber control efficiency for the pickling operation

Controlled Emissions (ton/yr) = Total Emissions x (1 - Control Efficiency)

**Addendum to Appendix A: Emissions Calculations
Natural Gas Combustion Emissions Units (Less than 100 MMBtu/hr)**

Company Name: National Processing Company
Location: 4506 W. Cline Ave., East Chicago, IN 46312
Part 70 Operating Permit Renewal No.: T089-29878-00384
Reviewer: Laura Spriggs

Emission Factor in lb/MMCF	Criteria Pollutants							GHGs						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO	CO2	N2O	CH4	GHG Mass-Based	CO2e		
	1.9	7.6	7.6	0.6	100.0	5.5	84.0	120000	0.64	2.3				
					**see below									
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)											
(1) Natural Gas Fired Boiler (ID 1)	0.64	5.496	0.005	0.021	0.021	0.002	0.275	0.015	0.231	329.788	0.002	0.006	329.80	330.47
(1) Natural Gas Fired Boiler (ID 2)	0.64	5.496	0.005	0.021	0.021	0.002	0.275	0.015	0.231	329.788	0.002	0.006	329.80	330.47
(1) Natural Gas Fired Comfort Heating Furnace (ID 3)	1.925	16.532	0.016	0.063	0.063	0.005	0.827	0.045	0.694	991.941	0.005	0.019	991.97	993.98
(1) Natural Gas Fired Comfort Heating Furnace (ID 4)	1.925	16.532	0.016	0.063	0.063	0.005	0.827	0.045	0.694	991.941	0.005	0.019	991.97	993.98
(1) Natural Gas Fired Hot Water Heater (ID 5)	0.076	0.653	0.001	0.002	0.002	0.000	0.033	0.002	0.027	39.162	0.000	0.001	39.16	39.24
(130) Natural Gas Fired Radiant Space Heaters (ID 6) - each 0.1 MMBtu/hr	13	111.647	0.106	0.424	0.424	0.033	5.582	0.307	4.689	6698.824	0.036	0.128	6698.99	6712.60
(27) Natural Gas Fired Radiant Space Heaters (ID 7) - each 0.05 MMBtu/hr	1.35	11.594	0.011	0.044	0.044	0.003	0.580	0.032	0.487	695.647	0.004	0.013	695.66	697.08
(1) Natural Gas Fired Comfort Heating Furnace (ID 8)	0.1	0.859	0.001	0.003	0.003	0.0003	0.043	0.002	0.036	51.529	0.000	0.001	51.53	51.64
(1) Natural Gas Fired Comfort Heating Furnace (ID 9)	0.12	1.031	0.001	0.004	0.004	0.0003	0.052	0.003	0.043	61.835	0.000	0.001	61.84	61.96
(1) Natural Gas Fired Hot Water Heater (ID 10)	0.04	0.344	0.0003	0.001	0.001	0.0001	0.017	0.001	0.014	20.612	0.000	0.000	20.61	20.65
(1) Natural Gas Fired Hot Water Heater (ID 11)	0.034	0.292	0.0003	0.001	0.001	0.0001	0.015	0.001	0.012	17.520	0.000	0.000	17.52	17.56
Total:			0.16	0.65	0.65	0.05	8.52	0.47	7.16	10228.59	0.05	0.20	10228.84	10249.62

Emission Factors are from AP-42, Tables 1.4-1 and 1.4-2.

*PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable PM combined.

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

Emission Factor in lb/MMCF	HAPs - Organics					HAPs - Metals					Total HAPs		
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel			
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	1.8880		
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)										
(1) Natural Gas Fired Boiler (ID 1)	0.64	5.496	5.8E-06	3.3E-06	2.1E-04	4.9E-03	9.3E-06	1.4E-06	3.0E-06	3.8E-06	1.0E-06	5.8E-06	5.2E-03
(1) Natural Gas Fired Boiler (ID 2)	0.64	5.496	5.8E-06	3.3E-06	2.1E-04	4.9E-03	9.3E-06	1.4E-06	3.0E-06	3.8E-06	1.0E-06	5.8E-06	5.2E-03
(1) Natural Gas Fired Comfort Heating Furnace (ID 3)	1.925	16.532	1.7E-05	9.9E-06	6.2E-04	1.5E-02	2.8E-05	4.1E-06	9.1E-06	1.2E-05	3.1E-06	1.7E-05	1.6E-02
(1) Natural Gas Fired Comfort Heating Furnace (ID 4)	1.925	16.532	1.7E-05	9.9E-06	6.2E-04	1.5E-02	2.8E-05	4.1E-06	9.1E-06	1.2E-05	3.1E-06	1.7E-05	1.6E-02
(1) Natural Gas Fired Hot Water Heater (ID 5)	0.076	0.653	6.9E-07	3.9E-07	2.4E-05	5.9E-04	1.1E-06	1.6E-07	3.6E-07	4.6E-07	1.2E-07	6.9E-07	6.2E-04
(130) Natural Gas Fired Radiant Space Heaters (ID 6) - each 0.1 MMBtu/hr	13	111.647	1.2E-04	6.7E-05	4.2E-03	1.0E-01	1.9E-04	2.8E-05	6.1E-05	7.8E-05	2.1E-05	1.2E-04	1.1E-01
(27) Natural Gas Fired Radiant Space Heaters (ID 7) - each 0.05 MMBtu/hr	1.35	11.594	1.2E-05	7.0E-06	4.3E-04	1.0E-02	2.0E-05	2.9E-06	6.4E-06	8.1E-06	2.2E-06	1.2E-05	1.1E-02
(1) Natural Gas Fired Comfort Heating Furnace (ID 8)	0.1	0.859	9.0E-07	5.2E-07	3.2E-05	7.7E-04	1.5E-06	2.1E-07	4.7E-07	6.0E-07	1.6E-07	9.0E-07	8.1E-04
(1) Natural Gas Fired Comfort Heating Furnace (ID 9)	0.12	1.031	1.1E-06	6.2E-07	3.9E-05	9.3E-04	1.8E-06	2.6E-07	5.7E-07	7.2E-07	2.0E-07	1.1E-06	9.7E-04
(1) Natural Gas Fired Hot Water Heater (ID 10)	0.04	0.344	3.6E-07	2.1E-07	1.3E-05	3.1E-04	5.8E-07	8.6E-08	1.9E-07	2.4E-07	6.5E-08	3.6E-07	3.2E-04
(1) Natural Gas Fired Hot Water Heater (ID 11)	0.034	0.292	3.1E-07	1.8E-07	1.1E-05	2.6E-04	5.0E-07	7.3E-08	1.6E-07	2.0E-07	5.5E-08	3.1E-07	2.8E-04
Total:			1.8E-04	1.0E-04	6.4E-03	1.5E-01	2.9E-04	4.3E-05	9.4E-05	1.2E-04	3.2E-05	1.8E-04	1.6E-01

Emission Factors are from AP-42, Tables 1.4-3 and 1.4-4.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology

Heating Value of Natural Gas is assumed to be 1020 MMBtu/MMCF

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,020 MMBtu

Potential Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * (1 ton/2,000 lb)

GHGs:

GHG Mass-Based (ton/yr) = CO2 (ton/yr) + N2O (ton/yr) + CH4 (ton/yr)

$$CO2e = \sum_{i=1}^n GHG_i \cdot GWP_i$$

Where:

CO2e = carbon dioxide equivalent (ton/yr)

GHGi = mass emission rate of each greenhouse gas (ton/yr)

GWPi = global warming potential for each greenhouse gas

n = number of greenhouse gases emitted

GWPs from 40 CFR 98, Subpart A, Table A-1: 1 for CO2, 21 for CH4, 310 for N2O

Addendum to Appendix A: Emissions Calculations
Welding

Company Name: National Processing Company
Location: 4506 W. Cline Ave., East Chicago, IN 46312
Part 70 Operating Permit Renewal No.: T089-29878-00384
Reviewer: Laura Spriggs

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)		EMISSIONS (lbs/hr)		HAPS (lbs/hr)
			PM/PM10/PM2.5	Mn	PM/PM10/PM2.5	Mn	
WELDING							
Metal Inert Gas (MIG)(carbon steel)	2	0.03	0.0055	0.0005	0.0003	0.00003	0.00003
Stick (E7018 electrode)	6	0.05	0.0211	0.0009	0.006	0.0003	0.0003
Oxyacetylene(carbon steel)	6	0.5	0.0055	0.0005	0.017	0.002	0.002
Total (lb/hr)					0.023	0.002	0.002
Total (ton/yr)					0.10	0.008	0.008

Methodology

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
Welding emissions, lb/hr = (# of stations) x (max. lbs of electrode used/hr/station) x (emission factor, lb. pollutant/lb. of electrode used)
Total Emissions (ton/yr) = Total Emissions (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)

CO₂ Emissions from Welding Gases

Source	Volume Consumed	UOM	Conversion Factor (kg of CO ₂ /m ³)	CO ₂ (kg)	CO ₂ tons
Acetylene	30.58	m ³	61.98	1895.3484	2.089
C-25 Shielding Gas	42.59	m ³	0.42341	18.0330319	0.020
Total				1913.381432	2.109

Acetylene

C₂H₂, 26.04 g/mol, SG 0.906 (at 1 ATM)

Acetylene is purchased in cubic feet in 250 psi pressurized cylinders

2010 purchases = 1080 cubic feet

1 cubic foot = 0.02831684 m³

1080 cubic feet = 30.58 m³

Using ideal gas law, 1 m³@ 250 psi, 70 degrees F has about 704 moles of gas

1 m³ acetylene = 704 moles X 26.05 g/mol = 18.339 kg

Since 3.38 kg of CO₂ are produced from burning one kg of acetylene, the conversion factor for acetylene from m³ to kg CO₂ is:

18.339 X 3.38 = 61.98 CO₂/m³ acetylene

C-25 Shielding Gas

4.45 kg CO₂ and 13.37 kg Argon per 10.51 m³ cylinder

2010 purchases = 1504 cubic feet

1504 cubic feet = 42.59 m³

To calculate CO₂ per m³ of C-25:

