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: March 23, 2012

RE: Magnetics International, Inc / 127-30893-00039

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNTV-PMOD.doc 3/27/08

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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March 23, 2012

Mr. Franz Mullings
Magnetics International Inc.
1111 North State Road 149
Burns Harbor, IN 46304

Re: 127-30893-00039
Significant Permit Modification to
Part 70 Renewal No.: T 127-28796-00039

Dear Mr. Mullings:

Magnetics International Inc. was issued a Part 70 Operating Permit Renewal on January 14, 2011, for a stationary iron oxide and hydrochloric acid production facility. A letter requesting changes to this permit was received on August 19, 2011. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of adding the following units:

(a) One Iron Oxide Packaging Unit, constructed in 1991, identified as P-1, with a maximum capacity of 30,000 tons per year, using baghouse as control, and exhausting to stack S-4.

(b) One Iron Oxide Mill Packaging Unit, constructed in 1996, identified as P-2, with a maximum capacity of 30,000 tons per year, using a baghouse as control, and exhausting to stack S-4.

(c) One Iron Oxide Mill Grinding Unit, constructed in 1996, identified as P-3, with a maximum capacity of 30,000 tons per year, using baghouse as control, and exhausting to stack S-4.

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire Part 70 Operating Permit as modified will be provided at issuance.

This decision is subject to the Indiana Administrative Orders and Procedures Act – IC 4-21.5-3-5. If you have any questions on this matter, please contact Heath Hartley, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Heath Hartley or extension (2-8217), or dial (317) 232-8217.

Sincerely,

Tripurari Sinha

Tripurari P. Sinha, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments:
Updated Permit
Technical Support Document
PTE Calculations

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Magnetics International, Inc
1111 North State Road 149
Burns Harbor, Indiana 46304

(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.: T 127-28796-00039	
Issued by: Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: January 14, 2011 Expiration Date: January 14, 2016

Second Significant Permit Modification No: 127-30893-00039	
Issued by: Tripurari Sinha Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: March 23, 2012 Expiration Date: January 14, 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(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary iron oxide and hydrochloric acid production facility.

Source Address:	1111 North State Road 149, Burns Harbor, Indiana 46304
General Source Phone Number:	219-763-1199
SIC Code:	2819
County Location:	Porter
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(15)]

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

(a) Two (2) Process Lines, installed in 1990 consisting of:

(1) Roaster A-an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-1, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; particulate emissions are controlled by one (1) venturi separator; and HCl emissions are controlled by one (1) absorber and two (2) scrubbers in series. This system exhausts through the stack identified as S-1.

(2) Roaster B- an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-2, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; particulate emissions are controlled by one (1) venturi separator; and HCl emissions are controlled by one (1) absorber and two (2) scrubbers in series. This system exhausts through the stack identified as S-2.

(b) Two (2) iron oxide storage bins, identified as Bin A and Bin B, with a process weight rate of 1.8 tons per hour each, with a storage capacity of 100 tons,each. Each bin is equipped with a baghouse to capture dust and exhaust through stacks 4 and 5 respectively.

(c) One (1) tank farm identified as T-6, consisting of sixteen (16) storage tanks. Tanks No. 1-12 each have a capacity of 30,000 gallons and are used to store either ferrous chloride waste or hydrochloric acid. Tanks No. 13-16 each have a capacity of 33,000 gallons and are used to store either ferrous chloride waste or hydrochloric acid. Each of these tanks are attached to a common vent header and fume scrubber to control vapor loss and exhausts through stack, identified as S-3.

(d) One (1) loading and unloading station with emissions controlled by fume scrubber exhausting through stack, S-3

(e) One (1) Enrichment Facility, consisting of one (1) 4 MMBtu/hr natural gas boiler, constructed in 1994, exhausting through stack EP001 and one (1) processing tank with emissions controlled by an acid fume scrubber and exhausts through stack EP002.

(f) One Iron Oxide Packaging Unit, constructed in 1991, identified as P-1, with a maximum capacity of 30,000 tons per year, using a baghouse as control, and exhausting to stack S-4.

(g) One Iron Oxide Mill Packaging Unit, constructed in 1996, identified as P-2, with a maximum capacity of 30,000 tons per year, using a baghouse as control, and exhausting to stack S-4.