4.45 kg CO₂ is divided by 10.51 m³ cylinder

So the conversion factor for CO₂ per m³ of C-25 is 0.42341 kg/m³

Addendum to Appendix A: Emissions Calculations
Fugitive Emissions

Company Name: National Processing Company
 Location: 4506 W. Cline Ave., East Chicago, IN 46312
 Part 70 Operating Permit Renewal No.: T089-29878-00384
 Reviewer: Laura Spriggs

Traffic Patterns - All Paved Roads

Twenty 20-ton Semi-Trucks/Day (average load)

Forty 2-ton cars/day (average load)

Average Weight of Vehicle = [(20 x 20 tons) + (40 x 2 tons)]/60 vehicles = 8 tons/vehicle

Daily Travel Length = 0.25 vehicle miles per vehicle

Total Annual Travel Miles = 0.25 miles/vehicle-day x 365 days/yr x 60 vehicles

Paved Roads

The following calculations determine the amount of emissions created by paved roads, based on AP-42, Ch 13.2.1 (1/2011)

Parameter	PM	PM10	PM2.5	Source/Method
Ef = particulate emission factor (lb/VMT)	0.73	0.15	0.04	= $k \cdot (sL^{0.91}) \cdot (W^{1.02})$, Ch. 13.2.1, eqn (1)
k = particle size multiplier (lb/VMT)	0.011	0.0022	0.00054	Table 13.2.1-1
sL = road surface silt loading (g/m ²)	9.7	9.7	9.7	Table 13.2.1-4 (for iron and steel production)
W = average weight of vehicles traveling the road (tons)	8.0	8.0	8.0	Provided by the source
VMT/yr = vehicle miles traveled per year	5475	5475	5475	Provided by the source
PTE = Potential to Emit (ton/yr)	1.99	0.40	0.10	= Ef (lb/VMT) x VMT/yr x (1 ton/2000 lb)

Taking natural mitigation due to precipitation into consideration:

Parameter	PM	PM10	PM2.5	Source/Method
Eext = particulate emission factor extrapolated for natural mitigation (lb/VMT)	0.66	0.13	0.03	= $E_f \cdot [1 - (P/4N)]$, Ch. 13.2.1, eqn (2)
P = number of days in a year with at least 0.01 in of precipitation	125	125	125	Based on Figure 13.2.1-2
N = number of days in a year	365	365	365	
PTE = Potential to Emit (ton/yr)	1.82	0.36	0.09	= Eext (lb/VMT) x VMT/yr x (1 ton/2000 lb)

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	National Processing Company
Source Location:	4506 W. Cline Ave., East Chicago, Indiana 46312
County:	Lake
SIC Code:	3316
Part 70 Permit Renewal No.:	T089-29878-00384
Permit Reviewer:	Laura Spriggs

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from National Steel Processing Company relating to the operation of a stationary coil steel pickling line and steel cutting operation. On November 16, 2010, National Processing Company submitted an application to the OAQ requesting to renew its operating permit. National Processing Company was issued a Part 70 Operating Permit (T089-11186-00384) on August 18, 2006.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) coil steel pickling line, installed in 1982, with a maximum pickling throughput of 250,000 pounds of steel coils per hour, with hydrochloric acid emissions controlled by a wet scrubber, with a maximum flow rate of 7950 actual cubic feet per minute (acfm), exhausting to stack S1, consisting of:
 - (1) one (1) wash tank, with a surface area of 7.5 ft by 8.3 ft
 - (2) three (3) pickling tanks (1-3), each with a corresponding recirculation tank and a surface area of 50 ft by 8.3 ft
 - (3) one (1) four-stage rinse tank system
 - (4) one (1) roll oil coating operation
 - (5) one (1) roll soap coating operation

Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.

- (b) Two (2) storage vessels, installed in 1982, containing hydrochloric acid, with a capacity of 24,100 gallons each. Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.
- (c) Three (3) storage vessels, installed in 1982, containing spent acid, with a total combined capacity of 33,000 gallons. Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.

Insignificant Activities

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

- (a) Two (2) natural gas-fired boilers, identified as 1 and 2, with a heat input capacity of 0.64 MMBtu/hr each, built in 1982. [326 IAC 6.8-1-2]
- (b) Two (2) natural gas-fired comfort heating furnaces, identified as 3 and 4, with a heat input capacity of 1.925 MMBtu/hr each. [326 IAC 6.8-1-2]
- (c) One (1) natural gas-fired hot water heater, identified as 5, with a heat input capacity of 0.076 MMBtu/hr. [326 IAC 6.8-1-2]
- (d) One hundred thirty (130) natural gas-fired radiant space heaters, identified collectively as 6, with a heat input capacity of 0.1 MMBtu/hr each. [326 IAC 6.8-1-2]
- (e) Twenty seven (27) natural gas-fired radiant space heaters, identified collectively as 7, with a heat input capacity of 0.05 MMBtu/hr each. [326 IAC 6.8-1-2]
- (f) One (1) natural gas-fired comfort heating furnace, identified as 8, with a heat input capacity of 0.1 MMBtu/hr. [326 IAC 6.8-1-2]
- (g) One (1) natural gas-fired comfort heating furnace, identified as 9, with a heat input capacity of 0.12 MMBtu/hr. [326 IAC 6.8-1-2]
- (h) One (1) natural gas-fired hot water heater, identified as 10, with a heat input capacity of 0.04 MMBtu/hr. [326 IAC 6.8-1-2]
- (i) One (1) natural gas-fired hot water heater, identified as 11, with a heat input capacity of 0.034 MMBtu/hr. [326 IAC 6.8-1-2]
- (j) Welding facility, consisting of two (2) welding stations, using metal inert gas (MIG), with a maximum consumption of wire per station of 0.03 pounds per hour, six (6) welding stations using electrodes with a maximum consumption of electrodes per station of 0.05 pounds per hour and six (6) welding stations using oxyacetylene with a maximum metal consumption per station of 0.5 pounds per hour. [326 IAC 6.8-1-2]
- (k) Five (5) storage vessels, containing oil coating, with a capacity of 500 gallons each, installed in 1990.
- (l) Two (2) storage vessels, containing soap coating, with a capacity of 550 gallons and 600 gallons, respectively.
- (m) Two (2) storage vessels, containing caustic soda, with a capacity of 2500 gallons each.
- (n) One (1) storage vessel, containing diesel fuel, with a capacity of 500 gallons.
- (o) Paved Roads.

Units Removed from the Source

The following insignificant activity has been removed from the source:

- One (1) 16" table saw with emissions controlled by a bag system.

Existing Approvals

The source has not received any approvals since the issuance of Part 70 Operating Permit No. T089-11186-00384 on August 18, 2006.

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

Air Pollution Control Justification as an Integral Part of the Process

The following determination was made in the technical support document to Part 70 Operating Permit No. T089-11186-00384:

National Processing Company submitted the following justification such that the wet scrubber be considered as an integral part of the pickling line:

The process contains a wet scrubber which collects steam and fumes from the baths which contain hydrochloric acid. The scrubber processes the steam and fumes and returns it to the baths. The wet scrubber is an integral part of the process because it maintains the baths at an operable temperature. It is estimated that the pickling line could continue to operate for up to 30 minutes after the wet scrubber has malfunctioned.

IDEM, OAQ has evaluated the justifications and determined that the wet scrubber will not be considered as an integral part of the pickling line. Although the wet scrubber does have an effect on the temperature of the pickling line baths, the temperature can be adjusted with the use of heat exchangers. In the event of the wet scrubber being inoperable, automatic temperature controllers (ATC) can limit the flow of steam to the heat exchangers thus decreasing the temperature of the acid solution entering the pickling line which allows the pickling line to remain at an operable temperature. Therefore, the permitting level will be determined using the potential to emit before the scrubber.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

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.
¹ The 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. Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x 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 NO_x 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**
 Marion County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, PM₁₀, NO₂, and lead. 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	287.15
PM ₁₀	287.64
PM _{2.5}	287.64
SO ₂	0.05
VOC	20.79
CO	7.16
NO _x	8.52
Single HAP	HCl – 288.01
Total HAP	Greater than 288.18

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions as reported by the source. This information reflects the 2008 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.14
PM ₁₀	0.14
SO ₂	0.01
VOC	0.10
CO	1.55
NO _x	1.85
HCl	1.47

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

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

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Steel Pickling Line	99.0	99.0	99.0	--	--	20.32	--	286.9	286.9 (HCl)
Two (2) HCl Storage Vessels	--	--	--	--	--	--	--	0.54	0.54 (HCl)
Three (3) Spent Acid Storage Vessels	--	--	--	--	--	--	--	0.58	0.58 (HCl)
Insignificant Activities									
Natural Gas Combustion (Total)	0.16	0.65	0.65	0.05	8.52	0.47	7.16	0.16	0.15 (hexane)
Welding	0.10	0.10	0.10	--	--	--	--	0.01	0.01 (Mn)
Four (4) Oil Coating Storage Vessels	--	--	--	--	--	0.001	--	*	*
One (1) Diesel Fuel Storage Vessel	--	--	--	--	--	0.0002	--	*	*
Total PTE of Entire Source	99.25	99.74	99.74	0.05	8.52	20.79	7.16	> 25	> 10
PSD Major Source Thresholds	250	250	N/A	250	250	250	250	N/A	N/A
Nonattainment NSR Major Source Thresholds	N/A	N/A	100	100	N/A	N/A	N/A	N/A	N/A
*Not estimated									

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

- (b) This existing stationary source is not major for Emission Offset and Nonattainment NSR because the emissions of the nonattainment pollutant, PM_{2.5}, and the emissions of SO₂ as a precursor to PM_{2.5}, are less than one hundred (<100) tons per year.

Since the unrestricted potential to emit of PM and PM₁₀ are each greater than the PSD major source threshold of 250 tons per year and the unrestricted potential to emit of PM_{2.5} is greater than the nonattainment new source review major source threshold of 100 tons per year, the source shall limit its emissions to be a minor source under PSD and Nonattainment NSR as follows:

- (a) The PM emissions from the Pickling Line Operation shall not exceed 22.6 lb/hr.
- (b) The PM₁₀ emissions from the Pickling Line Operation shall not exceed 22.6 lb/hr.
- (c) The PM_{2.5} emissions from the Pickling Line Operation shall not exceed 22.6 lb/hr.

Compliance with the above limits, combined with the potential to emit PM, PM₁₀, and PM_{2.5} from other units at the source, shall limit PM and PM₁₀ emissions from the entire source to less than two hundred-fifty (250) tons per twelve (12) consecutive month period each and shall limit PM_{2.5} emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) are not applicable to this source.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

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

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

Emission Unit / Pollutant	Control Device Used	Emission Limitation or Standard (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Pickling Line – PM	Y- Scrubber	Y	286.9	0.86	100	Y	N
Pickling Line – PM ₁₀	Y – Scrubber	Y	286.9	0.86	100	Y	N

Emission Unit / Pollutant	Control Device Used	Emission Limitation or Standard (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Pickling Line – PM2.5	Y – Scrubber	Y	286.9	0.86	100	Y	N
Pickling Line – HCl	Y - Scrubber	Y	286.9	0.86	10	N*	N

*The pickling line is subject to 40 CFR 63, Subpart CCC, which was promulgated after November 15, 1990 and which contains an emission limitation for HCl. Pursuant to 40 CFR 64.2(b)(1)(i), the pickling line is exempt from CAM requirements for HCl.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the pickling line for PM, PM10, and PM2.5 upon issuance of the Title V Renewal. A CAM plan will be incorporated into this Part 70 permit renewal.

New Source Performance Standards (NSPS)

- (a) *40 CFR 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*
 The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40c, Subpart Dc are not included in the permit because there are no steam generating units with a maximum heat input capacity of greater than or equal to 10 MMBtu/hr.
- (b) *40 CFR 60, Subpart Ka: Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*
 The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 are not included in this permit for the diesel fuel storage tank because diesel fuel does not meet the definition of a petroleum liquid and the storage tank has a capacity of less than 40,000 gallons.
- (c) *40 CFR 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*
 The requirements of the New Source Performance Standards for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60.110b, Subpart Kb are not included for the storage vessels at this source. The HCl storage vessels and spent acid storage vessels are not volatile organic liquid storage vessels and the other storage vessels each have a capacity of less than 75 cubic meters in capacity. In addition, these units were installed prior to July 23, 1984.
- (d) *40 CFR 60, Subpart TT: Standards of Performance for Metal Coil Surface Coating*
 The requirements of the New Source Performance Standards for Metal Coil Surface Coating, 40 CFR 60.460, Subpart TT, which are incorporated as 326 IAC 12 are included in this permit for the roll oil coating operation because it is a metal coil surface coating operation that was constructed after January 5, 1981.

The entire rule has been included as Attachment A to the permit. The roll coating operation is subject to the following portions of 40 CFR 60, Subpart TT:

- (1) 40 CFR 60.460;

- (2) 40 CFR 60.461;
- (3) 40 CFR 60.462(a)(1);
- (4) 40 CFR 60.463(a), (b), (c)(1);
- (5) 40 CFR 60.464(a);
- (6) 40 CFR 60.465(a), (c), (e); and
- (7) 40 CFR 60.466(a)(1), (b), (d).

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

- (a) *40 CFR 63, Subpart CCC: NESHAP for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants*

The Permittee is subject to the provisions of 40 CFR 63.1155, Subpart CCC, National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants, which is incorporated by reference as 326 IAC 20-29, because this source contains steel pickling facilities that pickle carbon steel using hydrochloric acid solution that contains 6% or more by weight HCl and is at a temperature of 100 °F or higher. The requirements of 40 CFR 63, Subpart CCC are applicable to pickling facilities that are major sources of HAPs or located at major sources of HAPs, unless the source applied for an obtained federally enforceable limits prior to the 40 CFR 63, Subpart CCC compliance date of June 22, 2001 to limit source-wide single HAP and total HAPs to less than 10 and 25 tons per year, respectively. Since this source is a major source for HAPs and never received a permit with federally enforceable limits to make the requirements of 40 CFR 63, Subpart CCC not applicable, it is subject to the requirements of the NESHAP.

The facilities subject to the requirements of 40 CFR 63, Subpart CCC include continuous and batch pickling lines, hydrochloric regeneration plants and hydrochloric acid storage vessels. The facilities at National Processing Company subject to this rule include the following:

- (1) One (1) coil steel pickling line, with a maximum pickling throughput of 250,000 pounds of steel coils per hour, with hydrochloric acid emissions controlled by a wet scrubber, with a maximum flow rate of 7950 actual cubic feet per minute (acfm), exhausting to stack S1, consisting of:
 - (A) one (1) wash tank, with a surface area of 7.5 ft by 8.3 ft
 - (B) three (3) pickling tanks (1-3), each with a corresponding recirculation tank and a surface area of 50 ft by 8.3 ft
 - (C) one (1) four-stage rinse tank system
 - (D) one (1) roll oil coating operation
 - (E) one (1) roll soap coating operation

Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.

- (2) Two (2) storage vessels containing hydrochloric acid with a capacity of 24,100 gallons each. Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.
- (3) Three (3) storage vessels containing spent acid with a total combined capacity of 33,000 gallons. Under 40 CFR 63, Subpart CCC, this is considered an existing affected source.

The entire rule has been included as Attachment B to the permit. The facilities are subject to the following portions of 40 CFR 63, Subpart CCC:

- (1) 40 CFR 63.1155(a)(1), (b), (c);
- (2) 40 CFR 63.1156;
- (3) 40 CFR 63.1157(a);
- (4) 40 CFR 63.1159(b);
- (5) 40 CFR 63.1160(a)(1), (b)(1), (b)(2);
- (6) 40 CFR 63.1161(a), (b), (d);
- (7) 40 CFR 63.1162(a), (c);
- (8) 40 CFR 63.1163;
- (9) 40 CFR 63.1164;
- (10) 40 CFR 63.1165;
- (11) 40 CFR 63.1166; and
- (12) Table 1 of 40 CFR 63, Subpart CCC.

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

- (b) *40 CFR 63, Subpart SSSS: NESHAP for Surface Coating of Metal Coil*
The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil, 40 CFR 63.5080, Subpart SSSS are not included in the permit because the roll oil coating does not meet the definition of coating pursuant to 40 CFR 63.5110 because it consist only of protective oils.
- (c) *40 CFR 63, Subpart DDDDD: NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters*
Any boilers and process heaters, as defined in 40 CFR 63.7575, and not exempt under 40 CFR 63.7491, are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD because they are located at a major source of HAPs. Subpart DDDDD was published in the Federal Register on March 21, 2011. Existing affected sources must comply with Subpart DDDDD no later than March 21, 2014 and must submit an initial notification not later than 120 days after May 20, 2011. The rule is not being incorporated into the permit at this time; however, the Permittee should evaluate which units are subject to the rule as well as the applicable provisions of the rule and submit notification as required in 40 CFR 63.7545.
- (d) *40 CFR 63, Subpart NNNNN: NESHAP for Hydrochloric Acid Production*
The requirements of the National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production, 40 CFR 63.8980, Subpart NNNNN, are not included in the permit because pursuant to 40 CFR 63.8985(b)(2), HCl production facilities that are subject to 40 CFR 63, Subpart CCC are not subject to Subpart NNNNN.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (PSD)

This source was constructed in 1982 and is not one of twenty-eight (28) source categories. The unrestricted potential to emit of PM and PM10 are greater than two hundred-fifty (250) tons per year each. Therefore, in order to be a minor source under 326 IAC 2-2 (PSD), the source shall limit emissions as follows:

- (a) The PM emissions from the Pickling Line Operation shall not exceed 22.6 lb/hr.
- (b) The PM10 emissions from the Pickling Line Operation shall not exceed 22.6 lb/hr.

Compliance with the above limits, combined with the potential to emit PM and PM10 from other units at the source, shall limit the emissions of PM and PM10 from the entire source to less than two hundred-fifty (250) tons per twelve (12) consecutive month period each and render 326 IAC 2-2 (PSD) not applicable.

326 IAC 2-1.1-5 (Nonattainment NSR)

This source is located in Lake County, which is a nonattainment county for PM2.5 as of the issuance of this Part 70 Operating Permit Renewal. The unrestricted potential to emit of PM2.5 is greater than one hundred (100) tons per year. Therefore, in order to be a minor source under 326 IAC 2-1.1-5 (Nonattainment NSR), the source shall limit emissions as follows:

The PM2.5 emissions from the Pickling Line Operation shall not exceed 22.6 lb/hr.

Compliance with the above limit, combined with the potential to emit PM2.5 from other units at the source, shall limit the emissions of PM2.5 from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period each and render 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 every three (3) years. The next submittal deadline is July 1, 2013. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2) since the source is located in the portion of Lake County specified in 326 IAC 5-1-1(c)(4). Except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity from a facility located in Lake County shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period unless otherwise specified in 326 IAC 6-1-10.1.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9* or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

National Processing Company is subject to 326 IAC 6-4 because it is a source of fugitive dust (the generation of particulate matter to the extent that some portion of the material escapes beyond the property line or boundary of the property, right-of-way, or easement on which the source is located).

Pursuant to 326 IAC 6-4-2, a source or sources generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:

- (1) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100 * (R - U)}{U}$$

Where

P = Percentage increase

R = Number of particles of fugitive dust measured at downward receptor site

U = Number of particles of fugitive dust measured at upwind or background site

- (2) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in (1) above shall be modified as follows:

$$P_R = (1.5 \pm N) * P$$

Where

N = Fraction of fugitive dust that is respirable dust

P_R = allowable percentage increase in dust concentration above background

P = no value greater than sixty-seven percent (67%)

- (3) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (4) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section. 326 IAC 6-4-2(4) is not federally enforceable.

State Rule Applicability – Individual Facilities

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

The operation of the pickling line and the hydrochloric acid storage tanks and spent acid storage tanks will emit greater than ten (10) tons per year for a single HAP; however, pursuant to 326 IAC 2-4.1-1(b)(2), because these units are specifically regulated by NESHAP 40 CFR 63, Subpart CCC, which was issued pursuant to Section 112(d) of the CAA, the pickling line, hydrochloric acid storage tanks, and spent acid storage tanks are exempt from the requirements of 326 IAC 2-4.1.

326 IAC 6.8-1-2 (Particulate Emission Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-1(a)(2), this source is subject to 326 IAC 6.8 because the Permittee is not specifically listed but has the potential to emit one hundred (100) tons or more per year particulate matter.