(h) One Iron Oxide Mill Grinding Unit, constructed in 1996, identified as P-3, with a maximum capacity of 30,000 tons per year using a baghouse as control, and exhausting to stack S-4.

A.3 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, T127-28796-00039, 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 or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

(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)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

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

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

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

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a

compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of permits established prior to T127-28796-00039 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, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

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] [40 CFR 72]

(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) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]

(c) 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).

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

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

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

(f) This condition does not apply to emission trades of SO_2 or NO_X under 326 IAC 21 or 326 IAC 10-4.

B.20 Source Modification Requirements [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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

C.2 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

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

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

(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 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

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

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation 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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - 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.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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:

(a) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(b) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for 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.17 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.18 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Two (2) Process Lines, installed in 1990 consisting of:

(1) Roaster A - an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-1, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; particulate emissions are controlled by one (1) venturi separator; and HCl emissions are controlled by one (1) absorber and two (2) scrubbers in series. This system exhausts through the stack identified as S-1.

(2) Roaster B - an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-2, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; particulate emissions are controlled by one (1) venturi separator; and HCl emissions are controlled by one (1) absorber and two (2) scrubbers in series. This system exhausts through the stack identified as S-2.

(b) Two (2) iron oxide storage bins, identified as Bin A and Bin B, with a process weight rate of 1.8 tons per hour each, with a storage capacity of 100 tons,each. Each bin is equipped with a baghouse to capture dust and exhaust through stacks 4 and 5 respectively.

(c) One (1) tank farm identified as T-6, consisting of sixteen (16) storage tanks. Tanks No. 1-12 each have a capacity of 30,000 gallons and are used to store either ferrous chloride waste or hydrochloric acid. Tanks No. 13-16 each have a capacity of 33,000 gallons and are used to store either ferrous chloride waste or hydrochloric acid. Each of these tanks are attached to a common vent header and fume scrubber to control vapor loss and exhausts through stack, identified as S-3.

(d) One (1) loading and unloading station with emissions controlled by fume scrubber exhausting through stack, S-3

(e) One (1) Enrichment Facility, consisting of one (1) 4 MMBtu/hr natural gas boiler, constructed in 1994, exhausting through stack EP001 and one (1) processing tank with emissions controlled by an acid fume scrubber and exhausts through stack EP002.

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

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

D.1.1 Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-2] and Nonattainment NSR [326 IAC 2-1.1-5] [326 IAC 6-3-2]

The permittee shall comply with the following:

(a) The PM emissions from each Roaster exhaust stack shall be less than 8.0 pounds per hour.

(b) The PM_{10} emissions from each Roaster exhaust stack shall be less than 8.0 pounds per hour.

(c) The $PM_{2.5}$ emissions from each Roaster exhaust stack shall be less than 7.25 pounds per hour.

(d) The PM emissions from each iron oxide bin, identified as Bin A and Bin B shall be less than 3.2 pounds per hour.

(e) The PM_{10} emissions from each iron oxide bin, identified as Bin A and Bin B shall be less than 3.2 pounds per hour.

(f) The $PM_{2.5}$ emissions from each iron oxide bin, identified as Bin A and Bin B shall be less than 3.2 pounds per hour.

Compliance with the above limits in combination with the potential PM/PM10 emissions from the other emission units will limit the sourcewide PM/PM10, emissions to less than 250 tons per year and PM2.5 emissions to be less than 100 tons per year, and render requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable to this source.

This will also satisfy the rule 326 IAC 6-3-2.

D.1.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), particulate matter (PM) emissions from the Boiler shall not exceed 0.6 pounds of PM per million British thermal units.

The PM limit was calculated using the equation below:

$$Pt = \frac{1.09}{Q^{0.26}} = 0.76$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and

Q = Total source maximum operating capacity (MMBtu/hr).