- (a) Pursuant to 326 IAC 6.8-1-2(a), particulate matter emissions from the Steel Pickling Line shall not exceed 0.03 gr/dscf. The Permittee is capable of complying with this emission limitation with the use of the wet scrubber.
- (b) Pursuant to 326 IAC 6.8-1-2(b)(3), particulate matter emissions from the two (2) natural gas-fired boilers, identified as 1 and 2, shall not exceed 0.01 gr/dscf for each unit. Based on the AP-42 emission factor for particulate matter from natural gas combustion, the Permittee should be capable of complying with this emission limit without additional control.

- (c) Pursuant to 326 IAC 6.8-1-2(a), particulate matter emissions from natural gas combustion units that do not meet the definition of a fossil fuel-fired generator shall not exceed 0.03 gr/dscf. This limit applies to the following insignificant activities:
- (1) Two (2) natural gas-fired comfort heating furnaces identified as 3 and 4 with a heat input capacity of 1.925 MMBtu/hr each.
 - (2) One (1) natural gas-fired hot water heater identified as 5 with a heat input capacity of 0.076 MMBtu/hr.
 - (3) One hundred thirty (130) natural gas-fired radiant space heaters identified collectively as 6 with a heat input capacity of 0.1 MMBtu/hr each.
 - (4) Twenty seven (27) natural gas-fired radiant space heaters identified collectively as 7 with a heat input capacity of 0.05 MMBtu/hr each.
 - (5) One (1) natural gas-fired comfort heating furnace identified as 8 with a heat input capacity of 0.1 MMBtu/hr.
 - (6) One (1) natural gas-fired comfort heating furnace identified as 9 with a heat input capacity of 0.12 MMBtu/hr.
 - (7) One (1) natural gas-fired hot water heater identified as 10 with a heat input capacity of 0.04 MMBtu/hr.
 - (8) One (1) natural gas-fired hot water heater identified as 11 with a heat input capacity of 0.034 MMBtu/hr.

Based on the AP-42 emission factor for particulate matter from natural gas combustion, the Permittee should be capable of complying with these emission limits without additional control.

- (d) Pursuant to 326 IAC 6.8-1-2, the particulate matter emissions from the welding facility shall not exceed 0.03 gr/dscf.

326 IAC 6.8-2 (Lake County PM10 Emission Requirements)

National Processing Company is not specifically listed in 326 IAC 6.8-2; therefore the requirements of 326 IAC 6.8-2 are not applicable to the Permittee.

326 IAC 6.8-8 (Continuous Compliance Plan)

The requirements of 326 IAC 6.8-8 are applicable to certain facilities included in 326 IAC 6.8-2. National Processing Company is not specifically listed in 326 IAC 6.8-2; therefore the requirements of 326 IAC 6.8-8 are not applicable to the Permittee.

326 IAC 6.8-10 (Lake County Fugitive Particulate Matter)

The only source of fugitive particulate matter emissions at National Processing Company is from paved roads and the potential to emit from this source is less than five (5) tons per year. Therefore, pursuant to 326 IAC 6.8-10-1(a), the requirements of this rule are not applicable to National Processing Company.

326 IAC 6.8-11 (Lake County Particulate Matter Contingency Measures)

Pursuant to 326 IAC 6.8-11-1(4), National Processing Company is subject to the provisions of 326 IAC 6.8-11 because the source has potential PM10 emissions (uncontrolled) equal to or greater than ten (10) tons per year. The Permittee shall follow the provisions of 326 IAC 6.8-11-4, 326 IAC 6.8-5, and 326 IAC 6.8-6 as required.

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

Pursuant to 326 IAC 6-3-1(c)(3), the provisions of 326 IAC 6-3 shall not apply if a particulate matter emission limitation established in 326 IAC 6.8 is more stringent than an emission limitation established in 326 IAC 6-3.

- (a) The provisions of 326 IAC 6-3 are applicable to manufacturing processes, so the combustion units for comfort heating, hot water, and space heating would not be subject to the provisions of 326 IAC 6-3.
- (b) Pursuant to 326 IAC 6-3-1(b)(1), the provisions of 326 IAC 6-3 are not applicable to combustion for indirect heating, so the boilers would not be subject to the provisions of 326 IAC 6-3.
- (c) Pursuant to 326 IAC 6-3-1(b)(9), the provisions of 326 IAC 6-3 are not applicable to welding, provided that less than 625 pounds of rod or wire is consumed per day, so the welding operation would not be subject to the provisions of 326 IAC 6-3.
- (d) Pursuant to 326 IAC 6-3-2(e), the allowable emissions from the pickling line would be 53.5 lb/hr. This is based on a maximum process weight rate of 250,000 pounds per hour and the following equation:

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

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

Where:

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

The grain loading limit established in 326 IAC 6.8 is equivalent to an allowable emission rate of 2.04 lb/hr, which is more stringent than the 326 IAC 6-3 allowable emission limit. Therefore, the provisions of 326 IAC 6-3 are not applicable to the pickling line.

326 IAC 8-2-4 (Coil Coating Operations)

Pursuant to 326 IAC 8-2-1(a)(3), the roll oil coating operation is subject to the provisions of 326 IAC 8-2-4 (coil coating operations) because a coating is being applied to metal coils from a facility that was existing as of July 1, 1990, the source is located in Lake County, and actual emissions exceed fifteen (15) pounds of VOC per day.

Pursuant to 326 IAC 8-2-4(b), no owner or operator of a coil coating line may allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 0.31 kilograms per liter of coating (2.6 pounds per gallon) excluding water, delivered to the coating applicator.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)

Pursuant to 326 IAC 8-2-9(b)(1), the provisions of 326 IAC 8-2-9 are not applicable to the roll oil coating operation because it is subject to the provisions of 326 IAC 8-2-4.

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

The requirements of 326 IAC 8-1-6 are not applicable to the roll oil coating operation because the potential VOC emissions are less than twenty-five (25) tons per year and the operation is subject to 326 IAC 8-2-4.

Compliance Determination and Monitoring Requirements

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

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

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

Testing Requirements - HCl

In order to comply with 40 CFR 63.1162(a)(1), the Permittee shall conduct performance tests to measure the HCl flows at the scrubber inlet and outlet or the concentration of HCl exiting the scrubber according to the procedures described in 40 CFR 63, Subpart CCC no later than two and a half (2.5) years from the date of the most recent performance test. Performance tests shall be repeated according to an alternative schedule approved by IDEM, OAQ, at least every two and a half (2.5) years from the date of the most recent performance test.

This testing is required pursuant to the provisions of 40 CFR 63, Subpart CCC.

Particulate Control

The wet scrubber for particulate control shall be in operation and control emissions from the pickling line at all times the pickling line is in operation.

The control device must be in operation to control particulate emissions in order to be able to comply with emission limits to render 326 IAC 2-2 (PSD) not applicable for PM and PM10 and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable for PM2.5.

VOC

Compliance with the VOC content and usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

The VOC content of the roll oil coating must be tracked in order to determine compliance with 326 IAC 8-2-4.

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Pickling Line Scrubber	Visible Emissions	Daily	Normal/Abnormal	Response Steps
	Scrubber Pressure Drop	Once per shift	Range established during most recent stack test	Response Steps
	Scrubber Makeup Water Flowrate	Once per shift	Greater than minimum established during most recent stack test	Response Steps
	Scrubber Failure	As observed	Failure/Non-Failure	Feed to the process shut down, emission units shut down no later than completion of the processing of the material in the emission unit, Response Steps

These monitoring conditions are necessary because the scrubber for the pickling line operation must operate properly to ensure compliance with the limits to render 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable. These monitoring conditions shall also satisfy the requirements of 40 CFR 64 (CAM).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on November 16, 2010. Additional information was received on December 7, 2010, December 21, 2010, February 3, 2011, and March 4, 2011.

Conclusion

The operation of this stationary coil steel pickling line and steel cutting operation shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T089-29878-00384.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Laura Spriggs 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) 233-5693 or toll free at 1-800-451-6027 extension 3-5693.
- (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
Summary**

Company Name: National Processing Company
 Location: 4506 W. Cline Ave., East Chicago, IN 46312
 Part 70 Operating Permit Renewal No.: T089-29878-00384
 Reviewer: Laura Spriggs

Uncontrolled Potential to Emit (ton/yr)									
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HCl	Total HAPs
Steel Pickling Line	286.89	286.89	286.89	--	--	20.32	--	286.89	286.89
(2) HCl Storage Vessels	--	--	--	--	--	--	--	0.54	0.54
(3) Spent Acid Storage Vessels	--	--	--	--	--	--	--	0.58	0.58
Insignificant Activities									
Combined Natural Gas Combustion	0.16	0.65	0.65	0.05	8.52	0.47	7.16	--	0.16
Welding Facility	0.10	0.10	0.10	--	--	--	--	--	0.008
(5) Oil Coating Storage Vessels	--	--	--	--	--	0.001	--	--	*
(2) Soap Coating Storage Vessels	--	--	--	--	--	--	--	--	--
(1) Diesel Fuel Storage Vessel	--	--	--	--	--	0.0002	--	--	*
Total	287.15	287.64	287.64	0.05	8.52	20.79	7.16	288.01	288.18

Controlled Potential to Emit (ton/yr)									
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HCl	Total HAPs
Steel Pickling Line	0.86	0.86	0.86	--	--	20.32	--	0.86	0.86
(2) HCl Storage Vessels	--	--	--	--	--	--	--	0.0016	0.0016
(3) Spent Acid Storage Vessels	--	--	--	--	--	--	--	0.0017	0.0017
Insignificant Activities									
Combined Natural Gas Combustion	0.16	0.65	0.65	0.05	8.52	0.47	7.16	--	0.16
Welding Facility	0.10	0.10	0.10	--	--	--	--	--	0.01
(5) Oil Coating Storage Vessels	--	--	--	--	--	0.001	--	--	*
(2) Soap Coating Storage Vessels	--	--	--	--	--	--	--	--	--
(1) Diesel Fuel Storage Vessel	--	--	--	--	--	0.0002	--	--	*
Total	1.12	1.61	1.61	0.05	8.52	20.79	7.16	0.86	1.03