Pursuant to 326 IAC 6-2-4(a), the particulate emissions for Q less than 10MM/Btu the Pt shall not exceed 0.6 lbs/MMBtu.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their control equipment. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1)][326 IAC 2-1.1-11]

(a) In order to demonstrate the compliance status with Conditions D.1.1 (a), (b), D.1.2(a) and (b), the Permittee shall perform PM and PM10 testing on the exhaust stacks S-1 and S-2 of the venturi separators controlling Roaster A and B utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

(b) In order to demonstrate the compliance status with Conditions D.1.1(d), (e) and D.1.2(c), the Permittee shall perform PM and PM10 testing on baghouses controlling the iron oxide storage bins utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition

(c) In order to demonstrate the compliance status with Condition D.1.1(c) and (f), the Permittee shall perform PM2.5 testing on Roaster A, and B, Storage Bin A and Bin B silo baghouse within one hundred and eighty (180) days after the issuance of this permit No T127-28796-00039. This testing shall be conducted utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.1.5 Particulate Control [326 IAC 2-7-6(1)]

(a) In order to ensure compliance with Condition D.1.1 and D.1.2, the baghouses, venturi separators and the scrubber shall be in operation and control emissions from the iron oxide and hydrochloric acid regeneration and recovery plant at all times that the equipment are in operation.

(b) The vents from pickle liquor and HCl tanks and vents on tank trucks loaded at the facility shall be directed through a scrubber at all times when the facility is operating.

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

D.1.6 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) For a single compartment cartridge collector or baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment cartridge collector or baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

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

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

D.1.7 Visible Emissions Notations

(a) Visible emission notations of the exhausts from the iron oxide storage bins baghouses (4 and 5) and loading and unloading station shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.8 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) In order to demonstrate the compliance status with Conditions D.1.1, the Permittee shall record the pressure drop across the Baghouses used in conjunction with the iron oxide storage bins, at least once per day when the iron oxide storage bins are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the range of 1.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

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

D.1.9 Record Keeping Requirements

(a) In order to document the compliance status with Condition D.1.7 – Visible Emission Notations, the Permittee shall maintain daily records of visible emission notations of the baghouse stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) In order to document the compliance status with Condition D.1.8 – Baghouse Parametric Monitoring, the Permittee shall maintain the daily records of the pressure drop across baghouses. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).

(c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One Iron Oxide Packaging Unit, constructed in 1991, identified as P-1, with a maximum capacity of 30,000 tons per year, using a baghouse as control, and exhausting to stack S-4.

(b) One Iron Oxide Mill Packaging Unit, constructed in 1996, identified as P-2, with a maximum capacity of 30,000 tons per year, using a baghouse as control, and exhausting to stack S-4.

(c) One Iron Oxide Mill Unit, constructed in 1996, identified as P-3, with a maximum capacity of 30,000 tons per year, using a baghouse as control, and exhausting to stack S-4.

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

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

D.2.1 Nonattainment NSR Minor Limit [326 IAC 2-1.1-5][326 IAC 6-3-2]

The $PM_{2.5}$ emission rate from the three packaging units, P-1, P-2, and P-3 shall not exceed 1.8 pounds per hour.

Compliance with these emission limits together with uncontrolled $PM_{2.5}$ emissions from other emission units will ensure that the total source $PM_{2.5}$ emissions are less than 100 tons per year and therefore will render the requirements of 326 IAC 2-1.1-5 Nonattainment NSR not applicable to the entire source.

This will also satisfy the rule 326 IAC 6-3-2.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their 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

D.2.3 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate the compliance status with Condition D.2.2, within one hundred and eighty (180) days after the issuance of permit 127-30893-00039, the Permittee shall perform $PM_{2.5}$ testing on the baghouse for the bagging operations, identified as P-1 and P-2 and milling operation, P-3 utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.2.4 Particulate Control [326 IAC 2-7-6(1)]

(a) In order to comply with Condition D.2.2, the baghouse shall be in operation and control emissions from P-1, P-2 and P-3 at all times that these units are in operation.

(b) In the event that filtration failure is observed in a multi-compartment unit, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to

normal, and the results of any response actions taken up to the time of notification.

D.2.5 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment cartridge collector or baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

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

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

D.2.6 Visible Emission Notation

(a) Visible emission notations of stack exhaust S-4 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

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

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

D.2.7 Record Keeping Requirement

(a) In order to document the compliance status with Condition D.2.6 - Visible Emission Notation, the Permittee shall maintain daily records of the visible emission notations of the stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).