Limited Potential to Emit (ton/yr)									
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HCl	Total HAPs
Steel Pickling Line	99.0	99.0	99.0	--	--	20.32	--	286.89	286.89
(2) HCl Storage Vessels	--	--	--	--	--	--	--	0.54	0.54
(3) Spent Acid Storage Vessels	--	--	--	--	--	--	--	0.58	0.58
Insignificant Activities									
Combined Natural Gas Combustion	0.16	0.65	0.65	0.05	8.52	0.47	7.16	--	0.16
Welding Facility	0.10	0.10	0.10	--	--	--	--	--	0.01
(5) Oil Coating Storage Vessels	--	--	--	--	--	0.001	--	--	*
(2) Soap Coating Storage Vessels	--	--	--	--	--	--	--	--	--
(1) Diesel Fuel Storage Vessel	--	--	--	--	--	0.0002	--	--	*
Total	99.25	99.74	99.74	0.05	8.52	20.79	7.16	288.01	288.18

* Not estimated

Appendix A: Emissions Calculations
Coil Steel Pickling Line

Company Name: National Processing Company
 Location: 4506 W. Cline Ave., East Chicago, IN 46312
 Part 70 Operating Permit Renewal No.: T089-29878-00384
 Reviewer: Laura Spriggs

PTE of HCl and Particulate*

Emission Unit	Maximum Throughput (ton coils/hr)	Uncontrolled HCl EF (lb/ton)	Scrubber Control Efficiency for HCl	Uncontrolled PTE HCl and Particulate* (lb/hr)	Uncontrolled PTE HCl and Particulate* (ton/yr)	Controlled PTE HCl and Particulate* (ton/yr)	Controlled PTE HCl and Particulate* (lb/hr)
Coil Steel Pickling Line	125	0.524	99.7%	65.50	286.89	0.86	0.1965

Methodology

Uncontrolled HCl Emission Factor (EF) and Scrubber Control Efficiency is based on 1/6/2010 testing.
 Uncontrolled PTE HCl (lb/hr) = Maximum Throughput (ton coil/hr) x Uncontrolled HCl EF (lb/ton)
 Uncontrolled PTE HCl (ton/yr) = Uncontrolled PTE HCl (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)
 Controlled PTE HCl (ton/yr) = Uncontrolled PTE HCl (ton/yr) x (1 - Control Efficiency)

As a worst case assumption, particulate emissions are assumed to be

326 IAC 6.8-1-2 Particulate Matter Emission Limitation

Emission Unit	Scrubber Air Flow (acfm)	326 IAC 6.8-1-2 PM Emission Limit (gr/acf)	326 IAC 6.8-1-2 PM Allowable Emissions (lb/hr)	Capable of Complying with Emission Limit?
Coil Steel Pickling Line	7950	0.03	2.04	Yes - with scrubber

Methodology

326 IAC 6.8-1-2 PM Allowable Emissions (lb/hr) = Scrubber Air Flow (acfm) x Outlet Grain Loading (gr/acf) x (60 min/hr) x (1 lb/7000 gr)

VOC Emissions from Roll Oil Coating

Material	Density (lb/gal)	Coating Usage (gal/hr)	Weight % Organic Volatiles	lb VOC/gal Coating (lb VOC/gal)	PTE VOC (ton/yr)	Transfer Efficiency	PTE Particulate (ton/yr)
Roll Oil Coating	7.42	2.50	25.00%	1.86	20.32	100%	0.00

Methodology

lb VOC/gal Coating (lb VOC/gal) = Density (lb/gal) x Weight % Organic Volatiles
 PTE VOC (ton/yr) = Coating Usage (gal/hr) x lb VOC/gal Coating x (8760 hr/yr) x (1 ton/2000 lb)

**Appendix A: Emissions Calculations
Storage Tanks**

Company Name: National Processing Company
 Location: 4506 W. Cline Ave., East Chicago, IN 46312
 Part 70 Operating Permit Renewal No.: T089-29878-00384
 Reviewer: Laura Spriggs

Tank	Capacity Each	Total Capacity	Working Loss (lb/yr)	Breathing Loss (lb/yr)	Total Emissions (lb/yr)	Total Emissions (ton/yr)	Control	Controlled Emissions (ton/yr)
HCl Storage Vessel 1	24100		361.18	179.21	540.39	0.27	99.7%	0.0008
HCl Storage Vessel 2	24100		361.18	179.21	540.39	0.27	99.7%	0.0008
Spent Acid Storage Vessel 1	11000	33000	318.14	70.29	388.43	0.19	99.7%	0.0006
Spent Acid Storage Vessel 2	11000		318.14	70.29	388.43	0.19	99.7%	0.0006
Spent Acid Storage Vessel 3	11000		318.14	70.29	388.43	0.19	99.7%	0.0006
(5) Oil Coating Storage Vessels	500	2500	1.5	0.75	2.25	0.001	0.0%	0.0011
(2) Soap Coating Storage Vessels	2500	5000	0	0	0	0	0.0%	0
(1) Diesel Fuel Storage Vessel	500		0.2	0.2	0.4	0.0002	0.0%	0.0002
Total			1678.48	570.24	2248.72	1.12		0.005

Methodology

Emissions based on TANKS reports provided by the Permittee (see Appendix B to this TSD)

Total Emissions (lb/yr) = Working Loss (lb/yr) + Breathing Loss (lb/yr)

Total Emission (ton/yr) = Total Emissions (lb/yr) x (1 ton/2000 lb)

Control based on scrubber control efficiency for the pickling operation

Controlled Emissions (ton/yr) = Total Emissions x (1 - Control Efficiency)

Appendix A: Emissions Calculations
Natural Gas Combustion Emissions Units (Less than 100 MMBtu/hr)

Company Name: National Processing Company
 Location: 4506 W. Cline Ave., East Chicago, IN 46312
 Part 70 Operating Permit Renewal No.: T089-29878-00384
 Reviewer: Laura Spriggs

Emission Factor in lb/MMCF			Pollutant						
			PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
			1.9	7.6	7.6	0.6	100.0	5.5	84.0
							**see below		
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)						
(1) Natural Gas Fired Boiler (ID 1)	0.64	5.496	0.005	0.021	0.021	0.002	0.275	0.015	0.231
(1) Natural Gas Fired Boiler (ID 2)	0.64	5.496	0.005	0.021	0.021	0.002	0.275	0.015	0.231
(1) Natural Gas Fired Comfort Heating Furnace (ID 3)	1.925	16.532	0.016	0.063	0.063	0.005	0.827	0.045	0.694
(1) Natural Gas Fired Comfort Heating Furnace (ID 4)	1.925	16.532	0.016	0.063	0.063	0.005	0.827	0.045	0.694
(1) Natural Gas Fired Hot Water Heater (ID 5)	0.076	0.653	0.001	0.002	0.002	0.000	0.033	0.002	0.027
(130) Natural Gas Fired Radiant Space Heaters (ID 6) - each 0.1 MMBtu/hr	13	111.647	0.106	0.424	0.424	0.033	5.582	0.307	4.689
(27) Natural Gas Fired Radiant Space Heaters (ID 7) - each 0.05 MMBtu/hr	1.35	11.594	0.011	0.044	0.044	0.003	0.580	0.032	0.487
(1) Natural Gas Fired Comfort Heating Furnace (ID 8)	0.1	0.859	0.001	0.003	0.003	0.0003	0.043	0.002	0.036
(1) Natural Gas Fired Comfort Heating Furnace (ID 9)	0.12	1.031	0.001	0.004	0.004	0.0003	0.052	0.003	0.043
(1) Natural Gas Fired Hot Water Heater (ID 10)	0.04	0.344	0.0003	0.001	0.001	0.0001	0.017	0.001	0.014
(1) Natural Gas Fired Hot Water Heater (ID 11)	0.034	0.292	0.0003	0.001	0.001	0.0001	0.015	0.001	0.012
Total			0.16	0.65	0.65	0.05	8.52	0.47	7.16

*PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable PM combined.

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

Emission Factor in lb/MMCF			HAPs - Organics				
			Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
			2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)				
(1) Natural Gas Fired Boiler (ID 1)	0.64	5.496	5.8E-06	3.3E-06	2.1E-04	4.9E-03	9.3E-06
(1) Natural Gas Fired Boiler (ID 2)	0.64	5.496	5.8E-06	3.3E-06	2.1E-04	4.9E-03	9.3E-06
(1) Natural Gas Fired Comfort Heating Furnace (ID 3)	1.925	16.532	1.7E-05	9.9E-06	6.2E-04	1.5E-02	2.8E-05
(1) Natural Gas Fired Comfort Heating Furnace (ID 4)	1.925	16.532	1.7E-05	9.9E-06	6.2E-04	1.5E-02	2.8E-05
(1) Natural Gas Fired Hot Water Heater (ID 5)	0.076	0.653	6.9E-07	3.9E-07	2.4E-05	5.9E-04	1.1E-06
(130) Natural Gas Fired Radiant Space Heaters (ID 6)	13	111.647	1.2E-04	6.7E-05	4.2E-03	1.0E-01	1.9E-04
(27) Natural Gas Fired Radiant Space Heaters (ID 7) - each 0.05 MMBtu/hr	1.35	11.594	1.2E-05	7.0E-06	4.3E-04	1.0E-02	2.0E-05
(1) Natural Gas Fired Comfort Heating Furnace (ID 8)	0.1	0.859	9.0E-07	5.2E-07	3.2E-05	7.7E-04	1.5E-06
(1) Natural Gas Fired Comfort Heating Furnace (ID 9)	0.12	1.031	1.1E-06	6.2E-07	3.9E-05	9.3E-04	1.8E-06
(1) Natural Gas Fired Hot Water Heater (ID 10)	0.04	0.344	3.6E-07	2.1E-07	1.3E-05	3.1E-04	5.8E-07
(1) Natural Gas Fired Hot Water Heater (ID 11)	0.034	0.292	3.1E-07	1.8E-07	1.1E-05	2.6E-04	5.0E-07
Total			1.8E-04	1.0E-04	6.4E-03	1.5E-01	2.9E-04