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

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Two (2) Process Lines, installed in 1990 consisting of:

(1) Roaster A-an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-1, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; particulate emissions are controlled by one (1) venturi separator; and HCl emissions are controlled by one (1) absorber and two (2) scrubbers in series. This system exhausts through the stack identified as S-1.

(2) Roaster B- an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-2, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; particulate emissions are controlled by one (1) venturi separator; and HCl emissions are controlled by one (1) absorber and two (2) scrubbers in series. This system exhausts through the stack identified as S-2.

(b) Two (2) iron oxide storage bins, identified as Bin A and Bin B, with a process weight rate of 1.8 tons per hour each, with a storage capacity of 100 tons,each. Each bin is equipped with a baghouse to capture dust and exhaust through stacks 4 and 5 respectively.

(c) One (1) tank farm identified as T-6, consisting of sixteen (16) storage tanks. Tanks No. 1-12 each have a capacity of 30,000 gallons and are used to store either ferrous chloride waste or hydrochloric acid. Tanks No. 13-16 each have a capacity of 33,000 gallons and are used to store either ferrous chloride waste or hydrochloric acid. Each of these tanks are attached to a common vent header and fume scrubber to control vapor loss and exhausts through stack, identified as S-3.

(d) One (1) loading and unloading station with emissions controlled by fume scrubber exhausting through stack, S-3

(e) One (1) Enrichment Facility, consisting of one (1) 4 MMBtu/hr natural gas boiler, constructed in 1994, exhausting through stack EP001 and one (1) processing tank with emissions controlled by an acid fume scrubber and exhausts through stack EP002.

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

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

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants (NESHAPs) [326 IAC 20-1-1][40 CFR 63, Subpart A]

(a) The Permittee shall comply with the provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the emission units described in this section except when otherwise specified in 40 CFR 63, Subpart CCC.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCI Process Facilities and Hydrochloric Acid Regeneration Plants [40 CFR 63, Subpart CCC][326 IAC 20-29]

Pursuant to 40 CFR 63, Subpart CCC, the Permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCI Process Facilities and Hydrochloric Acid Regeneration Plants the hydrochloric acid regeneration plant which are incorporated by reference as 326 IAC 20-29 for these emission units as specified as follows:

(a) 40 CFR 63.1155
(b) 40 CFR 63.1156
(c) 40 CFR 63.1157
(d) 40 CFR 63.1159
(e) 40 CFR 63.1160
(f) 40 CFR 63.1161
(g) 40 CFR 63.1162
(h) 40 CFR 63.1163
(i) 40 CFR 63.1164
(j) 40 CFR 63.1165
(k) 40 CFR 63.1166
(l) Applicable portions of Tables 1- Subpart 40 CFR 63, Subpart CCC

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

Source Name: Magnetics International, Inc
Source Address: 1111 North State Road 149, Burns Harbor, Indiana 46304
Part 70 Permit No.: T127-28796-00039

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: Magnetics International, Inc
Source Address: 1111 North State Road 149, Burns Harbor, Indiana 46304
Part 70 Permit No.: T127-28796-00039

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: Magnetics International, Inc
Source Address: 1111 North State Road 149, Burns Harbor, Indiana 46304
Part 70 Permit No.: T127-28796-00039

Months: _____ to _ Year: _____

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".	
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	Magnetics International, Inc.
Source Location:	1111 N. State Rd. 149, Burns Harbor, IN 46304
County:	Porter
SIC Code:	2819
Operation Permit No.:	T 127-28796-00039
Operation Permit Issuance Date:	January 14, 2011
Significant Permit Modification No.:	127-30893-00039
Permit Reviewer:	Heath Hartley

Existing Approvals

The source was issued Part 70 Operating Permit No. T 127-28796-00039 on January 14, 2011. The source has since received the following approvals:

(a) Significant Permit Modification No. 127-30573-00039, issued on November 3, 2011.

County Attainment Status

The source is located in Porter County.

Pollutant	Designation
SO_2	Cannot be classified for the area bounded on the north by Lake Michigan; on the west by the Lake County and Porter County line; on the south by I-80 and I-90; and on the east by the LaPorte County and Porter County line. The remainder of Porter County is better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Attainment effective May 11, 2010, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
$PM_{2.5}$	Basic nonattainment designation effective federally April 5, 2005
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 Porter County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3.

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

(b) $PM_{2.5}$
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Porter 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 SO_2 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
Porter County has been classified as attainment or unclassifiable in Indiana for SO_2, CO, PM_{10}, NO_2 and Pb. 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.

Source Status

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

Pollutant	**Emissions** (ton/yr)
PM	98.48
PM_{10}	98.48
$PM_{2.5}$	98.48
SO_2	0.20
VOC	1.50
CO	23.50
NO_X	28.0
HCl	greater than 10
Cl	greater than 10
Total HAPs	greater than 25

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) The existing source is not major for Nonattainment NSR for $PM_{2.5}$ because $PM_{2.5}$ emissions are less than 100 tons per year.

(c) These emissions are based upon Part 70 Permit T127-28796-00039 issued on January 14, 2011.

(d) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Magnetics International, Inc. on August 24, 2011, relating to the inclusion of two processes into the permit; the milling facility and the bagging facility. The following is a list of the modified emission units and pollution control devices:

(a) One Iron Oxide Packaging Unit, constructed in 1991, identified as P-1, with a maximum capacity of 30,000 tons per year, using a baghouse as control, and exhausting to stack S-4.

(b) One Iron Oxide Mill Packaging Unit, constructed in 1996, identified as P-2, with a maximum capacity of 30,000 tons per year, using a baghouse as control, and exhausting to stack S-4.

(c) One Iron Oxide Mill Grinding Unit, constructed in 1996, identified as P-3, with a maximum capacity of 30,000 tons per year, using a baghouse as control, and exhausting to stack S-4.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Increase in PTE Before Controls of the Modification	
Pollutant	**Potential To Emit** (ton/yr)
PM	32.1
PM_{10}	32.1
$PM_{2.5}$	32.1
SO_2	0
VOC	0
CO	0
NO_X	0
Single HAPs	0
Total HAPs	0

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

This source modification is subject to 326 IAC 2-7-10.5(f)(4), because potential PM/PM_{10} emissions are greater than 25 tons/yr. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because there is a case-by-case determination of an emission limit.

Permit Level Determination – PSD and Nonattainment NSR

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

	Potential to Emit (ton/yr)								
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$ ***	**SO_2**	**VOC**	**CO**	**NO_X**	**GHGs**	**HAPs**
P-1	21.4	21.4	7.95	0	0	0	0	0	0
P-2				0	0	0	0	0	0
P-3	10.7	10.7		0	0	0	0	0	0
Total for Modification	32.1	32.1	7.95	0	0	0	0	0	0
Source Total Before Modification**	98.38	98.38	91.81	0.2	1.5	23.5	28	0	> 25
Source Total After Modification	130.5	130.5	99.8	0.2	1.5	23.5	28	0	> 25
PSD Major Source Thresholds	250	250	NA	250	250	250	250	100,000 CO_2e	25
Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	100,000 CO_2e	NA

*$PM_{2.5}$ listed is direct $PM_{2.5}$.
** See calculations for change in Existing Source Total.

(a) This modification to an existing minor stationary source is not major because the source wide emissions are still less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to this modification .

(b) Since the unrestricted potential to emit of this modification would make this source a major source for Nonattainment NSR, this source has elected to limit the potential to emit of $PM_{2.5}$ on existing units Roaster A and Roaster B, along with taking a limit for units in this modification as follows:

(1) The $PM_{2.5}$ emission rate from the three packaging units, P-1, P-2 and P-3, shall not exceed 1.8 pounds per hour.

(2) The $PM_{2.5}$ emission rate from each Roaster shall be less than 7.25 pounds per hour.

Compliance with these emission limits together with uncontrolled PM2.5 emissions from other emission units will ensure that the the total source $PM_{2.5}$ emissions are less than 100 tons per year and therefore will render the requirements of 326 IAC 2-1.1-5, Nonattainment NSR, not applicable to the entire source.