Emission Factor in lb/MMCF			HAPs - Metals					Total HAPs (Organics+Metals)
			Lead	Cadmium	Chromium	Manganese	Nickel	
			5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)					
(1) Natural Gas Fired Boiler (ID 1)	0.64	5.496	1.4E-06	3.0E-06	3.8E-06	1.0E-06	5.8E-06	5.2E-03
(1) Natural Gas Fired Boiler (ID 2)	0.64	5.496	1.4E-06	3.0E-06	3.8E-06	1.0E-06	5.8E-06	5.2E-03
(1) Natural Gas Fired Comfort Heating Furnace (ID 3)	1.925	16.532	4.1E-06	9.1E-06	1.2E-05	3.1E-06	1.7E-05	1.6E-02
(1) Natural Gas Fired Comfort Heating Furnace (ID 4)	1.925	16.532	4.1E-06	9.1E-06	1.2E-05	3.1E-06	1.7E-05	1.6E-02
(1) Natural Gas Fired Hot Water Heater (ID 5)	0.076	0.653	1.6E-07	3.6E-07	4.6E-07	1.2E-07	6.9E-07	6.2E-04
(130) Natural Gas Fired Radiant Space Heaters (ID 6) - each 0.1 MMBtu/hr	13	111.647	2.8E-05	6.1E-05	7.8E-05	2.1E-05	1.2E-04	1.1E-01
(27) Natural Gas Fired Radiant Space Heaters (ID 7) - each 0.05 MMBtu/hr	1.35	11.594	2.9E-06	6.4E-06	8.1E-06	2.2E-06	1.2E-05	1.1E-02
(1) Natural Gas Fired Comfort Heating Furnace (ID 8)	0.1	0.859	2.1E-07	4.7E-07	6.0E-07	1.6E-07	9.0E-07	8.1E-04
(1) Natural Gas Fired Comfort Heating Furnace (ID 9)	0.12	1.031	2.6E-07	5.7E-07	7.2E-07	2.0E-07	1.1E-06	9.7E-04
(1) Natural Gas Fired Hot Water Heater (ID 10)	0.04	0.344	8.6E-08	1.9E-07	2.4E-07	6.5E-08	3.6E-07	3.2E-04
(1) Natural Gas Fired Hot Water Heater (ID 11)	0.034	0.292	7.3E-08	1.6E-07	2.0E-07	5.5E-08	3.1E-07	2.8E-04
Total			4.3E-05	9.4E-05	1.2E-04	3.2E-05	1.8E-04	1.6E-01

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Heating Value of Natural Gas is assumed to be 1020 MMBTU/MMCF

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,020 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (Supplement D 3/98)
 Potential Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * (1 ton/2,000 lb)

Appendix A: Emissions Calculations

Welding

Company Name: National Processing Company
 Location: 4506 W. Cline Ave., East Chicago, IN 46312
 Part 70 Operating Permit Renewal No.: T089-29878-00384
 Reviewer: Laura Spriggs

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)		EMISSIONS (lbs/hr)		HAPS (lbs/hr)
			PM/PM10/PM2.5	Mn	PM/PM10/PM2.5	Mn	
WELDING							
Metal Inert Gas (MIG)(carbon steel)	2	0.03	0.0055	0.0005	0.0003	0.00003	0.00003
Stick (E7018 electrode)	6	0.05	0.0211	0.0009	0.006	0.0003	0.0003
Oxyacetylene(carbon steel)	6	0.5	0.0055	0.0005	0.017	0.002	0.002
Total (lb/hr)					0.023	0.002	0.002
Total (ton/yr)					0.10	0.008	0.008

Methodology

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

Welding emissions, lb/hr = (# of stations) x (max. lbs of electrode used/hr/station) x (emission factor, lb. pollutant/lb. of electrode used)

Total Emissions (ton/yr) = Total Emissions (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)

Appendix A: Emissions Calculations
Fugitive Emissions

Company Name: National Processing Company
 Location: 4506 W. Cline Ave., East Chicago, IN 46312
 Part 70 Operating Permit Renewal No.: T089-29878-00384
 Reviewer: Laura Spriggs

Traffic Patterns - All Paved Roads

Twenty 20-ton Semi-Trucks/Day (average load)

Forty 2-ton cars/day (average load)

Average Weight of Vehicle = [(20 x 20 tons) + (40 x 2 tons)]/60 vehicles = 8 tons/vehicle

Daily Travel Length = 0.25 vehicle miles per vehicle

Total Annual Travel Miles = 0.25 miles/vehicle-day x 365 days/yr x 60 vehicles

Paved Roads

The following calculations determine the amount of emissions created by paved roads, based on AP-42, Ch 13.2.1 (1/2011)

Parameter	PM	PM10	PM2.5	Source/Method
Ef = particulate emission factor (lb/VMT)	0.73	0.15	0.04	= $k \cdot (sL^{0.91}) \cdot (W^{1.02})$, Ch. 13.2.1, eqn (1)
k = particle size multiplier (lb/VMT)	0.011	0.0022	0.00054	Table 13.2.1-1
sL = road surface silt loading (g/m ²)	9.7	9.7	9.7	Table 13.2.1-4 (for iron and steel production)
W = average weight of vehicles traveling the road (tons)	8.0	8.0	8.0	Provided by the source
VMT/yr = vehicle miles traveled per year	5475	5475	5475	Provided by the source
PTE = Potential to Emit (ton/yr)	1.99	0.40	0.10	= Ef (lb/VMT) x VMT/yr x (1 ton/2000 lb)

Taking natural mitigation due to precipitation into consideration:

Parameter	PM	PM10	PM2.5	Source/Method
Eext = particulate emission factor extrapolated for natural mitigation (lb/VMT)	0.66	0.13	0.03	= $E_f \cdot [1 - (P/4N)]$, Ch. 13.2.1, eqn (2)
P = number of days in a year with at least 0.01 in of precipitation	125	125	125	Based on Figure 13.2.1-2
N = number of days in a year	365	365	365	
PTE = Potential to Emit (ton/yr)	1.82	0.36	0.09	= Eext (lb/VMT) x VMT/yr x (1 ton/2000 lb)

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

**Appendix B to the Technical Support Document
For Part 70 Operating Permit Renewal No. T089-29878-00384**

TANKS Reports

Source Background and Description

Source Name:	National Processing Company
Source Location:	4506 W. Cline Ave., East Chicago, Indiana 46312
County:	Lake
SIC Code:	3316
Permit Renewal No.:	T089-29878-00384

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Identification and Physical Characteristics

Identification
 User Identification: 1
 City: Chicago
 State: Illinois
 Company: National Processing
 Type of Tank: Horizontal Tank
 Description: HCl 1

Tank Dimensions
 Shell Length (ft): 38.75
 Diameter (ft): 10.50
 Volume (gallons): 24,100.00
 Turnovers: 44.50
 Net Throughput(gal/yr): 1,072,450.00
 Is Tank Heated (y/n): N
 Is Tank Underground (y/n): N

Paint Characteristics
 Shell Color/Shade: White/White
 Shell Condition: Good

Breather Vent Settings
 Vacuum Settings (psig): -0.03
 Pressure Settings (psig): 0.03

Meteorological Data used in Emissions Calculations: Chicago, Illinois (Avg Atmospheric Pressure = 14.38 psia)

TANKS 4.0.9d
Emissions Report - Detail Format
Liquid Contents of Storage Tank

1 - Horizontal Tank
 Chicago, Illinois

Mixture/Component	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
	Month	Avg.	Min.		Max.	Avg.	Min.					
HCl and water	All	50.66	45.76	55.55	49.02	0.4590	0.2200	0.9200	38.8500		21.42	

**TANKS 4.0.9d
Emissions Report - Detail Format
Detail Calculations (AP-42)**

**1 - Horizontal Tank
Chicago, Illinois**

Annual Emission Calculations	
Standing Losses (lb):	179.2098
Vapor Space Volume (cu ft):	2,137.1772
Vapor Density (lb/cu ft):	0.0031
Vapor Space Expansion Factor:	0.0643
Vented Vapor Saturation Factor:	0.8867
Tank Vapor Space Volume:	
Vapor Space Volume (cu ft):	2,137.1772
Tank Diameter (ft):	10.5000
Effective Diameter (ft):	22.7665
Vapor Space Outage (ft):	5.2500
Tank Shell Length (ft):	38.7500
Vapor Density	
Vapor Density (lb/cu ft):	0.0031
Vapor Molecular Weight (lb/lb-mole):	36.6500
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.4590
Daily Avg. Liquid Surface Temp. (deg. R):	510.3272
Daily Average Ambient Temp. (deg. F):	48.0000
Ideal Gas Constant R (psia-cu-ft / (lb-mol-deg R)):	10.731
Liquid Bulk Temperature (deg. R):	508.6500
Tank Paint Solar Absorbance (Shell):	0.1700
Daily Total Solar Insolation Factor (Btu/sect day):	1,225.5876
Vapor Space Expansion Factor	
Vapor Space Expansion Factor:	0.0643
Daily Vapor Temperature Range (deg. R):	19.5658
Daily Vapor Pressure Range (psia):	0.7000
Breather Vent Press. Setting Range (psia):	0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.4590
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	0.2200
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):	0.9200
Daily Avg. Liquid Surface Temp. (deg R):	510.3272
Daily Min. Liquid Surface Temp. (deg R):	505.4307
Daily Max. Liquid Surface Temp. (deg R):	515.2236
Daily Ambient Temp. Range (deg. R):	19.1000
Vented Vapor Saturation Factor	
Vented Vapor Saturation Factor:	0.8867
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.4590
Vapor Space Outage (ft):	5.2500
Working Losses (lb):	
Vapor Molecular Weight (lb/lb-mole):	36.1765
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	36.6500
Annual Net Throughput (gal/yr.):	0.4560
	1,072,450.0000

Annual Turnovers: 44.5000
Turnover Factor: 0.2408
Tank Diameter (ft): 10.5000
Working Loss Product Factor: 1.0000

Total Losses (lb): 5*10.3863

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: Annual

1 - Horizontal Tank
Chicago, Illinois

Components	Losses(lbs)		Total Emissions
	Working Loss	Breathing Loss	
HCl and water	361.18	179.21	540.39

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Identification and Physical Characteristics

Identification
 User Identification: 2
 City: Chicago
 State: Illinois
 Company: National Processing
 Type of Tank: Horizontal Tank
 Description: HCl 2

Tank Dimensions
 Shell Length (ft): 38.75
 Diameter (ft): 10.50
 Volume (gallons): 24,100.00
 Turnovers: 44.50
 Net Throughput(gal/yr): 1,072,450.00
 Is Tank Heated (y/n): N
 Is Tank Underground (y/n): N