Federal Rule Applicability Determination

NSPS:

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

NESHAP:

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.

(c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 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 new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	**Control Device Used**	**Emission Limitation** (Y/N)	**Uncontrolled PTE** (ton/yr)	**Controlled PTE** (ton/yr)	**Part 70 Major Source Threshold** (ton/yr)	**CAM Applicable** (Y/N)	**Large Unit** (Y/N)
P-1 & P-2: PM_{10}/ $PM_{2.5}$	Baghouse	Y	21.4	0.2	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to P-1 and P-2 and P-3.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-1.1-5 (Nonattainment New Source Review)
Nonattainment New Source Review applicability is discussed under the Permit Level Determination – PSD and Nonattainment NSR section.

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Permit Level Determination – PSD section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the milling and bagging operations, P-1, P-2 and P-3, will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The report is due no later than July 1, every three (3) years. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from P-1 and P-2 and P-3 shall not exceed 9.35 pounds per hour when operating at a process weight rate of 3.42 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The baghouse shall be in operation at all times the P-1, P-2 and P-3 is in operation, in order to comply with this limit.

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 modification are as follows:

Summary of Testing Requirements				
Emission Unit	**Control Device**	**Pollutant**	**Frequency of Testing**	**Limit or Requirement**
P-1 and P-2 and P-3	Baghouse	$PM_{2.5}$	Within 180 days of permit issuance and Every 5 years since last valid compliance demonstration	$PM_{2.5}$: 1.8 lb/hr

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

Control	**Parameter**	**Frequency**	**Range**	**Excursions and Exceedances**
Baghouses for P-1 and P-2 and P-3	Visible Emissions	Daily	Normal-Abnormal	Response Steps

These monitoring conditions are necessary because the baghouses for the P-1 and P-2 must operate properly to ensure compliance with 326 IAC 2-1.1-5 Nonattainment NSR and 326 IAC 6-3 (Process Operations).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T 127-28796-00039. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

D.1.1 Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-2] and Nonattainment NSR [326 IAC 2-1.1-5]

The permittee shall comply with the following:

(a) The PM emissions from each Roaster exhaust stack shall be less than 8.0 pounds per hour.

(b) The PM10 emissions from each Roaster exhaust stack shall be less than 8.0 pounds per hour.

(c) The PM2.5 emissions from each Roaster exhaust stack shall be less than ~~8.0~~**7.25** pounds per hour.

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One Iron Oxide Packaging Unit, constructed in 1991, identified as P-1, with a maximum capacity of 30,000 tons per year, using a baghouse as control, and exhausting to stack S-4.

(b) One Iron Oxide Mill Packaging Unit, constructed in 1996, identified as P-2, with a maximum capacity of 30,000 tons per year, using a baghouse as control, and exhausting to stack S-4.

(c) One Iron Oxide Mill Grinding Unit, constructed in 1996, identified as P-3, with a maximum capacity of 30,000 tons per year using a baghouse as control, and exhausting to stack S-4.

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

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

D.2.1 Nonattainment NSR Minor Limit [326 IAC 2-1.1-5]

The $PM_{2.5}$ emission rate from the three packaging units, P-1, P-2 and P-3 shall not exceed 1.8 pounds per hour.

Compliance with these emission limits together with uncontrolled PM2.5 emissions from other emission units will ensure that the the total source $PM_{2.5}$ emissions are less than 100 tons per year per year and therefore will render the requirements of 326 IAC 2-1.1-5 Nonattainment NSR not applicable to the entire source.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their 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

D.2.3 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate the compliance status with Condition D.2.2, within one hundred and eighty (180) days after the issuance of permit 127-30893-00039, the Permittee shall perform $PM_{2.5}$ testing on the baghouse for the bagging operations, identified as P-1 and P-2 and milling operation, P-3 utilizing methods as approved by the Commissioner at least

once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.2.4 Particulate Control [326 IAC 2-7-6(1)]

(a) In order to comply with Condition D.2.1 and D.2.2, the baghouse shall be in operation and control emissions from P-1, P-2 and P-3 at all times that these units are in operation.

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

D.2.5 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment cartridge collector or baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

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

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

D.2.6 Visible Emission Notation [40 CFR 64]

(a) Visible emission notations of stack exhaust S-4 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

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

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal

visible emissions for that specific process.

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

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

D.2.7 Record Keeping Requirement

(a) In order to document the compliance status with Condition D.2.7 - Visible Emission Notation, the Permittee shall maintain daily records of the visible emission notations of the stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).

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

D.2.8 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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Other Changes

The following changes have been to the permit:

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit~~, is required for these facilities and their control equipment. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1)][326 IAC 2-1.1-11]

(a) In order to ~~determine~~ **demonstrate the** compliance **status** with Conditions D.1.1 (a), (b), D.1.2(a) and (b), the Permittee shall perform PM and PM10 testing on the exhaust stacks S-1 and S-2 of the venturi separators controlling Roaster A and B utilizing methods as approved by the Commissioner~~. This test shall be repeated~~ at least once every five (5) years from the date of the ~~last~~ **most recent** valid compliance demonstration. Testing shall be conducted in accordance with **the provisions of 326 IAC 3-6 (Source Sampling Procedures).** Section C- Performance Testing **contains the Permittee's obligation with regard to the performance testing required by this condition**.

(b) In order to ~~determine~~ **demonstrate the** compliance **status** with Conditions D.1.1(d), (e) and D.1.2(c), the Permittee shall perform PM and PM10 testing on baghouses controlling the iron oxide storage bins utilizing methods as approved by the Commissioner~~. This test shall be repeated~~ at least once every five (5) years from the date of the ~~last~~ **most recent** valid compliance demonstration. Testing shall be conducted in accordance **the**

provisions of 326 IAC 3-6 (Source Sampling Procedures). ~~with~~ Section C- Performance Testing **contains the Permittee's obligation with regard to the performance testing required by this condition**.

(c) In order to ~~determine~~ **demonstrate the** compliance **status** with Condition D.1.1(c) and (f), the Permittee shall perform PM2.5 testing on Roaster A, and B, Storage Bin A and Bin B silo baghouse within one hundred and eighty (180) days after the issuance of this permit No T127-28796-00039. This testing shall be conducted utilizing methods as approved by the Commissioner~~. This test shall be repeated~~ **at least once every five (5) years from the date of the** ~~**last**~~ most recent **valid compliance demonstration. Testing shall be conducted in accordance** the provisions of 326 IAC 3-6 (Source Sampling Procedures). ~~**with**~~ **Section C- Performance Testing** contains the Permittee's obligation with regard to the performance testing required by this condition**.**

D.1.6 Particulate Control [326 IAC 2-7-6(1)]

(a) In order to **ensure compliance** ~~comply~~ with Condition D.1.1 and D.1.2, the baghouses, venturi separators and the scrubber shall be in operation and control emissions from the iron oxide and hydrochloric acid regeneration and recovery plant at all times that the equipments are in operation.

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D.1.7 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) For a single compartment cartridge collector or baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment cartridge collector or baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

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

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D.1.~~8~~**9** Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) In order to demonstrate the compliance status with Conditions D.1.2, D.1.3 and D.1.4, the Permittee shall record the pressure drop across the Baghouses used in conjunction with the iron oxide storage bins, at least once per day when the iron oxide storage bins are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the range of 1.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response**.** ~~steps in accordance with~~ Section C – Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the reasonable response steps required by this condition**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C – Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

(b) The instrument used for determining the pressure shall comply with Section C – 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 Broken or Failed Bag Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~(a) For a single compartment cartridge collector or baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

~~(b) For a single compartment cartridge collector or baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).~~

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

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

D.1.10 Record Keeping Requirements

(a) **In order t**o document **the** compliance **status** with Condition D.1.7 – Visible Emission Notations, the Permittee shall maintain daily records of visible emission notations of the baghouse stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) **In order t**o document **the** compliance **status** with Condition D.1.8 – Baghouse Parametric Monitoring, the Permittee shall maintain the daily records of the pressure drop across baghouses. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 127-30819-00039 and Significant Permit Modification 127-

30893-00039. The staff recommend to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Heath Hartley 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) 232-8217 or toll free at 1-800-451-6027 extension 232-8217.