Paint Characteristics
 Shell Color/Shade: White/White
 Shell Condition: Good

Breather Vent Settings
 Vacuum Settings (psig): -0.03
 Pressure Settings (psig): 0.03

Meteorological Data used in Emissions Calculations: Chicago, Illinois (Avg Atmospheric Pressure = 14.38 psia)

TANKS 4.0.9d
Emissions Report - Detail Format
Liquid Contents of Storage Tank

2 - Horizontal Tank
 Chicago, Illinois

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
HCl and water	All	50.66	45.75	55.55	49.02	0.4590	0.2200	0.9200	36.6500			21.42	

**TANKS 4.0.9d
Emissions Report - Detail Format
Detail Calculations (AP-42)**

**2 - Horizontal Tank
Chicago, Illinois**

Annual Emission Calculations	
Standing Losses (lb):	179.2098
Vapor Space Volume (cu ft):	2,137.1772
Vapor Density (lb/cu ft):	0.0031
Vapor Space Expansion Factor:	0.0843
Vented Vapor Saturation Factor:	0.8667
Tank Vapor Space Volume:	
Vapor Space Volume (cu ft):	2,137.1772
Tank Diameter (ft):	10.5000
Effective Diameter (ft):	22.7695
Vapor Space Outlets (ft):	5.2500
Tank Shell Length (ft):	38.7500
Vapor Density	
Vapor Density (lb/cu ft):	0.0031
Vapor Molecular Weight (lb/lb-mole):	36.5500
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.4580
Daily Avg. Liquid Surface Temp. (deg. F):	510.3272
Daily Average Ambient Temp. (deg. F):	49.0000
Ideal Gas Constant R (psia-cuft / (lb-mol-deg R)):	10.731
Liquid Bulk Temperature (deg. R):	508.6900
Tank Paint Solar Absorbance (Shell):	0.1700
Daily Total Solar Insolation Factor (Btu/sqft day):	1,225.5876
Vapor Space Expansion Factor	
Vapor Space Expansion Factor:	0.0843
Daily Vapor Temperature Range (deg. R):	19.5858
Daily Vapor Pressure Range (psia):	0.7000
Breather Vent Press. Sealing Range (psia):	0.9600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.4580
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	0.2200
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):	0.9200
Daily Avg. Liquid Surface Temp. (deg. R):	510.3272
Daily Min. Liquid Surface Temp. (deg. R):	505.4307
Daily Max. Liquid Surface Temp. (deg. R):	515.2236
Daily Ambient Temp. Range (deg. R):	19.1000
Vented Vapor Saturation Factor	
Vented Vapor Saturation Factor:	0.8667
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.4580
Vapor Space Outlets (ft):	5.2500
Working Losses (lb):	
Vapor Molecular Weight (lb/lb-mole):	361.1755
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	36.8500
Annual Net Throughput (gal/yr.):	0.4580
	1,072,450.0000

Annual Turnovers: 44.5000
Turnover Factor: 0.8408
Tank Diameter (ft): 10.5000
Working Loss Product Factor: 1.0000

Total Losses (lb): 540.3863

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: Annual

2 - Horizontal Tank
Chicago, Illinois

Components	Losses(lbs)		Total Emissions
	Working Loss	Breathing Loss	
HCl and water	361.18	179.21	540.39

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Identification and Physical Characteristics

Identification
 User Identification: 3
 City: Chicago
 State: Illinois
 Company: National Processing
 Type of Tank: Vertical Fixed Roof Tank
 Description: Spent acid

Tank Dimensions
 Shell Height (ft): 17.00
 Diameter (ft): 12.00
 Liquid Height (ft): 13.00
 Avg. Liquid Height (ft): 10.00
 Volume (gallons): 11,000.00
 Turnovers: 253.25
 Net Throughput(gal/yr): 2,785,764.00
 Is Tank Heated (Y/n): N

Paint Characteristics
 Shell Color/Shade: White/White
 Shell Condition: Good
 Roof Color/Shade: White/White
 Roof Condition: Good

Roof Characteristics
 Type: Dome
 Height (ft): 0.00
 Radius (ft) (Dome Roof): 0.00

Breather Vent Settings
 Vacuum Settings (psig): -0.03
 Pressure Settings (psig): 0.03

Meteorological Data used in Emissions Calculations: Chicago, Illinois (Avg Atmospheric Pressure = 14.38 psia)

TANKS 4.0.9d
Emissions Report - Detail Format
Liquid Contents of Storage Tank

3 - Vertical Fixed Roof Tank
Chicago, Illinois

Mixture/Component	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
	Month	Avg.	Min.		Max.	Avg.	Min.					
Spent HCl and water	All	50.66	45.76	55.55	49.02	0.4590	0.2200	0.9200	35.6500		18.00	

TANKS 4.0.9d
Emissions Report - Detail Format
Detail Calculations (AP-42)

3 - Vertical Fixed Roof Tank
Chicago, Illinois

Annual Emission Calculations	
Standing Losses (lb):	70.2895
Vapor Space Volume (cu ft):	884.7701
Vapor Density (lb/cu ft):	0.0031
Vapor Space Expansion Factor:	0.0843
Vented Vapor Saturation Factor:	0.8401
Tank Vapor Space Volume:	
Vapor Space Volume (cu ft):	884.7701
Tank Diameter (ft):	12.0000
Vapor Space Outage (ft):	7.8231
Tank Shell Height (ft):	17.0000
Average Liquid Height (ft):	10.0000
Roof Outage (ft):	0.8231
Roof Outage (Dome Roof)	
Roof Outage (ft):	0.8231
Dome Radius (ft):	12.0000
Shell Radius (ft):	6.0000
Vapor Density	
Vapor Density (lb/cu ft):	0.0031
Vapor Molecular Weight (lb/lbmole):	36.6500
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.4590
Daily Avg. Liquid Surface Temp. (deg. R):	510.3272
Daily Average Ambient Temp. (deg. F):	49.0000
Ideal Gas Constant R (psia-cuft / (lb-mol-deg R)):	10.731
Liquid Bulk Temperature (deg. R):	508.6900
Tank Paint Solar Absorbance (Shell):	0.1700
Tank Paint Solar Absorbance (Roof):	0.1700
Daily Total Solar Insolation Factor (Btu/sqft day):	1.225.5076
Vapor Space Expansion Factor	
Vapor Space Expansion Factor:	0.0843
Daily Vapor Temperature Range (deg. R):	19.6858
Daily Vapor Pressure Range (psia):	0.7000
Breather Vent Press. Setting Range (psia):	0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.4590
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	0.2200
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):	0.9200
Daily Avg. Liquid Surface Temp. (deg R):	510.3272
Daily Min. Liquid Surface Temp. (deg R):	505.4307
Daily Max. Liquid Surface Temp. (deg R):	515.2236
Daily Ambient Temp. Range (deg. R):	19.1000
Vented Vapor Saturation Factor	
Vented Vapor Saturation Factor:	0.8401
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.4590
Vapor Space Outage (ft):	7.8231

Working Losses (lb):	318.1403
Vapor Molecular Weight (lb/lb-mole):	36.6500
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.4590
Annual Net Throughput (gall/yr):	2,755,764.0000
Annual Turnovers:	253.2513
Turnover Factor:	0.2851
Maximum Liquid Volume (gal):	11,000.0000
Maximum Liquid Height (ft):	13.0019
Tank Diameter (ft):	12.0000
Working Loss Product Factor:	1.0000
Total Losses (lb):	386.4298

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: Annual

3 - Vertical Fixed Roof Tank
Chicago, Illinois

Components	Losses (lbs)		Total Emissions
	Working Loss	Breathing Loss	
Spent HCl and water	318.14	70.29	388.43

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Identification and Physical Characteristics

Identification

User Identification: Diesel Storage Tank
City: Chicago
State: Indiana
Company: National Processing
Type of Tank: Horizontal Tank
Description: 500 gallon diesel storage tank

Tank Dimensions

Shell Length (ft): 5.50
Diameter (ft): 4.00
Volume (gallons): 500.00
Turnovers: 20.00
Net Throughput(gal/yr): 10,000.00
Is Tank Heated (y/n): N
Is Tank Underground (y/n): N

Paint Characteristics

Shell Color/Shade: Red/Primer
Shell Condition: Good

Breather Vent Settings

Vacuum Settings (psig): -0.03
Pressure Settings (psig): 0.03

Meteorological Data used in Emissions Calculations: Chicago, Illinois (Avg Atmospheric Pressure = 14.38 psia)

TANKS 4.0.9d
Emissions Report - Detail Format
Liquid Contents of Storage Tank

Diesel Storage Tank - Horizontal Tank
Chicago, Indiana

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Distillate fuel oil no. 2	All	50.05	48.87	71.12	55.34	0.0055	0.0044	0.0093	130.0000			188.00	Option 1: VP60 = .0065 VP70 = .009

**TANKS 4.0.9d
Emissions Report - Detail Format
Detail Calculations (AP-42)**

**Diesel Storage Tank - Horizontal Tank
Chicago, Indiana**

Annual Emission Calculations	
Standing Losses (lb):	0.1984
Vapor Space Volume (cu ft):	44.0223
Vapor Density (lb/cu ft):	0.0002
Vapor Space Expansion Factor:	0.0814
Vented Vapor Saturation Factor:	0.9993
Tank Vapor Space Volume:	
Vapor Space Volume (cu ft):	44.0223
Tank Diameter (ft):	4.0000
Effective Diameter (ft):	5.2839
Vapor Space Outlets (ft):	2.0000
Tank Shell Length (ft):	5.5000
Vapor Density	
Vapor Density (lb/cu ft):	0.0002
Vapor Molecular Weight (lb/lb-mole):	130.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.0065
Daily Avg. Liquid Surface Temp. (deg. R):	519.7175
Daily Average Ambient Temp. (deg. F):	49.0000
Ideal Gas Constant R (ft-lb/mol-deg R):	10.731
Liquid Bulk Temperature (deg. R):	513.0100
Tank Point Solar Absorptance (Shell):	0.8500
Daily Total Solar Insulation Factor (ft-lb/sq-ft day):	1,225.5676
Vapor Space Expansion Factor	
Vapor Space Expansion Factor:	0.0814
Daily Vapor Temperature Range (deg. R):	44.2938
Daily Vapor Pressure Range (psia):	0.0050
Breather Vent Press. Setting Range (psia):	0.0680
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.0065
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	0.0044
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):	0.0093
Daily Avg. Liquid Surface Temp. (deg. R):	519.7175
Daily Min. Liquid Surface Temp. (deg. R):	508.6441
Daily Max. Liquid Surface Temp. (deg. R):	530.7909
Daily Ambient Temp. Range (deg. R):	19.1000
Vented Vapor Saturation Factor	
Vented Vapor Saturation Factor:	0.9993
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.0065
Vapor Space Outlets (ft):	2.0000
Working Losses (lb):	
Vapor Molecular Weight (lb/lb-mole):	0.2018
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	130.0000
Annual Net Throughput (gal/yr.):	0.0065
	10,000.0000