(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
Bagging and Milling Process

Company Name: Magnetics International, Inc.
Address City IN Zip: 1111 North State Road 149
Permit ID: SPM 127-30893-00039
Reviewer: Heath Hartley
Date: August 19, 2011

New Units

Emission Unit Description	Inlet grain gr/acf	Outlet grain gr/acf	Flow Rate acfm	$PM/PM_{10}/PM_{2.5}$ Uncontrolled Potential Emissions (ton/yr)	$PM_{2.5}$ Limited (ton/yr)	Control Efficiency (%)	$PM/PM_{10}/PM_{2.5}$ Controlled Potential Emissions (ton/yr)
Bagging P-1 or P-2	3.0	0.03	666	21.4	NA	99.0%	0.21
P-3 Milling Unit Loading	3.0	0.03	666	10.7	NA	99.0%	0.11
			Total:	32.1	7.95		0.32

METHODOLOGY

Potential Emissions (tons/yr) = Inlet Gran (gr/acf) * Flow Rate (acfm) * 1 lb/7000 gr* 60 min/hr * 2500 hrs/yr * 1 ton/2000 lbs
The source has a bottleneck of 30,000 tons/yr, each bag fill of 1 ton takes 5 min. Therefore, total operating time is 2500 hrs/yr.
P-3 will run half the time of Bagging Units (1250 hrs).
Limited $PM_{2.5}$ Emissions (ton/yr) = 30,000 tons/yr throughput limit * 0.53 lb/ton limit * 1 ton / 2000 lb

Existing Units

Limits	Existing Permit Limit		New Limits		Source Total Prior to New Units		
	lb/hr	ton/yr	lb/hr	ton/yr	Existing	New	
Roaster A	8.0	35.0	7.25	31.76	NA	NA	
Roaster B	8.0	35.0	7.25	31.76	NA	NA	
Total		70.1		63.51	98.38	91.81	ton/yr
						7.95	ton/yr from new units
					Source Total including New Units:	99.8	ton/yr

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: Franz Mullings
Magnetics International, Inc
1111 N SR 149
Burns Harbor, IN 46304

DATE: March 23, 2012

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

SUBJECT: Final Decision
Significant Permit Modification
127-30893-00039

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:
Michael Sieckmann (Vice President)
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

March 23, 2012

TO: Westchester Public Library

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

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

Applicant Name: Magnetics International, Inc
Permit Number: 127-30893-00039

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	MIDENNEY 3/23/2012 Magnetics International, Incorporated 127-30893-00039 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Franz Mullings Magnetics International, Incorporated 1111 N SR 149 Burns Harbor IN 46304 (Source CAATS) via confirm delivery									
2		Michael Sieckmann VP Magnetics International, Incorporated 661 Andersen Dr, Foster Plz #7 Pittsburgh PA 15220 *(RO CAATS)*									
3		Westchester Public Library 200 W Indiana Ave Chesterton IN 46304-3122 *(Library)*									
4		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 *(Affected Party)*									
5		Porter County Board of Commissioners 155 Indiana Ave, Ste 205 Valparaiso IN 46383 *(Local Official)*									
6		Porter County Health Department 155 Indiana Ave, Suite 104 Valparaiso IN 46383-5502 *(Health Department)*									
7		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 *(Affected Party)*									
8		Mr. Ed Dybel 2440 Schrage Avenue Whiting IN 46394 *(Affected Party)*									
9		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 *(Affected Party)*									
10		Mr. Dee Morse National Park Service 12795 W Alameda Pky, P.O. Box 25287 Denver CO 80225-0287 *(Affected Party)*									
11		Mr. Joseph Virgil 128 Kinsale Avenue Valparaiso IN 46385 *(Affected Party)*									
12		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 *(Affected Party)*									
13		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)									
14		James Grabovac 22 Deer Trail Ogden Dunes IN 46368 *(Affected Party)*									
15		Burns Harbor Town Council 1240 N. Boo Rd Burns Harbor IN 46304 *(Local Official)*									

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1		Eric & Sharon Haussman 57 Shore Drive Ogden Dunes IN 46368 (Affected Party)									
2		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 *(Affected Party)*									
3		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 *(Affected Party)*									
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