Annual Turnovers:
Turnover Factor:
Tank Diameter (ft):
Working Loss Product Factor:

20.0000
1.0000
4.0000
1.0000

Total Losses (lb):

0.4000

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: Annual

Diesel Storage Tank - Horizontal Tank
Chicago, Indiana

Components	Losses(lbs)		Total Emissions
	Working Loss	Breathing Loss	
Distillate fuel oil no. 2	0.20	0.20	0.40

TANKS 4.0.9d
Emissions Report - Summary Format
Tank Identification and Physical Characteristics

Identification
 User Identification: Coaling Oil Reservoirs
 City: Chicago
 State: Indiana
 Company: National Processing
 Type of Tank: Horizontal Tank
 Description: 500 coating oil reservoir

Tank Dimensions
 Shell Length (ft): 5.25
 Diameter (ft): 4.00
 Volume (gallons): 500.00
 Turnovers: 32.00
 Net Throughput(gal/yr): 16,000.00
 Is Tank Heated (y/n): N
 Is Tank Underground (y/n): N

Paint Characteristics
 Shell Color/Shade: Gray/Medium
 Shell Condition: Good

Breather Vent Settings
 Vacuum Settings (psig): 0.00
 Pressure Settings (psig): 0.00

Meteorological Data used in Emissions Calculations: Chicago, Illinois (Avg Atmospheric Pressure = 14.38 psia)

TANKS 4.0.9d
Emissions Report - Summary Format
Liquid Contents of Storage Tank

Coating Oil Reservoirs - Horizontal Tank
 Chicago, Indiana

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)		Liquid Bulk Temp (deg F)	Vapor Pressure (psig)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.		Max.	Avg.	Min.					
Distillate fuel oil no. 2	All	57.31	48.04	66.58	52.08	0.0060	0.0042	0.0081	130.0000	188.00	Option 1: VP50 = .0045 VP60 = .0065	

TANKS 4.0.9d
Emissions Report - Summary Format
Individual Tank Emission Totals

Emissions Report for: Annual

Coating Oil Reservoirs - Horizontal Tank
Chicago, Indiana

Components	Losses (lbs)		Total Emissions
	Working Loss	Breathing Loss	
Distillate fuel oil no. 2	0.30	0.15	0.45



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: John DuBrock
National Processing Company
4506 W Cline Avenue
East Chicago, IN 46312

DATE: August 11, 2011

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

SUBJECT: Final Decision
Title V
089-29878-00384

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:
Roseanne Linden, Consultant
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: East Chicago Public Library

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

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

Applicant Name: National Processing Company
Permit Number: 089-29878-00384

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	DPABST 8/11/2011 National Processing Company 089-29878-00384 (Final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		John DuBrock National Processing Company 4506 W Cline Ave East Chicago IN 46312 (Source CAATS) (CONFIRM DELIVERY)										
2		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
3		East Chicago Public Library 1008 W. Chicago Ave. East Chicago IN 46312 (Library)										
4		Caine Steel Company 4500 Euclid Ave East Chicago IN 46312 (Affected Party)										
5		St. Catharine Hospital 4321 Fir St East Chicago IN 46312 (Affected Party)										
6		St. Paul Lutheran Church 2001 E. Franklin East Chicago IN 46312 (Affected Party)										
7		City Express 1600 E. Chicago Ave East Chicago IN 46312 (Affected Party)										
8		Mr. Raymond Dix 2117 Purdue Dr East Chicago IN 46312 (Affected Party)										
9		Mr. Jesus Rodriguez 2207 Purdue Dr East Chicago IN 46312 (Affected Party)										
10		Ms. Barbara Turner 2113 Purdue Dr East Chicago IN 46312 (Affected Party)										
11		Mr. Victor Palomo 4445 Guadalupe Circle East Chicago IN 46312 (Affected Party)										
12		Manuel & Priscilla Garcia 4455 E. Guadalupe Circle East Chicago IN 46312 (Affected Party)										
13		Mr. Roberto Ruiz 4460 W. Guadalupe Circle East Chicago IN 46312 (Affected Party)										
14		Angelo & Clarita Machuca 2805 E. Guadalupe Circle East Chicago IN 46312 (Affected Party)										
15		Mr. Phillip Meyers 2815 Guadalupe Circle East Chicago IN 46312 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	DPABST 8/11/2011 National Processing Company 089-29878-00384 (Final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Gus 2825 Guadalupe Circle East Chicago IN 46312 (Affected Party)										
2		Ms. Anna Avarez 2835 Guadalupe Circle East Chicago IN 46312 (Affected Party)										
3		Mr. Emilio Ruiz 4430 Guadalupe Circle East Chicago IN 46312 (Affected Party)										
4		Robert & Hortensia Gonzalez 4440 E. Guadalupe Circle East Chicago IN 46312 (Affected Party)										
5		Mr. Alfonso Vega 2645 E. Guadalupe Circle East Chicago IN 46312 (Affected Party)										
6		Princella Askew 2705 E. Guadalupe Circle East Chicago IN 46312 (Affected Party)										
7		Ms. Rosa Cuevas 2725 Guadalupe Circle East Chicago IN 46312 (Affected Party)										
8		Ms. Nelda G. Vela 2745 E. Guadalupe Circle East Chicago IN 46312 (Affected Party)										
9		Mr. Don Martin 2715 E. Guadalupe Circle East Chicago IN 46312 (Affected Party)										
10		M. Ruiz 2735 Guadalupe Circle East Chicago IN 46312 (Affected Party)										
11		Ms. Silvia Oppenheim 2755 Guadalupe Circle East Chicago IN 46312 (Affected Party)										
12		Ms. Margaret Ware 2605 Guadalupe Circle East Chicago IN 46312 (Affected Party)										
13		Ms. Earline Goodman 2615 Guadalupe Circle East Chicago IN 46312 (Affected Party)										
14		Mr. Luis Miranda 2635 Guadalupe Circle East Chicago IN 46312 (Affected Party)										
15		Washington Elementary School 1401 144th St East Chicago IN 46312 (Affected Party)										

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Mail Code 61-53

IDEM Staff	DPABST 8/11/2011 National Processing Company 089-29878-00384 (Final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Lameca 4433 Alder St. East Chicago IN 46312 (Affected Party)									
2		Mr. Lonnie Randolph 4437 Alder St East Chicago IN 46312 (Affected Party)									
3		Mr. Tyree Cobb 4434 Arbutus Lane East Chicago IN 46312 (Affected Party)									
4		Mr. Salvador Lopez 4437 Arbutus Lane East Chicago IN 46312 (Affected Party)									
5		Ms. Elizabeth Samaniego 2303 St Joseph Dr East Chicago IN 46312 (Affected Party)									
6		Kenneth & Sharon Beckett 2810 E. Guadalupe Circle East Chicago IN 46312 (Affected Party)									
7		John & Diane Garza 4365 E. Guadalupe Circle East Chicago IN 46312 (Affected Party)									
8		Mr. Cornell Braniting 4420 Lane of the Roses East Chicago IN 46312 (Affected Party)									
9		Ms. Corrine Miranda 2650 E Guadalupe Circle East Chicago IN 46312 (Affected Party)									
10		George & Hilda Pabey 4218 Elm St East Chicago IN 46312 (Affected Party)									
11		Ms. Kathryn Barbar 4101 Magoo Rd East Chicago IN 46312 (Affected Party)									
12		Mr. Samuel Perez 4327 Stewart Ct East Chicago IN 46312 (Affected Party)									
13		Mr. Robert Lindsay 2203 Purdue Dr East Chicago IN 46312 (Affected Party)									
14		Mr. Eugene Williams 2114 Cardinal East Chicago IN 46312 (Affected Party)									
15		Mr. Leon C. Samuel 2730 East Guadalupe Circle East Chicago IN 46312 (Affected Party)									

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1		Carnell 4420 Lane of the Roses East Chicago IN 46312 (Affected Party)										
2		Ms. Nellie Adams 2305 Lituanica East Chicago IN 46312 (Affected Party)										
3		Pedro & Lupe Garza 4375 E. Guadalupe East Chicago IN 46312 (Affected Party)										
4		Socorro & Guadalupe Saldivar 2202 Purdue Drive East Chicago IN 46312 (Affected Party)										
5		Mr. Ignacio Gamez 4435 Guadalupe Circle East Chicago IN 46312 (Affected Party)										
6		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
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. John DuBrock 18544 Dundee Homewood IL 60430 (Affected Party)										
14		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
15		Euclid Machine & Tool 4450 Euclid Ave East Chicago IN 46312 (Affected Party)										

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											Remarks
1		Craig 7901 West Morris Street Indianapolis IN 46231 (Affected Party)									
2		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)									
3		Britt Wenzel Mostradi Platt Environmental (MPE) 1520 Kensington Road, Suite 204 Oak Brook IL 60523-2139 (Affected Party)									
4		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)									
5		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)									
6		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)									
7		Mr. Richard Morrisroe E. Chicago City Planner 4444 Railroad Ave. E. Chicago IN 46312 (Affected Party)									
8		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)									
9		Calumet Township Trustee 31 E 5th Avenue Gary IN 46402 (Affected Party)									
10		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)									
11		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)									
12		Rosanne Linden Mostardi Platt Environmental 1520 Kensington Road Suite 204 Oak Brook IL 60523 (Consultant)									
13		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)									
14		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 (Affected Party)									
15		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 (Local Official)									

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1		Mark 26545 CR 52 Nappanee IN 46550 (Affected Party)										
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												

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